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MONTEREY COUNTY

WATER RESOURCES AGENCY

ATTACHMENT S

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GENERAL MANAGER

July 3, 2019



1441 SCHILLING PLACE, NORTH BUILDING
SALINAS, CA 93901
STREET ADDRESS

Carl Holm, Director
Monterey County Resource Management Agency
1441 Schilling Place, South Second Floor
Salinas, CA 93901

Dear Mr. Holm,

The Monterey County Resource Management Agency (RMA) has requested that the Monterey County Water Resources Agency (Agency) provide comment on certain technical issues addressed by the RMA in its resolution to the Monterey County Board of Supervisors in the matter of California American Water Company Plan Number 150889 (Desalination Component of the Monterey Peninsula Water Supply Project (MPWSP)).

13. FINDING: EIR-CEQA Alternatives to the Proposed Project

EVIDENCE: c) Expanded Pure Water Monterey Project (PWM)

The Agency is in concurrence with RMA, and does not agree with the Appellant's contention that expansion of the PWM Project is a viable long term water supply alternative to the MPWSP as the PWM Project. The PWM Project has not clearly identified a reliable source water to support project expansion.

17. FINDING: Response to Marina Coast Water District Appeal

EVIDENCE: d) Appellant's Contention No. 4

The Agency agrees with RMA in that the MPWSP is a supplemental water supply option to aid in groundwater management and protection against further declines in groundwater levels.

EVIDENCE: e) Appellant's Contention No. 5

The Agency is in concurrence with RMA in its response to Appellant's Contention No. 5. It is the Agency's opinion that there has been no new information presented since the California Public Utilities Commission's (CPUC) certification of the Final Environmental Impact Report (FEIR). Furthermore, the Agency is in strong disagreement with Marina Coast Water District (MCWD) and its consultants regarding the interpretation of Dr. Rosemary Knight's work as identifying a fresh water supply in the coastal dune sands. Also, the Agency believes that the MCWD's opinion is incorrect regarding its assertion that the model assumes a landward groundwater gradient, and that the groundwater gradient seen in the Fall of 2018 is new information. In this regard, the Agency supports comments made by the Hydrologic Working Group Investigation Technical Report (October 2017) as provided in the FEIR; Section 4.4 Groundwater Resources and Responses to comments, Section 8.2-79 to 8.2-98 and Appendices E1-E3.

18. FINDING: Response to Public Water Now (PWN)

EVIDENCE: d) Appellant's Contention No. 3

It is correct that in the "Settlement Agreement and Mutual Release" dated December 4, 2012 the Agency does not support the use of the Pressure 180-Foot Aquifer as a sole source of water for the MPWSP. However, since the agreement date, modeling work performed by the MPWSP Hydrologic Working

The Water Resources Agency manages, protects, stores and conserves water resources in Monterey County for beneficial and environmental use, while minimizing damage from flooding to create a safe and sustainable water supply for present and future generations

Group, along with test slant well data have determined the quantity of feedwater needed for the MPWSP cannot be met by pumping solely from the coastal dune sands, and that the slant wells will extract some water from the Pressure 180-Foot Aquifer. As a result, the Agency is implementing an expanded monitoring program in the coastal area that will focus on identifying any impacts to the Pressure 180-Foot Aquifer from the MPWSP. Additionally, any amount of fresh water calculated to be extracted by the slant wells from the Pressure 180-Foot Aquifer will be returned to the basin.

EVIDENCE: l) Appellant's Contention No. 11

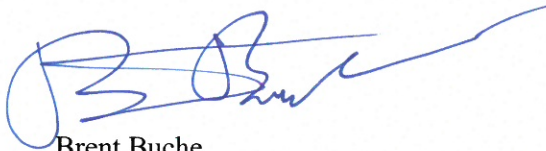
PWN's contention that groundwater quality in the area designated for slant well intake will be impacted by seawater intrusion is incorrect and mischaracterized. Groundwater quality in the area designated for the slant well intake is currently impaired by seawater intrusion, and has been for approximately 45 years. Test slant well pumping began on April 22, 2015 with an ocean water percentage of 73%. The test slant well evaluation was completed on February 28, 2018 and the ocean water percentage was 87%. The percentage of ocean water varies seasonally and climatically depending on rainfall (dry to wet years), among other factors. The highest ocean water concentration reached during the period of test slant well operation was 93% and is associated with the recent drought period. This increase in ocean water percentage is to be expected. Water will flow into the slant wells through the "shortest and least resistant" pathway. Which will primarily occur as ocean water flowing through the sandy seafloor; as opposed to groundwater flowing through less conductive (comparatively tighter packed) aquifer material of the Pressure 180-Foot Aquifer. Also, special conditions imposed by the Coastal Commission sets water quality criteria for both Monitoring Well 4S (Dune Sand Aquifer) and MW-4M (180-Foot Aquifer). This "Special Condition" requires the test slant well to immediately stop pumping if TDS levels in either MW-4S or MW-4M exceed an identified increase in regional Total Dissolved Solids (TDS) trends by two thousand parts per million or more. Test slant well pumping has not been required to stop due to exceedance of this water quality criteria. Water quality monitoring at MW-4S and MW-4M started in April 2015 and has been ongoing since.

EVIDENCE: o) Appellant's Contention No. 15

The Agency is in concurrence with RMA in its response to Appellant's Contention No. 15. The MPWSP will extract mostly seawater and a small amount of seawater-intruded brackish groundwater. Any source water pumped from the slant wells that is not 100% ocean water will be required to be returned to the Salinas Valley Groundwater Basin. The quantity to be returned will be calculated and offered to the Castroville Community Service District (District), which is a severely disadvantaged community (SDAC) and located within the Salinas Valley Groundwater Basin. This will allow the District to reduce pumping in the Basin, in an area that is currently intruded by seawater. Regarding the PWN's contention that treated sewage water discharged to the ocean from the regional water treatment plant is an exportation of water from the basin, it is not the Agency's opinion that this action constitutes water exportation from the basin.

EVIDENCE: r) Appellant's Contention No. 18

The Agency is in concurrence with the RMA in its response to Appellant's Contention No. 18. Agency staff agree with the findings of the CPUC and the FEIR in that the MPWSP is not expected to contribute to seawater intrusion of the Salinas Valley Groundwater Basin.



Brent Buche
General Manager



Howard Franklin, PG
Senior Hydrologist