



DEPARTMENT OF PARKS AND RECREATION
MONTEREY DISTRICT
2211 GARDEN ROAD
MONTEREY CA 93940

Lisa Ann L. Mangat, Director

June 26, 2015

Andrew Barnsdale
California Public Utilities Commission
c/o Environmental Science Associates
550 Kearny Street, Suite 800
San Francisco, CA 94108

Dear Mr. Barnsdale,

In response to the request for comments on the Draft Environmental Impact Report for the Monterey Peninsula Water Supply Project, California State Parks has prepared the following comments.

PRC 5001.65 states commercial exploitation of resources in units of the state park system is prohibited. Taking of the State Park lands and parking lot for a municipal water system is not appropriate and is not conducive to our mission statement, which is to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

Regarding the construction of Transmission Main Pipeline, it appears that at both the northern and southern boundaries of Fort Ord Dunes State Park, pipeline construction may involve the use of state park lands. This will require approval and close coordination with California State Parks. Impacts to park resources will need to repair and replace in-kind. Regarding construction and placement of Transmission Main Pipeline near First Street in Fort Ord, coordinate work with California State Parks as the utilities for the planned Fort Ord Dunes State Park campground will be installed in this area. The acquisition of utility easements from our office regarding these activities may be required. Please coordinate with us well in advance as the easement process can take up to two years to process. Parking lot maintenance and or road agreements may also need to be negotiated.

The following comments pertain to Options in the EIR that occur on State Park property (Outfall Option 3 – New Outfall at Potrero Road, Outfall Option 5 – New Outfall at Sandholdt Road, Intake Option 3 – Subsurface Slant Wells at Potrero Road, Intake Option 4 – Open-Water Intake at Potrero Road).

If natural resource and recreational public land is to be used for private purposes, easements and fees shall be negotiated with California State Parks for the use of state lands for the installation of permanent desalinization facilities and associated appurtenances located within State Park lands. Operation and maintenance of facilities shall not reduce coastal sand dune habitat, snowy plover habitat or public beach access

Mr. Andrew Barnsdale
June 26, 2015
Page 2

or recreation. Subterranean intake pump vaults and resulting vibrations through the sand column within snowy plover habitat should be further studied to understand what these potential effects are, and may trigger a need for an incidental take permit.

Changes in salinity levels should be further analyzed to show if brine outfall increases salinity levels within the near shore zone and whether shore crustacean species, such as *Emerita analoga*, are impacted. *Emerita analoga* serve as an important source of food for dozens of migratory birds that overwinter at Elkhorn Slough including the endangered Western Snowy plover.

Impacts to Western Snowy Plovers during the construction, operation and maintenance, including impacts from noise and vibration, need to be thoroughly observed and analyzed and the results of any studies made available to State Parks. California State Parks may require compensation for plover monitoring each year during the breeding season for at least 5 years and mitigation of any lost vegetation at a re-vegetation ratio of 3:1. Improvements such as paving and maintenance to the impacted parking lots may also be required by State Parks.

The proposed alternatives will include municipal scale infrastructure improvements which are not specifically identified. Construction of municipal water processing facilities in the proposed State Park land is not compatible with the local coastal plan that protects coastal values or the mission of State Parks. Items such as pumps, electrical service, maintenance facilities, discharge drains for maintenance, equipment housing, vehicle parking, control panels, access manholes, and any above ground features are in conflict with the natural and rural setting in the park. Currently there are no permanent facilities of the type proposed in the park. The parking lot is unpaved and there are no utilities (water, sewer, electrical, or communication) to the site. There are no flush toilets at the site.

Another issue is the use of the parking lot for anything other than coastal access. This site is one of a handful of coastal access points for the public in this segment of the Monterey Coast and State Parks is unlikely to be able to build additional parking due to the sensitive nature of the surrounding lands. Visual impacts are also another great concern, involving the need for security fences and lights around fixtures for water production, noise and vibration impacts, and discharges of any kind.

If you have any questions regarding these comments, please do not hesitate to contact me at (831) 649-2862 or Stephen.bachman@parks.ca.gov.

Sincerely,



Stephen Bachman
Senior Park and Recreation Specialist