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**MONTEREY PENINSULA
WATER MANAGEMENT DISTRICT**

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April 21, 2003

Transmitted Via Facsimile

Mr. Bill Fell, Chief of Planning
City of Monterey Community Development Department
City Hall
Monterey, California 93940

**Subject: Forest Pavilion Wing, Community Hospital of the Monterey Peninsula Draft
Environmental Impact Report, State Clearinghouse #2002111038**

Dear Mr. Fell:

The Monterey Peninsula Water Management District (District) has reviewed the Draft Environmental Impact Report for the Forest Pavilion Wing, Community Hospital of the Monterey Peninsula (CHOMP) Draft Environmental Impact and is submitting the following comments:

Special Community Reserve Allocation for CHOMP

In February 1997, the District's Board of Directors adopted Ordinance No. 87, creating a special community reserve water allocation of 18.28 acre-feet of water for the benefit of CHOMP. Water for the special community reserve allocation was created from water conserved under the District's Conservation Plan. The ordinance refers to the Cancer Center and South Pavilion projects as the locations where the community benefit allocation will be used. Water needs of the Forest Pavilion are not mentioned. To support the statement that the Forest Pavilion was not contemplated during the adoption of Ordinance No. 87, District staff cites the following three findings of the ordinance:

Finding No. 1 states: "The CHOMP Master Plan will be implemented in two phases. The first phase involves modernization of the hospital's cancer treatment facilities and the relocation of these facilities into new and remodeled space on the north side of the existing Hospital. This will allow the replacement of existing equipment with state-of-the-art equipment and technology which requires additional space. The second phase involves the upgrading and relocation of the hospital's intensive/coronary care unit, relocation of the inpatient surgery rooms, relocation of the emergency department, and relocation of certain support facilities. The CHOMP Master Plan also includes design features, including improved backup utility systems and relocation of computer systems, which will provide for increased levels of emergency self-sufficiency and support which will enhance the ability of CHOMP to continue providing acute care services during a major disaster."

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The second finding refers to the use of the Community Benefit Allocation that was contemplated by the ordinance: "Implementation of the CHOMP Master Plan will result in an increase in water use of approximately 3.41 acre feet ("AF") for phase one and approximately 14.87 AF for phase two, for a combined total of approximately 18.28 AF. CHOMP and the City of Monterey have requested that the District create a special community reserve water allocation from the District for the implementation of the CHOMP Master Plan." Table 14 in the DEIR indicates the total water needs of the Cancer Center and the South Pavilion are 18.28 acre-feet.

Finding No. 18 states "The CHOMP Master Plan will result in modernization, improvement, relocation, replacement and reconstruction of existing CHOMP facilities and services in new and existing structures on the CHOMP site and will result in facilities and structures with substantially the same purposes as existing CHOMP facilities. The replacement facilities will continue to provide the same health care services currently being provided by CHOMP, including cancer, heart, stroke, and emergency patient care, as well as support operations. However, the new facilities will be upgraded over existing facilities to meet the spatial demands of current health care technology and equipment and to meet current hospital construction codes and standards (including current seismic standards). The new facilities will also include improved backup utility systems which will enhance the ability of CHOMP to be self sufficient and to continue operation in a major emergency affecting public utilities. In addition, the existing hospital departments, facilities and services will be relocated and reconfigured to improve and enhance the efficiency of hospital operations and the delivery of the patient care. The cancer treatment facilities will be relocated to new and remodeled structures on the CHOMP site currently occupied by other hospital functions, including the Cardiopulmonary-Wellness Program, Payroll and Employee Health. The intensive care/coronary care unit, inpatient surgical suite and emergency department will be relocated from their current locations to the replacement structure (South Pavilion) to be built during implementation of phase two of the CHOMP Master Plan. Diagnostic Radiology services will be consolidated from three separate locations to a single location in the space to be vacated by inpatient surgery, emergency and the intensive/coronary care unit. Existing parking spaces lost due to construction of the South Pavilion will be replaced by new parking capacity in the South Pavilion. Existing hospital functions will continue under the implemented CHOMP Master Plan without significantly increasing the number of patients to be served."

In conclusion, Ordinance No. 87 apparently did not provide water for the Forest Pavilion Project.

Water Credit from the Former CDF Fire Station

The District has documented a formal Water Use Credit in the amount of 1.258 acre-feet for the former California Department of Forestry fire station site. This credit has been extended once and will finally expire in April 2005 if it is not applied to a water permit. The fire station occupied the property off Holman Highway where the entrance to the new parking structure is located. As there appears to be continuing water use on the meter serving the site of the former CDF facility, the

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District is in the process of reviewing the water uses served by that meter to confirm that savings from the CDF site remain valid.

Other Documented Water Use Credits

As part of its voluntary water conservation program, CHOMP has implemented, or is studying the feasibility of implementing, measures to lower water use at CHOMP. These measures include an upgrade of the pumping and filtration system on the hospital's Koi pond, an upgrade in the hospital's walk-in cooler refrigeration system, a possible cooling tower retrofit, and new water-saving sterilizers.

To date, the District has agreed that Water Use Credits will be issued for the Koi Pond retrofit, and the actual water savings are being reviewed to establish the amount of that credit. The walk-in cooler project is also being reviewed, and the District is in the process of verifying water savings associated with the new sterilizers that were installed recently. No water savings have yet been confirmed or quantified for these voluntary projects.

It should be noted that District Ordinance No. 87, Section 3, Conservation Requirements states: "The creation of this special community reserve allocation for the benefit of CHOMP shall not be deemed to relieve CHOMP of any obligation to implement water conservation measures which it may have under any requirement of law. In addition, CHOMP shall take all reasonable steps necessary to investigate the feasibility and cost effectiveness of its planned walk-in refrigeration unit and cooling tower retrofit programs, and, if feasible and cost effective, to implement these measures to further reduce water use at CHOMP."

Finding No. 12 of Ordinance No. 87 states:

"12. As part of its voluntary water conservation program, CHOMP has implemented or is considering implementation of measures to lower water use at CHOMP. CHOMP is seeking water credits from the District for these past and future retrofit and water conservation measures. These measures include an upgrade of the pumping and filtration system on the hospital's Koi pond, an upgrade in the hospital's walk-in cooler refrigeration system, and a cooling tower retrofit. These projects are expected to result in significant water savings. These measures may enable CHOMP to offset much of the water allocated to CHOMP by this special community reserve, but the achievement of these near-term conservation savings at the hospital is not certain or guaranteed." (Emphasis added).

Mandated Conservation Measures

As required by the District as a condition of Water Permit #14483, CHOMP was required to retrofit its restroom and bathroom fixtures, including toilets, showerheads, and faucets. As of December 1999, the District had verified installation of ultra-low flush toilets, but had not verified the

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installation of faucet aerators. CHOMP is not eligible to receive water credits for the water conserved by this required fixture retrofit program.

Finding No. 13 of Ordinance No. 87:

"13. CHOMP is also implementing a program to retrofit all bathroom and rest room fixtures, including toilets, showerheads and faucets, which will result in significant water savings. CHOMP will not be eligible for water credits for this program under current District regulations. This program is anticipated to be completed in 1998. While the amount of water to be saved is not subject to precise calculation at this time, water consumption of the new fixtures will be substantially less than that of existing fixtures. For example, toilets installed under this program will use approximately 54 percent less per flush than existing toilets. Under this program, there will be further substantial reductions in water use compared to existing water use at CHOMP, which will contribute to augmenting the conservation savings."

Future Water Demand

The District has used the Group II Commercial Water Use factor of 0.0002 acre-foot/square-foot to calculate water demand for the last two CHOMP expansions that it has permitted (the MARIE Project--MPWMD Permit #14483 and the Cancer Center--MPWMD Permit #16235). However, in reviewing the information related to current CHOMP water use, it is apparent that the District should revisit its use of the Commercial Water Use Factor.

CHOMP has proposed an alternative approach to the calculation of water demand for this project. Rather than using the District's Group II Commercial Water Use Factor for medical uses, CHOMP is proposing a per-bed factor. Other possible factors and methods to estimate water demand are being considered. Due to these circumstances, a definitive water use projection for the Forest Pavilion project is not available at this time. The District has reviewed the Axiom report but cannot confirm its methodology or its conclusions at this time. There are many unanswered questions, such as evaluating current demand, approved but not built demand and proposed demand. Questions also include the timing of the proposed retrofits and laundry demand associated with the hospital expansion. The District has many areas of research to pursue with this complex proposal.

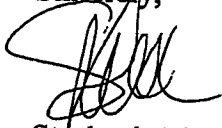
Water Demand Committee Review

The District's Water Demand Committee will be discussing the water demand projection methodology for hospital water use at its next meeting in May 2003. At this time, the District is unable to respond regarding the potential water demand of the Forest Pavilion Project.

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We will be happy to work with the EIR consultant as their and our work on this project continues. The District apologizes for the lack of conclusion on this matter, but appreciates the opportunity to respond to this Draft Environmental Impact Report. If you have questions, please call me at 658-5601.

Sincerely,



Stéphanie Pintar
Water Demand Manager

cc: Board of Directors
Fran Farina, Acting General Manager