



November 5, 2019

**Via USPS and E-Mail**

Dayna Bochco  
Chair, California Coastal Commission  
45 Fremont Street, Suite 2000  
San Francisco, CA 94105

Dear Chair Bochco:

The League of Women Voters of California (LWVC) joins the League of Women Voters of Monterey County (LWVMC) in urging the CA Coastal Commission (CCC) to deny the California American Water application for a Coastal Development Permit for intake slant wells and desalination infrastructure because the Pure Water Monterey Expansion (PWM X) is a vastly superior environmental alternative water supply project.

This opposition to the application of the permit is founded on the LWVC's and LWVMC's positions on natural resources, specifically water. The LWVC's position:

- Provide for assessment of economic, social, and environmental costs and benefits of water projects.
- Encourage a variety of water supply sources with emphasis on nonstructural alternatives.

The League of Women Voters of Monterey County has studied local water issues numerous times over the last few decades. The League completed separate studies and updated its position in 1982, 1995, 2003 and 2007. Among many positions, the League supports maximizing conservation and reclamation for all water uses. When the first desalination plant was being considered in 2009, we led the effort to increase the use of recycled water through the Groundwater Replenishment Program (GWR) and to downsize the desalination plant. Since that time, replenishing the Seaside Aquifer with reclaimed water has been refined and is now a viable alternative to a costly and environmentally damaging desalination plant.

The California Public Utilities Commission (CPUC) approved the CPCN permit (Certificate of Public Conveyance and Necessity) for Cal Am's desalination project in late 2018. Prior to the CPUC making that decision, it approved the basic Pure Water Monterey recycling project for 3500-acre feet of new supply. It also held evidentiary hearings on an expansion of that project to add another 2250-acre feet of new supply. However, before the CPUC finished its review of the expansion, it proceeded to approve the basic desalination project, and asked for follow up reporting on PWM Expansion.

Additional information is now available on PWM X, particularly on cost and environmental impact differences with desalination. Recent electromagnetic imaging data are also available.

By comparison with PWM X, the intake wells and desalination project shows numerous disadvantages related to environmental impacts, environmental justice, cost, and size.

- Desalination has a very large energy need, with corresponding high GHG emissions. PWN X energy need vastly less than the desal energy need.
- Energy supply for desalination is from PGE. PWN X supply is from recovered methane gas from the local landfill.
- Desalination will discharge brine to the Marine Sanctuary. PWN X will divert existing discharge for reclamation, and reduce total discharge into the Sanctuary.
- Coastal dune disturbances are significant with desalination in contrast to PWN X which has none.
- Recent demand numbers and analysis make it clear the desalination is over-sized at 6,252 afy. PWN X is consistent with projected demand needs for 30 – 40 years at 2,250 afy.
- Cost differences are absolutely stunning. Desalination is estimated at \$6000/af, while PWN X is about \$2200/af.
- The desalination project divides the larger community by taking groundwater/brackish water from a lower income community (Marina), offering no compensating benefits to it, and delivering product water to a higher income community (Peninsula).
- The desalination project further divides the Seaside community, since it is served partly by Cal Am, and partly by Marina Coast Water District (the threatened provider to Marina and Seaside).

Slant well technology is new and experimental. It is not in operational use for desalination intakes anywhere in the world. Slant wells are novel and untested and expensive. In theory, it may be ideal. But the reality on the Monterey Peninsula is that the proposed desalination project is excessive and unnecessary.

The League of Women Voters of California supports desalination as a long-range water planning option, but it must be pursued only after all efforts for a low impact project are exhausted.

PWM X is the most environmentally superior project available. And it is by far the most sensible and affordable supply.

The League of Women Voters of California joins the LWVMC in urging the Coastal Commission to deny the Coastal Development Permit for Cal Am's proposed slant wells and desal infrastructure in the coastal zone. We further urge CCC support for Pure Water Monterey Expansion, which is located completely outside the coastal zone.

Respectfully,



Carol Moon Goldberg  
President, League of Women Voters of California

Cc: Executive Director Jack Ainsworth