

MONTEREY COUNTY

WATER RESOURCES AGENCY

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May 15, 2024

Piret Harmon, General Manager
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924
VIA EMAIL: harmonp@svbgsa.org

Re: Request for Amendment to Subgrant Agreement Between the Salinas Valley Basin Groundwater Sustainability Agency and Monterey County Water Resources Agency, Related to Grant Agreement Number 4600014638

Dear Ms. Harmon:

Monterey County Water Resources Agency (MCWRA) requests an amendment to its Subgrant Agreement with Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) for activities funded by SVBGSA's Department of Water Resources Sustainable Groundwater Management Act (SGMA) Implementation Grant Agreement No. 4600014638.

As has been noted in the quarterly progress reports, the Component 3, Castroville Seawater Intrusion Project (CSIP) Distribution System Upgrades, Category (b) Task 1. Hydraulic Modeling has been delayed. Completion of the model has been delayed since last fall due to the need to conduct additional data verification in support of calibration of the model during the growing season. This work has included the addition of real-time turnout meter installations, SCADA programming adjustments, data analysis related to system flowmeters, and mechanical meter calibrations, to increase model accuracy.

However, these activities to support the model development have not been billed to the grant. MCWRA is requesting consideration of these expenditures to be grant funded. Similarly, Task 2. Development of Water Scheduling System is included in the grant scope, but funding for this work is not currently included in MCWRA's subgrant agreement budget.

Regrettably, the delays in planning tasks for this component have resulted in our determination that it will not be possible to construct and complete the A-1 junction improvement during the grant term. In lieu of implementation of this project, MCWRA is requesting several budget adjustments to redistribute funds in Component 3, Category (c) Task 7. Construction of A-1 Site Piping Upgrades, to cover other costs related to the existing grant work plan. Several work plan modifications are also requested to accompany the budget changes.

The Monterey County Recycled Water Projects, of which CSIP is a key component, provides in lieu water supplies to approximately 12,000 irrigated acres and has delivered an average of 14,000 acre-feet/year of recycled and surface waters, to the seawater intruded area of the 180/400-Foot Aquifer Subbasin, resulting in a decrease of groundwater pumping from historical uses. While this request for a subgrant amendment modifies the CSIP Distribution System Upgrades component in the grant, the changes would continue to support MCWRA in identifying and designing improvements to CSIP to enhance operations of this critical source of in lieu water supplies. This funding from SVBGSA is contributing to the implementation of the CSIP Optimization project identified in the 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan.

Specifically, MCWRA requests the following amendments to its sub-grant agreement:

Component 2: Dry Chlorine Scrubber Upgrade

- Budget Adjustment Request

Increase the grant contribution from \$1,185,000 to \$1,495,000 for Component 2, Category (c), by moving \$310,000 Component 3, Category (c).

- Explanation: The total project cost for the Dry Scrubber Upgrade Project, implemented by Monterey One Water, is \$1,448,470, since the grant term began. Staff time that is estimated to be approximately \$45,000 for design and construction management services. This request would increase the total grant contribution for this project to cover a greater portion of the overall project cost, including engineering services during construction.

Component 3: Castroville Seawater Intrusion Project (CSIP) Distribution System Upgrades

- Exhibit A Work Plan Modifications (see Attachment 1 with tracked changes)

- Modify Task 4. Design Plans, Specifications, Estimations and Bids to complete 60% design plans and remove the following deliverables:
 - 100% design plans and specifications
 - Bid Documents
 - Summary of Bids and Staff Report Requesting approval of contract
- Delete Task 5. Site Permitting and Entitlements, Task 6. Environmental Documentation, and Task 7. Construction of A-1 Site Piping Upgrades
- Add new Task 5. Distribution System Modeling
 - This Task is moved from Component 5 (see below). This task would expand the Distribution System Modeling effort to include utilization of the model to develop several scenarios to upgrade CSIP, including:
 - Improvements to existing distribution system for CSIP optimization
 - Feasibility of Aquifer Storage and Recovery as potential new source of supply for the CSIP system.
 - Feasibility of Seawater Intrusion Extraction Barrier/Regional Water Supply as potential new source of supply for the CSIP system.
- Add new Task 6: Inputs to Recycled Water Master Plan
 - Using Distribution Modeling results, provide input into the development of a Recycled Water Master Plan to outline system upgrades needed for CSIP optimization.
- Modify Task 7. Construction of A-1 Site Piping Upgrades, replacing it with:
 - Task 7. Booster Station Enhancements

There are three booster stations located in the CSIP distribution system that were designed to address low pressure in the system. Groundwater wells can also be used to boost

pressure in the system when the booster stations are not able to fully address the low pressure problems. This new activity includes performance enhancements on the pumps and motors in the three existing CSIP booster stations to increase pressure in system and decrease the need for well use for pressure issues, resulting in a reduction of groundwater pumping.

- **Budget Amendment Request**

- Increase the grant amount in Category (b) from \$520,000 to \$1,387,000.
 - Additional work related to CSIP Distribution System Upgrades and other related optimization improvements, reducing groundwater pumping, are needed to complete the planning and design work to support those improvements. This increase to the planning and design category will cover the cost of the water scheduling, hydraulic model development and design work which can be completed during the grant term. The subgrant agreement currently only covers a portion of the total model development and calibration costs. Model development and calibration has expanded in complexity to include multiple meter calibration and SCADA programming needs. These efforts are anticipated to be completed within the grant term.
- Reduce Component 3 Category (c) by \$1,462,000 and adjust these funds as follows:
 - Component 2 Category (c) – Add \$310,000
 - Component 3 Category (b) – Add \$867,000
 - Return \$285,000 to SVBGSA to cover monitoring well construction costs (Component 7, Category (c))
- Retain \$160,000 in Component 3 Category (c) for revised Task 7. Booster Station Enhancements.

Component 5: Conduct Feasibility Study on Aquifer Storage and Recovery

- Delete Task 4. Distribution System Modeling from Component 5 and move it to Component 3, Task 5, with revisions (see above).

Component 7: Compliance Reporting and Data Expansion.

- Per SVBGSA's request, move \$250,000 from Category (c) to Category (b) to reflect SVBGSA grant amendment, which moved Task 4. Well Registration and Metering to Category (b).
- Delete Task 6 Modeling Updates.

Component 9: Seawater Intrusion Extraction Barrier and Regional Water Supply Feasibility Study

- Return \$56,000 to SVBGSA for unspent funds on water quality sampling. SVBGSA has informed MCWRA that no additional samples need to be taken and therefore requested that this money can be used for other aspects of the feasibility study.

We will gladly work with you to propose these changes to DWR prior to completing these requested subgrant amendments. Please reach out to Shaunna Murray, Deputy General Manager, via email at MurraySL@countyofmonterey.gov with any questions.

Sincerely,

DocuSigned by:

Ara Azhderian

Ara Azhderian

General Manager

cc: Sarah Hardgrave, SVBGSA Deputy General Manager
Shaunna Murray, MCWRA Deputy General Manager

Attachment 1 – Work Plan Modifications

**EXHIBIT A
WORK PLAN**

Project Title: 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan Phase 1 Implementation (2022-2024) (Project)

COMPONENT 2: DRY CHLORINE SCRUBBER UPGRADE AT MONTEREY ONE WATER RECYCLE WATER PLANT

Component 2 involves construction of a dry scrubber system for the Salinas Valley Reclamation Project (SVRP) which is owned and operated by the Monterey One Water (M1W) Recycled Water Plant. This will allow the recycled water system to operate year-round, which will improve both the ability to reliably irrigate agricultural land with recycled water and the sustainability of the Salinas Valley Groundwater Basin and decrease the need to rely on groundwater. Component 2 will enable reduced use of MCWRA's Supplemental Wells during wintertime chlorine system shutdowns by approximately 345 acre-feet per year. This pumping reduction estimate is based on three weeks per year of system shutdown and 115 acre-feet per week of deliveries, the average weekly demand in January between 2012 and 2019. Reducing Supplemental Well use by 345 acre-feet per year will reduce the potential for increased seawater intrusion by improving the overall water balance of the groundwater basin and maintaining the groundwater elevations in the vicinity of these wells, which primarily draw water from the 400-Foot Aquifer of the Subbasin.

Category (c). Implementation/Construction

Task 1. Construction of Scrubber Upgrade

Construct the upgrades to the chlorine building to install the new scrubber system including assessing general conditions, installing new tanks and media, modifying ductwork, upgrading electrical systems and instrumentation, as well as demolition of existing equipment. Construction activities will include minor excavation of pipelines and conduits, pavement demolition and removal, cutting, laying, and welding pipelines and pipe connections; pouring concrete footings for foundations, sluice gate structure, and other support equipment; installing piping, sluice gates and electrical equipment; testing and commissioning facilities; and Supervisory Control and Data Acquisition (SCADA) changes to control new equipment.

Deliverables:

- Photographs of key construction site improvements
- Record drawings/as-built drawings
- Certification of project completion

COMPONENT 3: CSIP DISTRIBUTION SYSTEM UPGRADES

Component 3 enhances water production from recycled sources and conveyance through the CSIP Distribution System via several upgrades that remedy conveyance limitations and distribution reductions by producing a water scheduling system for use by agriculture. The CSIP Distribution System will result in operational efficiencies and new operational conditions and terms including rules, requirements and/or enforcement methods. The water scheduling system will allow for ongoing monitoring to ensure that CSIP irrigators use recycled water as ordered. The system will result in proactive CSIP system management and reduce supplemental well use in the 180/400-Foot Aquifer Subbasin. This Component will upgrade 165 linear feet of critical CSIP pipeline, specifically at the A-1 Monitoring Station (herein referred to as the A-1 Site), to be able to convey higher flows to most of the CSIP system and to optimize pressure. Condition assessments, modeling, identification of system improvements, and design work will support the development of a Recycled Water Master Plan to implement the CSIP Optimization

Projects in the 180/400 foot Aquifer Subbasin GSP, along with Booster Station Enhancements to improve existing operations. This will result in design of a future improvement that reduce in-total pumping reduction from supplemental wells in a range from a low of 248 acre-feet per year (AFY) to a high of 1,625 AFY, with a long-term average of 1,200 to 1,600 AFY.

Category (a): Component Administration

Prepare reports detailing component work completed during reporting period as outlined in Exhibit F, “Report Formats and Requirements” of this Agreement, for inclusion in Component 1 Quarterly Progress Reports. Quarterly Progress Reports will include sufficient information for the DWR Grant Manager to understand and review backup documentation submitted with invoices. Quarterly invoices will accompany the Quarterly Progress Reports. Collect and organize backup documentation by the Component 2 budget category and task and prepare a summary Excel document detailing contents of the backup documentation organized by task.

Prepare the Draft Component Completion Report and submit to the DWR Grant Manager for comment and review 90-days before the end date for the component as outlined in Exhibit C. DWR’s Grant Manager will review the Draft Component Completion Report and provide comments and edits within 30-days of receipt, when possible. Prepare a Final Component Completion Report addressing the DWR Grant Manager’s comments within 30-days before the Component end date outlined in Exhibit C. The report shall be prepared and presented in accordance with the provisions of Exhibit F, “Report Formats and Requirements” and approved by the DWR Grant Manager within 30-days after the end date. All deliverables listed within the Work Plan shall be submitted with the Final Component Completion Report unless a new deliverable due date was approved by the DWR Grant Manager.

Deliverables:

- Component reporting to be included in Quarterly Progress Reports and Invoices
- Draft and Final Component Completion Reports

Category (b): Planning / Design / Environmental

Task 1. Hydraulic Modeling

Prepare and run a dynamic hydraulic model of the regional systems, focusing on the Salinas Valley Reclamation Plant production, system storage, CSIP distribution system conveyance capacity (pressure and flows throughout the system), and current irrigation flow demands to inform the programming and control narrative for safe, efficient operations of the system and appropriate demand limits throughout the system to inform the design process described in Site Upgrade tasks.

Deliverables:

- Information Needs List
- M1W Regional Water Balance Visual Model Output – SVRP Flow Volume Projections
- Final Existing System Deficiencies Technical Memorandum
- Final Modeling Results Technical Memorandum

Task 2. Development of Water Scheduling System

Develop water scheduling protocols that will provide MCWRA and M1W the ability to schedule water orders from CSIP irrigators to use recycled water based on the results of the dynamic hydraulic modeling in Task 1. Conduct ongoing monitoring to ensure that CSIP irrigators use recycled water as ordered and to manage the CSIP system proactively and adaptively to reduce Supplemental Well use in the critically over- drafted basin. Conduct interested party involvement through the Water Quality and Operations Committee, Basin Management Advisory Committee, Board of Directors, and Board of Supervisors.

Deliverables:

- Agricultural Irrigation Water Scheduling Protocols

Task 3. Review Technical Studies/Basis of Design Technical Memorandum

Select a preferred alternative for system improvement designs, based on the Final Modeling Results Technical Memorandum in Task 1. Collect and review relevant project reports, records, data, maps, and other documents relevant to defining the limits and the scope of the project design. Identify the anticipated tests and evaluations that will be needed to complete the design. Verify as-built conditions in the field and make necessary modifications observed during field trip to the existing drawings to assure that proposed modifications are constructible. Conduct a site survey, geotechnical investigations/borings, and property/land surveys, if necessary. Conduct field review site visit with meeting and delivery of a technical summarizing results of the evaluation and supporting information for the selected design. Provide the Draft Memorandum to M1W and MCWRA staff for their comment and discussion.

Deliverables:

- Basis of Design Technical Memorandum
- Geotechnical Investigation Technical Memorandum
- Property Survey

Task 4. Design Plans, Specifications, Estimates, & Bids

Develop the 60% design plans and specifications for the component and submit them to the DWR Grant Manager for review and concurrence prior to completing the final design plans and specifications. ~~After Review of the 60% design plans and specifications by Grantee and concurrence by the DWR Grant Manager, prepare the 100% design plans and specifications in accordance with requirements for public bidding for construction. Submit the 100% design plans and specifications to the DWR Grant Manager for review and concurrence prior to advertising the component for bids. Field checked plans for accuracy and coordination between disciplines, including with M1W operators and maintenance crews. Prepare the Bid Documents that will include the plans, specifications, and an engineer's cost estimate for the component. Advertise bid as required by public contracting requirements and award the contract.~~

Deliverables:

- 60% design plans and specifications
- ~~• 100% design plans and specifications~~
- ~~• Bid documents~~
- ~~• Summary of Bids and Staff Report requesting approval of contract~~

Task 5. Distribution System Modeling

(This Task is moved from Component 5. Distribution System Modeling, Task 4)

~~Task 4: Distribution System Modeling~~

Utilize the Hydraulic Model to develop several scenarios to upgrade CSIP, including the Feasibility of Aquifer Storage and Recovery and the Seawater Intrusion Extraction Barrier/Regional Water Supply as potential new sources of supply for the CSIP system. Model how the injection and extraction wells will work in the existing CSIP system. Identify modifications to the CSIP system needed for efficient operation with the injection/extraction wells. Assess how winter water can be delivered to CSIP users from Monterey One Water while river water is injected into ASR wells. Identify other improvements to existing distribution system for CSIP optimization.

Deliverables:

- Model results memorandum including modifications outcomes and delivery options.

Task 5. Site Permitting and Entitlements

~~Prepare and obtain all necessary permits to construct the component. Obtain access agreements, entitlements, for temporary or permanent access to the properties for construction and long term operations and maintenance of the component. Submit all permits to the DWR Grant Manager for review and concurrence prior to beginning construction activities.~~

Deliverables:

- ~~• Easement agreement(s)~~
- ~~• All required permit(s)~~

Task 6. Environmental Documentation

~~Prepare the appropriate CEQA documentation(s) for the component and file the document(s) with the County Clerk's Office. Submit the CEQA documentation(s) to the DWR Grant Manager for review and concurrence prior to beginning construction activities. Construction may not begin and no costs for Task 5 of this Component may be incurred until the State has reviewed the CEQA document(s), completed its CEQA responsible agency responsibilities and given its environmental clearance in accordance with Paragraphs 5 and D.8 of this Agreement. Any costs incurred for Task 5 of this Component prior to DWR giving its environmental clearance shall not be reimbursed and any such amounts shall be deducted from the total Grant Amount in Paragraph 3.~~

Deliverables:

- CEQA document(s)

Category (c). Implementation / Construction

Task 7. Distribution System Booster Enhancements

There are three booster stations located in the CSIP distribution system that were designed to provide increased pressure during low pressure situations in the system as well as aid in circulating water to the far end lines of the system during high demand usage. Being a gravity fed distribution system, maintaining adequate pressures can be challenging, especially in high demand situations. Groundwater wells often are utilized to boost pressure in the system when the booster stations are not able to fully address the low pressure problems.

Identify a plan and approach for performance enhancements on the Molera, Lapis and Espinosa booster stations' pumps and motors to include necessary overhaul and modifications. The plan will also retrofit and upgrade of the booster station motor controls to a variable frequency drive (VFD) control unit. This will allow more variability and control of the station pressure output and flow, equalizing the pressure need and moving away from groundwater pumping pressure usage. The VFD units also add great efficiency with electrical usage, resulting in a reduction in electrical consumption. Implementation of the performance enhancements will be cycled through each of the booster stations in order to keep each one functional during the peak irrigation season. Ultimately, the booster pump enhancements will provide increased pressure in the system, at critical low pressure areas, which then decreases need for turning on groundwater wells for addressing the low pressure.

Construction of A-1 Site Piping Upgrades

~~Construct the component per the final plans and specifications as outlined in the awarded bid contract. Provide photo documentation of construction activities and include those in the associated quarterly Progress Report(s).~~

~~Perform engineering services during construction and construction management consultant services, which include reviewing project submittals and responding to the Contractor with the Engineer's review comments, attending construction meetings, special as needed field visits, reviewing and responding to requests for information and contract change orders, and redesign as necessary to accommodate unforeseen field conditions.~~

~~Deliverables:~~

- ~~• Photograph documentation and construction progress~~
- ~~• Record drawings/as built drawings~~
- ~~• Certification of project completion~~

~~Task 8. Engineering Design Services During Construction and Construction Management and Support~~

~~Provide engineering services during construction including reviewing project submittals and responding to the Contractor with the Engineer's review comments, attending construction meetings, reviewing and responding to requests for information (RFI) and contract change orders, and redesign as necessary to accommodate unforeseen field conditions. Provide consultant and legal services needed for the implementation of the construction contract, including the following: contractor prevailing wage compliance (if required), legal, asset management, review and integration of operations and maintenance plans into M1W electronic O&M manual system, SCADA programming and integration and associated start-up services by engineers and technical experts.~~

~~Deliverables:~~

- ~~• Copy of issued for construction (IFC) plans and specifications~~
- ~~• Construction progress reports to include in the quarterly Progress Report(s)~~
- ~~• O&M Manuals and Lucity Asset Management Database~~

Category (d): Monitoring / Assessment

Task 9: Monitoring Plan

Monitor operations to track performance and include results in annual reporting. Organize the monitoring results in accordance with the Post-Performance Report requirements listed in Exhibit F.

Deliverables:

- Monitoring plan
- Data organized for future development of the Post-Performance Report

COMPONENT 5: CONDUCT FEASIBILITY STUDY ON AQUIFER STORAGE AND RECOVERY

Component 5 will conduct a feasibility assessment of Salinas River Diversion Facility (SRDF) Winter Flow Injection (Preferred Project 9 in the 180/400-Foot Subbasin GSP) which would divert winter flows from the Salinas River using the existing SRDF facilities and inject the water into the 180/400-Foot Aquifer Subbasin to maintain groundwater elevations, improve water quality, and prevent further seawater intrusion, or alternatively, diverted water could be treated used for beneficial reuse that would reduce groundwater pumping. The feasibility assessment will include technical feasibility as well at determining the operational permitting constraints and alignment with existing water rights and permitting and the future Habitat Conservation Plan for the reservoir operations. The component further utilizes the CSIP Distribution System Model to understand operational constraints.

Category (b): Planning / Design / Environmental

Task 2: Assessment of Project Constraints

Analyze the existing MCWRA permits and policies that will require revisions for implementing the project. Detail the specific permit requirements that may serve as constraints and engage with Monterey County Water Resources Agency to discuss opportunities and constraints with pursuit of identified revisions. Complete project permitting memorandum detailing necessary permitting actions and estimating potential costs and timelines associated with completing revisions of permits which will be used to assess the viability of the project, compare to other projects, and plan next steps.

Deliverables:

- Memorandum describing identified project constraints and feasibility assessment
- Project permitting memorandum

~~Task 4: Distribution System Modeling~~

~~Model how the injection and extraction wells will work in the existing CSIP system. Identify modifications to the CSIP system needed for efficient operation with the injection/extraction wells. Assess how winter water can be delivered to CSIP users from Monterey One Water while river water is injected into ASR wells.~~

~~Deliverables:~~

- ~~• Model results memorandum including modifications outcomes and delivery options.~~

COMPONENT 7: COMPLIANCE REPORTING AND DATA EXPANSION

Component 7 includes the completion of two Annual Reports and filling data gaps. Four Aquifer properties tests will provide characterization data for the aquifer that was identified as a data gap in the 180/400-Foot Aquifer GSP. These data will add to the hydrologic conceptual model for the subbasin. The well registration will establish a relatively accurate count of all active wells in the Subbasin. Through collaboration with other local agencies, well registration will result in a data set of active wells. Well metering will improve estimates of the amount of groundwater extracted from the 180/400-Foot Aquifer Subbasin. Well metering will not include *de minimus* well users. The well registration and well metering work will occur in collaboration with the Monterey County Water Resources Agency (MCWRA) and the existing Groundwater Extraction Management System (GEMS) program.

Category (b): Planning / Design / Environmental ~~(c): Implementation / Construction~~

Task 45: Well Registration and Metering

Commence a process to register all wells in the 180/400-Foot Aquifer. Initiate discussions with Monterey County Environmental Health and Monterey County Water Resources Agency to understand the existing system, conducting interested parties' outreach, identify a software system for registration of all production wells, and initiate well registration effort. Well metering technologies and options will be evaluated, assessed with interested parties, and proposed to improve measuring and reporting of the amount of groundwater extracted from the Aquifer. Address issues identified by DWR in its 180/400-Foot Subbasin GSP approval letter.

Deliverables:

- Well Registration Completion Report

Task 6: Modeling Updates

~~Support model updates under the Salinas Valley Cooperative Model and Decision Tool Development including model version updates, climate data updates, software updates and collaborative Salinas Valley Operational Model evaluation. Complete a publicly published model.~~

Deliverables:

- ~~• Technical Report on Model Updates and publicly published model.~~

COMPONENT 9: SEAWATER INTRUSION FEASIBILITY STUDY

Category (b): Planning / Design / Environmental

Task 1: Feasibility Study - Water quality sampling to provide data to determine location options for extraction wells and brackish water treatment plant.

Attachment 2

Components	MCWRA Subgrant	MCWRA Amendment 2	MCWRA Amended Total
Component 1: Grant Agreement Administration			
Component 2: Dry Chlorine Scrubber Upgrade at Monterey One Water Recycled Water Plant			
Category (c). Implementation/Construction	1,185,000	310,000	1,495,000
Component 3: Castroville Seawater Intrusion Project (CSIP) Distribution System Upgrades			-
Category (a): Component Administration	5,000		5,000
Category (b): Planning / Design / Environmental	520,000	867,000	1,387,000
Category (c). Implementation/Construction	1,622,000	(1,462,000)	160,000
Category (d). Monitoring/Assessment	3,000		3,000
Total			-
Component 4: Interested Parties Outreach and Engagement			-
Category (a): Component Administration			-
Category (e): Engagement/Outreach			-
Total			-
Component 5: Conduct Feasibility Study on Aquifer Storage and Recovery			-
Category (a): Component Administration			-
Category (b): Planning / Design / Environmental	45,000		45,000
Total			-
Component 6: Demand Management Feasibility			-
Category (a): Component Administration			-
Category (b): Planning / Design / Environmental			-
Category (e): Engagement/Outreach			-
Total			-
Component 7: Compliance Reporting and Data Expansion			-
Category (a): Component Administration			-
Category (b): Planning / Design / Environmental		250,000	250,000
Category (c). Implementation/Construction	310,000	(250,000)	60,000
Total			-
Component 8: Implement Deep Aquifer Study Recommendations			-
Category (a): Component Administration			-
Category (b): Planning / Design / Environmental			-
Total			-
Component 9: Seawater Intrusion Feasibility Study			-
Category (a): Component Administration			-
Category (b): Planning / Design / Environmental	131,000	(56,000)	75,000
Total			-
TOTAL	3,821,000	(341,000)	3,480,000