

COMMENT LETTERS RECEIVED ON NOP FOR WATER SUPPLY PROJECT EIR

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Date Received	Comment Letter Author	Type	Major Comments
06/26/02	Carmel Valley Association (formerly CVPOA) (Robert Greenwood)	Group	Questions available diversions for ASR; suggests local desal include Moss Landing; concentrate on desal plus some small ASR; describe relationship with Plan B environmental review (how will two reports mesh?)
07/01/02	National Marine Fisheries Service (Patrick Rutten)	Federal agency	Supports limited ASR; has doubts about larger sizes due to streamflow requirements. Opposes additional Carmel River water rights. Notes confusion on MPWMD vs Cal-Am project; Cal-Am and MPWMD need to cooperate on environmentally sound project.
07/03/02	Carmel River Steelhead Association (Roy Thomas)	Group	Focus on ASR: affect of diversion of flow for fish; adequacy of water for diversion. Suggests alternative sources of water for ASR injection. Assess effect of chlorinated water on Seaside Basin; consider Ranney collectors for river diversion.
07/05/02	California Coastal Commission (Stephanie Matraw)	State agency	Suggests preparation of Programmatic EIR first, chose project, then prepare project-level EIR. Concern about inadequate information for broad range of alternatives. Question on rationale for "relaxed conservation." Need to assess diversion effects on Carmel River Lagoon and frequency of artificial breaching. Growth needs to be consistent with LCPS. Need to address archaeology and geology in pipeline alignments.
07/08/02	Monterey Regional Water Pollution Control Agency (Robert Jacques for Keith Israel)	Local agency	Describes urban recycling project underway, with a portion that could be used by Cal-Am. Suggests incentives such as water credits as critical to entice customers to use recycled water. Asks for MPWMD to facilitate dialog with PAC/TAC and SWRCB.
07/09/02	Water for Us (Ed Lee) Two letters urging support of these comments were received from Stella Poland and Gertrude	Group	Requests project level EIR for all alternatives, especially the dam. Compare Plan A vs Plan B total costs; compute cost per cubic 100 feet. Describes existing degraded river; assess effect of each alternative on restoring lower river habitat; what would condition of lower river be with alternatives in place? How much more water from non-dam alternatives is needed to restore flows to pre-1962 levels, and at what cost? Quantify present cost of environmental work on river today; compare to costs with a new dam and with non-dam alternatives. Assess reservoir as a nursery habitat and whether fish can successfully migrate through it (cites example). Series of questions about fish emigration and reservoir overflow. Questions about historical, current and potential size of steelhead runs with and without dam. Assess viability of a hatchery if passage fails (cites example).

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07/10/02	City of Pacific Grove (Judith MacClelland for Mayor Koffman) Letter submitted at July 10, 2002 hearing.	Local agency (city)	Expresses concern about June 6 change to short-term and long-term goals; poses several questions seeking clarification of rationale and ramifications. Requests project purpose give equal importance to providing legal compliance and augmenting supply. Supports analyzing three steps and suggests adding fourth step evaluating year 2020 needs previously estimated by cities in 1999. Refers to MPWMD letter in 1999 and urges broad range of production in EIR.
07/10/02	Holly Keifer Letter submitted at July 10, 2002 hearing.	Indiv	Suggests evaluating option of obtaining 3,500 AF of U.S. Army water rights at Fort Ord; transfer to MPWMD rather than FORA to help reduce Cal-Am unlawful diversions.
07/10/02	World Water SA (Ric Davidge) Letter submitted at July 10, 2002 hearing.	Indiv	Water supply must be secure, reasonable cost, cost-efficient and all facets of costs evaluated. Recommends EIR include water bag technology as a viable alternative; describes positive attributes of water bags, commercial use overseas and notes technology has surpassed Spragg Bag; describes liabilities associated with other traditional alternatives; attaches marketing materials about World Water SA (full brochure on file at District office)
07/10/02	Sean Flavin Letter submitted at July 10, 2002 hearing.	Indiv	Poses questions about basis of 15,285 AF as existing level of Cal-Am production. Poses questions about assumption of 4,000 AF from Seaside. Poses questions about basis for "relaxed conservation" (Step 2). Poses questions about quantity assumed for growth as embodied in Step 3.
07/11/02	John Brennan- e-mail message to H. Stern	Indiv	Limit yield goal to satisfy Order 95-10 only; consider dredging existing dams, especially San Clemente Dam; one alternative must include both ASR + desal along with others; evaluate impacts to immediate surrounding community; growth-inducing impacts are associated with yield over 17,641 AFA; it is appropriate to consider project elements outside District boundaries.
07/11/02	AMBAG (Nicolas Papadakis)	Local agency	No comments at this time.
07/15/02	Richard Heimann	Indiv	Consider importation of water from Central Valley sources or Salinas Basin; use directly or inject into Seaside Basin. Opposed to legalizing existing diversions. Evaluate impact of winter diversion for ASR on steelhead; ensure adequate minimum flows remain (higher than 40 cfs). Assess true availability of water for winter diversion.
07/15/02	Ed Lee for Water for Us (personal letterhead)	Group	Assess drought protection capability of all alternatives and time of satisfaction of Order 95-10. Provide statistical information on drought performance, not just arbitrary standard set by current Board.
07/15/02	City of Sand City (Steve Matarazzo)	Local agency (city)	Need to coordinate with City's EIR on their 300 AF/year desalination project and development of City-owned water system; willing to coordinate both projects if timing is right.

07/15/02	Terry Spragg	Indiv	Consider waterbag technology as a viable less costly alternative in EIR; waterbags should not be excluded from consideration. Requests written response re: MPWMD review of year 2000 Plan B information (cites April 18, 2002 letter).
07/15/02	Charles Burrell	Indiv	Describe difference between MPWMD and Plan B (Keeley AB 1182) process. Specify average cost increase to consumers and sunset dates. Address conflicts with Monterey County General Plan Update as it relates to water augmentation. Expresses concern about community being punished for water conservation by setting of lower target yield. Expresses concern about reduced performance standard for rationing and impact on community. Address cost of implementing and enforcing a reduced standard.
07/16/02	Stephen Lyon	Indiv	Expresses concern re: June 6, 2002 Board changes to project goals and lowered rationing standard; concern about lack of preparation for periodic drought. Broaden scope and evaluate full range of water demands. Assess water needed to: protect area from drought; replace unlawful diversions per Order 95-10; and allow long-standing legitimate planned uses in General Plans to be served.
07/17/02	Monterey County Association of Realtors (Tom Rowley)	Group	Projects need to restore the District's existing approved allocation amount for Cal-Am (roughly 17,500 AF); also address water for future growth as estimated by jurisdictions (roughly 3,500 AF). Evaluate all projects on like-to-like basis; includes project level EIR for each alternative. Total costs must be computed fairly and equally (apples-to-apples).
07/17/02	Ron Cheshire	Indiv	Consider all projects on a project level;, not program level. Compare costs on "true basis (cost per AF, per project, present cost). Goal should be buildout amount (6,500 AF). Long-term goal should be 6,500 AF in additional to base of 17,641 AF allocation. Short term goal should include water from non-dam sources that could be added to the dam to meet long-term needs.
07/17/02	Allen Robinson	Indiv	Quantify "adequate water supply" based on current deficits, needs of lots of record and future growth anticipated in current general plans; add another increment based on historical growth trends; acknowledge that current usage is artificially low due to mandatory conservation. Identify and evaluate a specific project to meet goals, not just a component of a project such as ASR. Study alternative components at the project level, including ASR, dam, desal, and importation from Central Valley Project. Economic impact chapter should include jobs created, housing provided and social costs of project components. Identify quantity and cost of water generated by each alternative; include initial, operating and financing costs. Scientific assertions should be made by outside experts who are not involved with local politics.
07/17/02	Lombardo & Gillis, Attorney for clients Eastwood and Mills (Derinda Messenger)	Indiv	Analyze whether District process is duplicative on Plan B process. Water supply goals are roughly 2,000 AF less than SWRCB replacement amount in Order 95-10; community is being punished for conservation efforts; water supply goal should be at least existing demand. Cites several concerns related to ASR pipeline through Canada Segunda Canyon; may be physically infeasible and adversely affect traffic flow; must address pipeline impacts and alternative routes.
07/17/02	Carmel Development Company (Michael Waxer)	Indiv	Notes concerns re ASR pipelines and impact to approved subdivisions (refers to Lombardo & Gillis letter). Expresses concern about June 6, 2002 Board action setting yield goal and rationing standard. Suggests evaluation of 4 yield goals (lists them) including range of costs and impacts associated with each. Expresses concern about early phases that do not meet community needs. Suggests evaluation of project components associated with a reasonable range of rationing standards (sensitivity analysis) and notes already low water use rates locally. Suggest low end at 20% reduction 10% of the time rather than 15% of the time. Expresses concern about duplication with CPUC Plan B process; how reconcile the two processes?
07/17/02	WWD Corporation	Indiv	General comments about District water supply augmentation efforts, budget, expenditures and policies. EIR should assess all alternatives including desal at

	(David Fuller)		Moss Landing. Assess needs of community as currently zoned; strive to augment supply rather than stopping growth.
07/17/02	Dennis Jones	Indiv	Strongly urges project yield to provide sufficient capacity for economic growth. Expresses concern about diligent conservation by homeowners resulting in reduced supply goal that does not allow remodel or bathroom addition.
07/17/02	Fran Farina , attorney for clients SOCR and CARP Letter received via e-mail attachment and downloaded into H. Stern file	Group	Project yield goals must comply with CPUC Ruling, which reflects goal of 10,730 AF replacement amount to fully comply with Order 95-10; Ruling and AB1182 (Keeley) do not contemplate partial compliance under current constrained situation. Suggests eliminating Step 1 goal of 15,285 AF production target and focus on 17,641 AF as lowest quantity. Recommends No Project be defined as current water rights and discuss impacts and benefits associated with scenario of only 7,376 AF as available Cal-Am supply. Suggests baseline as 11,285 AF from Carmel River and 4,000 AF from Seaside. Must analyze effect of all alternatives on Carmel River. Rationing levels should be identical to those evaluated for Plan A (dam); ensure fair comparison to Plan B. Costs should include capital, O&M, life expectancy and monthly increases to ratepayers; evaluate based on facilities needed to fully legalize water supply. If Plan B becomes a regional desal plant at Moss Landing, how will it be addressed in MPWMD EIR? Supports project level evaluation of dam, desal and ASR in sufficient quantities to replace 10,730 AF
07/17/02	Sierra Club (Gillian Taylor) Note: 07/17/02 refers to letters on EIR scope submitted to MPWMD for April 15 and June 6, 2002 Board meetings, prior to NOP. I will attach these letters for the record but have not summarized them here.	Group	EIR must clarify quantity of "new" water from projects that contribute to total Cal-Am production amounts. Need "apples to apples" comparison of Plan B and dam based on purpose described in AB 1182; focus on solving over-pumping first. If Plan B is analyzed with growth, concern expressed about adequate comparison to dam and bias against series of smaller non-dam projects. Higher yield goals skew projects toward larger sizes. Suggests focusing on Order 95-10 compliance first and water for future needs second. Poses questions about basis of estimate of water for growth, where growth will occur and need to assess cumulative effects. Poses questions about basis of estimates associated with "relaxed" conservation standards. Need to clearly define and clarify in EIR.
07/17/02	City of Monterey (Bill Wojtkowski)	Local agency (city)	NOP does not define near-term and long-term target yields; date or number of years need to be tied to near and long-term. Need to add fourth water supply target for long-term needs. Assess effects if Step 2 water is not used for relaxing conservation, but instead is used for growth or other purpose. Clearly define and evaluate targets.
07/17/02	City of Seaside (Diana Ingersol)	Local agency (city)	Suggests postponing initiation of EIR until final Plan B document is received; coordinate District and CPUC planning efforts. City of Seaside should be identified as a responsible agency. EIR should consider alternative injection well sites as existing sites may interfere with City's redevelopment plans. Noise and vibration issues associated with wells must be evaluated and coordinated with City Plans and zoning; noise mitigation measures must be developed. Production goals are inadequate unless they address existing needs to comply with Order 95-10, relief of current conservation requirements as well as needs associated with legal lots of record. Rationing impacts should include no rationing, 20% at 2% of time, and 20% at 15% of the time. Project should result in zero rationing due to current low water

			use rates. Evaluate proposed dam at project level to fairly compare to Plan B. Why is EIR limited to local desal; need to address final Plan B and coordinate.
07/18/02	City of Carmel-by-the-Sea (Chip Rerig)	Local agency(city)	Fully evaluate dam at project level; fully analyze financial effect of ASR as compared to the dam. Analyze the potential to transfer water rights from U.S. Army to the Fort Ord Reuse Authority with the land transfer process presently in process. Questions artificial split between near-term and long-term goals; EIR should analyze legalizing supply and supply augmentation without dividing up these two purposes.
07/18/02	State Water Resources Control Board (Diane Lawson) (fax of letter; extension to 7/18 granted previously)	State agency	Must clearly define the water rights associated with each project component throughout the year (monthly); clarify assumptions re: existing, amended or new rights. Evaluate impacts associated with pending petitions or new rights. Must clarify Petition for ASR and provide additional information previously requested. Specify detailed rates, timing, locations of diversion for three production scenarios under a range of water conditions. Discuss San Clemente Dam as a diversion point in relation to Order 2002-002. What supply will be used during periods where diversions are not authorized? Baseline conditions should be defined as situation that would exist absent any illegal Cal-Am diversions; assess impacts for three production targets relevant to the suggested baseline, and suggest mitigation measures. Refers to option of regulatory baseline assuming existing MPWMD permits; must evaluate changed permit condition if no dam as compared to conditions with the dam; refers to effect of removing Condition #34 re instream flows. Regardless of baseline chosen, EIR should consider NMFS June 3, 2002 instream flow recommendations. Clarify relaxed conservation option; how will this affect steelhead, frogs and other riparian resources during critical water years? Clarify Carmel River and Seaside Basin production targets; assess impact of Cal-Am withdrawals to Seaside Basin. Suggests arranging a meeting to discuss comments.