



**CASTROVILLE
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SERVICES DISTRICT**

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September 29, 2015

Subject: Comment Letter re: In-Basin Return Water

Dear Mr. Lewis:

The Castroville CSD would like to submit comments regarding California American's Desal project (MPWSP). Specifically, Castroville is interested in the fresh water (In-Basin) portion of the saltwater supplying the MPWSP through the slant wells supplying CalAm Desal Project. The California Legislature has determined in Section 8 of the Monterey County Water Resources Agency Act, codified in Section 52-8 of West's Water Code – Appendix, that an object and purpose of the Act is to prohibit groundwater exportation from the Salinas River Groundwater Basin. The portion of the Salinas River Groundwater Basin from which the CalAm slant well would draw water is also over-drafted and has been classified as an area of high priority under the Sustainable Groundwater Management Act of 2014 ("SGMA", Chapters 346, 347 and 348, Statutes of 2014). Export of groundwater from the Basin would be harmful to the Basin and contrary to law.

Castroville presently gets all of its water supply from the 400 foot aquifer through three production wells in the portion of the Salinas River Groundwater Basin designated as high priority under the SGMA. All of these wells are threatened by seawater intrusion. If the fresh part of the source water for MPWSP'S slant wells ("In-Basin water") were to become available to Castroville it would provide multiple benefits.

First, it would provide a new source for the Castroville Community, thus reducing or even eliminating pumping on the over drafted 400 foot aquifer helping to restore it to a balanced condition. Secondly, it would provide a Salinas Valley use for the In-Basin water 365 days a year and 24 hours a day primarily for the highest priority use under section 106 of the Water Code – domestic use.

While the In-Basin water will be a constant source the amount could vary over time. To fully utilize a constant source there needs to be ample storage. One means of storage would be injection into the Salinas Valley basin at a strategic point that would contribute to halting seawater intrusion as part of a comprehensive, conjunctive use plan including plans by the Monterey Regional Water Pollution Control Agency to treat and inject excess agricultural drainage water.

By Castroville accepting the In-Basin supply, it may be possible to reduce pumping on the 400 foot aquifer. This reduced pumping, along with the other water sources being injected into the 400 foot aquifer, would contribute to returning the over drafted Basin to a balanced state that would result in a long term, sustainable, water resource.

Finally, if Castroville were to accept the In-basin component of the MPWSP supply, the In-Basin water use would work to mitigate any effects of the slant well pumping while working towards the reversing seawater intrusion.

If you have any questions please feel free to contact me at eric@castrovillecsd.org or via the phone at 831-633-2560. Thank you for your time and consideration.

Sincerely,



J. Eric Tynan
General Manager