



December 16, 2019

Monterey One Water
5 Harris Court, Bldg D
Monterey, CA 93940

Dear Mr. Scuito,

LandWatch opposes the requests for an extension of the public review period for the Pure Water Monterey Expansion draft SEIR. The public review period Nov. 7–Dec. 23, 2019 is ample. This is **subsequent** EIR for a **previously approved** project that has already undergone a full EIR process.

The extension requests are without substantive foundation. The requests appear to be intended only to deny the California Coastal Commission the benefit of the final SEIR for the Pure Water Monterey Expansion because Coastal Commission staff have recommended it as an alternative to Cal-Am's desalination project.

CEQA provides that the public review period for a draft EIR not be longer than 60 days "except under unusual circumstances." (CEQA Guidelines, section 15105(a).) Cal-Am is requesting an extension to January 31, 2020 - 95 days after the November 7, 2019 commencement of the public review period.

None of the requests have identified "unusual circumstances" that would justify ignoring the legitimate interests of the public and of Monterey One Water in moving the expansion forward timely so that it can be considered as an alternative to the desalination project.

Some of the requests mention the "holidays," but holidays are not unusual circumstances. Every month contains holidays.

Other requests mention the "importance" of the project, but its importance was apparent when the public comment period opened on November 7. The Pure Water Monterey Expansion did not become more important just because its opponents now want to deny information to the Coastal Commission.

Your agency should not put itself in the service of Cal Am in an attempt to delay the SEIR and handicap the Coastal Commission. We note your mission and vision focuses on efficient, innovative utilization of wastewater and water recycling:

Monterey One Mission Statement - Monterey One Water is dedicated to meeting the wastewater and water recycling needs of our member agencies while protecting the environment.

Monterey One Vision Statement - Monterey One Water will be a model customer service provider for the efficient, innovative utilization of wastewater.

Efficient means timely. Unnecessary, politically motivated delay isn't efficient. Moreover, last I checked, Cal Am isn't a member agency. Favoring their request for delay is costly and in conflict with the public's interest for expeditious decision-making.

The public and the Coastal Commission are entitled to expeditious review of this important alternative to the desalination project. **The request for an extension should be denied.**

Regards,

A handwritten signature in black ink, appearing to read "Michael D. DeLapa". The signature is stylized and cursive.

Michael D. DeLapa
Executive Director