

MONTEREY COUNTY

WATER RESOURCES AGENCY

PO BOX 930
SALINAS, CA 93902
(831)755-4860
FAX (831) 424-7935

DAVID E. CHARDAVOYNE
GENERAL MANAGER



STREET ADDRESS
893 BLANCO CIRCLE
SALINAS, CA 93901-4455

July 1, 2015

Mr. Andrew Barnsdale
California Public Utilities Commission
c/o Environmental Science Associates
550 Kearny St., Ste. 800
San Francisco, CA 94108

**RE: Monterey Peninsula Water Supply Project (MPWSP)
Draft Environmental Impact Report (DEIR) dated April 2015**

Dear Mr. Barnsdale:

Thank you for the opportunity to comment on the DEIR prepared for the Monterey Peninsula Water Supply Project (MPWSP). The Monterey County Water Resources Agency (MCWRA) has reviewed the DEIR, dated April 2015, and has broad project comments, as well as highlights of specific sections of the DEIR which should be considered.

Global comments:

Each slant well is to extend offshore. How is "offshore" defined and how will it be verified post-drilling, that the slant wells do indeed terminate offshore?

Section 2.7.2, Project Water Rights:

Page 2-42 states: "It is also possible that Cal Am could identify a different return mechanism or location than the contemplated injection wells, such as providing desalinated return water directly to a wholesaler in the Basin or an end-user in the basin with certainty that the use of such water would offset ground water pumping from the Basin." However, the concept alternative of "providing desalinated return water directly to . . . an end-user in the Basin" is not carried over into Section 7.10 at page 176. Accordingly, the following alternative should be added to section 7.10: The alternative of providing desalinated return water to the Castroville Community Services District, with any amount above its needs being piped directly to CSIP in the Castroville area, would reduce (or eliminate) groundwater pumping by the Castroville Community Services District and reduce CSIP supplemental well pumping.

Section 4.3.1.2, Salinas Valley Watershed:

Page 4.3-2 states: "Today, the Salinas River drains directly into Monterey Bay approximately 4 miles south of Moss Landing (CCoWS, 2006)." The MCWRA Associate Hydrologist comments are "there is a sand bar in place most of the time that prevents the Salinas River from direct connection with Monterey

Bay. Elevation in the Salinas River Lagoon is maintained via operation of the OSR slide gate, resulting in the Salinas River outflow going through Moss Landing Harbor most of the time”.

Page 4.3-68 states: “. . . one data set was from a Marina Coast Water District well. . . .” The MCWRA Associate Water Resources Hydrologist comments are “please include what aquifer this sample was taken from. I think this well is probably in the Pressure Deep Zone (900-Foot Aquifer)”.

Pages 4.3-74 and 4.3-75 discuss Mitigation Measure 4.3-4, including the temporary storage of brine in a 3 million gallon storage basin. The MCWRA Associate Water Resources Hydrologist comments are “the project expects to generate 13.98 million gallons of brine per day (from page 4.5-2); therefore, a 3 million gallon storage basin seems insufficient”.

Section 4.5.1.4, Existing Marine Environment at the Proposed Intake and Existing Outfall Locations:

Page 4.5-16, “Proposed Subsurface Slant Wells”, states: “The source water would be obtained from subsurface slant wells drilled from shore that terminate under the adjacent coastal dunes, sandy beach, or nearshore surf zone at an estimated depth below msl of 200 to 220 feet.” The MCWRA Associate Water Resources Hydrologist comments are “the text throughout the document is inconsistent; it either says the above, or it says that the wells will terminate offshore. I think the Agency’s view is that these wells must terminate seaward of the mean high tide mark and beneath the seafloor. They cannot terminate in the coastal dunes or sandy beach; this would be within the Salinas Valley Groundwater Basin”.

Section 4.4.3.5, Operations Impacts and Mitigation Measures:

Page 4.4-68, “Test Slant Well”, states: “. . . inland water drawn from the SVGB would not be depleted, but would be returned to the SVGB as in-lieu groundwater recharge to the CSIP pond.” The DEIR should also consider the alternative of returning inland water to the SVGB by providing it to the community of Castroville.

Appendix E2, Monterey Peninsula Water Supply Project Groundwater Modeling and Analysis:

Pages 41 and 49: Feedwater salinity has been estimated. The MCWRA Associate Water Resources Hydrologist comments are “the TDS of the Feedwater and Inland Water should be analyzed in a lab, not estimated or calculated. Laboratory analysis for TDS is very common and inexpensive; there is no need to estimate this value when it can be accurately measured. Then the Ocean Water Percentage should be re-calculated”.

Figures 137-144 and 181-184: Areas under the reverse particle tracking nets will probably see increased chloride concentration in groundwater. This is not discussed in the document.

Thank you for the opportunity to review the DEIR. If you have any questions, please feel free to contact me at (831) 755-4860.

Sincerely,

