Coalition of Peninsula Businesses

A coalition to resolve the Peninsula water challenge to
comply with the CDO a a reasonable cost

Members Include: Monterey County Hospitality Association, Monterey Commercial Property Owners Association, Monterey Peninsula Chamber of Commerce, Carmel Chamber of Commerce, Pacific Grove Chamber of Commerce, Monterey County Association of Realtors, Community Hospital of the Monterey Peninsula, Associated General Contractors – Monterey District, Pebble Beach Company

September 30, 2015

Mary Jo Borak
California Public Utilities Commission
c/o Environmental Science Associates
550 Kearny Street, Suite 800
San Francisco, California 94108

Submitted by e-mail to: <mpwsp-eir@esassoc.com>

Re: Comments on Monterey Peninsula Water Supply Project draft EIR

Dear Ms Borak:

The Coalition of Peninsula Businesses (CPB) offers the following comments on the Monterey Peninsula Water Supply Project (MPWSP) draft Environmental Impact Report (dEIR).

Generally speaking, the dEIR seems very thorough and well thought out. We do find a few exceptions and these are noted.

Parts of Ch 2 – Water Demand, Supplies, and Water Rights – are troubling.

Operating the desal modules (and the intake wells) at or near maximum capacity every day of the year seems to involve unnecessary risk (see the two bullet points on page 2-19). It should be possible to add desal modules to add needed flexibility to the operation schedule and to add some source water wells to add needed flexibility to the pumping schedule. Since GWR is so far from accomplishing its goals, the GWR product water, if available at a cost comparable to the desal water, could easily be a means to add further flexibility to the desal pumping and operations schedules.

The size of the larger desal plant is still not sufficient to supply foreseeable demand under the ten-year demand scenario required by California Department of Public Health (see second to last paragraph in Section 2.5.1 at page 2-21). Also see last paragraph in Section 2.5 at page 2-20 re the inability of the

larger desal plant to meet demand even under certain conditions using the five-year demand scenario relied on by Cal Am to determine the desal plant size.

We are aware of operational challenges with the Castroville Seawater Intrusion Project (CSIP) – it apparently was not built to design standards and will not be able to handle at all times the freshwater returned to the Salinas Groundwater Basin (SGB) along with other waters produced for use by ag (Salinas Valley Water Project, increased ag water production by MRWPCA). Limiting the project to a larger desal project right now would eliminate sources of conflict for CSIP infrastructure capacity until changes can be made to CSIP infrastructure capacity.

We are also aware of possible problems with the hydrologic and hydrogeologic modeling done in that seawater level increases are not phased in over time but are rather assumed to be average throughout the project's life, this skewing the freshwater content of source water that must be returned to the SGB.

This seems to argue for a larger desal plant capacity than is proposed. We are troubled by the references at sections 2.7.3.1, 2.7.3.2 and 2.7.3.3 that indicate with the smaller project (MPWSP Variant), water production will not be sufficient to return water to the SGB; this seems to argue for either excluding Groundwater Recharge (GWR) from the project at this time or for a larger desal plant than is currently contemplated if GWR is accepted as part of the project. These problems must be dealt with in the final EIR.

A small part of Ch 4, section 4-4 is troubling.

In dealing with Ag Land Trust wells, the conclusions stated (essentially that there exist no operational wells on the property adjacent to the slant well drilling site) are now disputed by Ag Land Trust. In order the make the final EIR as defensible as possible this issue much be more thoroughly studied and resolved – because it is all but certain Ag Land Trust will sue to invalidate the EIR due to inadequacy as it did with the final EIR for the regional desal project several years ago. The effect of desal pumping on groundwater levels of Ag Land Trust's adjacent property (and other nearby properties, in particular to the north and south of the desal pumping) must also be more thoroughly analyzed for similar reasons. The data requested in the Coastal Commission suggestions for its required test well permit amendment are a good example of the additional study that needs to be done.

Ch 6 – MPWSP Variant at section 6.2.2.3 – GWR Source Water – is lacking in salient details.

This section enumerates potential source water options but does not give any details as to volume of source water available, seasonal variations if any in the volume available, or steps necessary to secure rights to the source water.

This section does not offer any analysis of the longer-term viability of possible source water from ag wash operations; this possible source could be compromised by closing and moving of ag was facilities (several closed and moved in the last few years) or by changes in technology in the preparation of produce for delivery to customers.

Also missing from this section is any analysis of reductions in potential source water flows due to technology changes in growing or irrigating crops. It seems likely with ever tightening restrictions on water use that different methods of growing and irrigating crops will be implemented.

Information on the cost or difficulty for bringing some of the source water options up to drinking water standards are missing; we know from a study prepared for the Monterey County Water Resources Agency that the waters in the Blanco Drain and the Reclamation Ditch are among the dirtiest, most polluted waters in the state and will therefor be more expensive to bring up to drinking water standards if it is even possible to eliminate all the pesticides and other poisonous elements in some of the source water options.

Of particular interest is the fact that no end-user costs are even estimated and no reference is made to the "externalities valuation" being studied to determine if GWR is in any sense affordable as part of the project as compared to the end-user cost of desalinated water from a larger desal plant.

One additional factor that needs serious and thorough examination is the long-term effect on the amount water available from the various source water options of increased local water conservation efforts and the new state water saving mandates on the amount of source water.

Intake and brine disposal issues - are to be studied for the Monterey Peninsula Regional Water Authority and commented on by it. We are not expert is these areas and therefore defer to the MPRWA comments and the submission of a report from the MPWRA consultants.

The Coalition offers these comments in order to be helpful and to strengthen the final EIR. We are especially anxious that issues raised by the various agriculture interests be addressed in order to reasonably satisfy those interests and avoid legal challenges that could be fatal to the project.

Sincerely.

John Narigi, Co-chair

Mike Zimmerman, Co-chair