

Chair and Members, and Staff

CALIFORNIA COASTAL COMMISSION

45 FREMONT, SUITE 2000

SAN FRANCISCO, CA 94105- 2219

RE: Coastal Permit Application - California American Water Coastal Development

October 26, 2022

The League of Women Voters of Monterey County (LWVMC) urges the California Coastal Commission (CCC) to deny the California American Water (Cal Am) application for a Coastal Development Permit for intake slant wells and desalination infrastructure because the Pure Water Monterey Expansion (PWMX) project is a vastly superior alternative in both environmental and economic terms.

Three recent developments should be considered at your November 17 hearing:

1. CPUC action on the Pure Water Monterey Expansion for 2250 acre-feet of additional water is on the verge of approval. The Proposed Decision, announced in late September, recommends approval of the Water Purchase Agreement for Cal Am to place costs into rates. The only objections are from Cal Am, which is arguing for more costs to be approved. No capacity or operational objections have been filed by Cal Am.
2. Cal Am announced new parameters for its MPWSP desal about four weeks ago. It has proposed a capacity reduction from 6.4 mgd to 4.8 mgd, which Cal Am claims will reduce costs to ratepayers. This idea and its implications have not been discussed at Cal Am's recent community meetings.
3. This change in Cal Am's plans raises another fundamental issue: Cal Am has not provided any new information about costs since the last known update in 2017. At minimum, inflation adjustments should have been revealed to the public. Now with Cal Am's revision to a smaller desal that purportedly "will lower costs," Cal Am has still not provided any cost information. As late as its community meeting on October 24, 2022, in Marina, no cost information was provided, despite numerous requests to Cal Am staff for that very information.

LWVMC 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.

As a reminder, LWVMC opposed Cal Am's desal in favor of PWNX in two previous letters to the CCC dated October 16, 2019, and August 26, 2020.

LWVMC supports PWMX as the most environmentally sound project available. It is by far the most sensible and affordable supply. It is located completely outside the coastal zone. And it is on the verge of CPUC approval.

Respectfully,

Marianne Gawain  
President, LWVMC

