



MARINA COAST WATER DISTRICT

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July 30, 2020

Via Email

Board of Directors
Monterey Peninsula Water Management District
5 Harris Court, Building G
Monterey, CA 93940

RE: Proposed Bypass Pipeline and De-Chlorination Facility Modification

Dear Board of Directors:

The Marina Coast Water District (MCWD) absolutely supports the ASR and PWM projects and we want to continue to partner on those projects. MCWD is the owner of the potable water pipeline in General Jim Moore Boulevard that is used for ASR and is a partner with Monterey One Water (M1W) on the PWM Project where MCWD owns the recycled water pipeline and receives advanced treated water for our own needs.

MCWD is concerned about drawings in Addendum No. 6 documents and the staff presentation that clearly show the proposed Bypass Pipeline Project (Project) is intended to be an extension of CalAm's desalination pipeline for CalAm's desalination project. We absolutely oppose the location of the intake wells on the CEMEX property and CalAm's desal project unless and until, at minimum, the intake wells for the desal project are moved to north of the Salinas River.

Further, it appears the use of MCWD's 100% owned potable water pipeline is an essential component of the proposed Project and MCWD has not been consulted about potential environmental and operational impacts on MCWD's pipeline. As the owner of the pipeline that is used to serve both MPWMD's ASR facilities and our future customers in South Ord, we must be involved, understand, and approve any changes to the use of the pipeline. Thus far, insufficient information and analysis have been provided to MCWD as to how operational changes proposed by the Project would impact MCWD's future uses of our pipeline. There is also insufficient information on how the proposed Bypass Pipeline, Cal Am's proposed Desal Pipeline, ASR injection and extraction operations, PWM extraction operations, and the existing MCWD pipeline will be operated together. We are especially concerned with the lack of water quality analysis on the mixing of these various sources of water within our pipeline. Since multiple parties and multiple sources of water and infrastructure appear to be tied together in this Project, it is imperative to have agreement on an operations plan before approval of the Project to define how to respond to water quality or pressure issues, metering of sources, future tie-ins or changes to the

operations, and allocation of operating and capital costs. It may also be necessary for all parties to consult the Department of Drinking Water to ensure compliance with all operating permits.

In contrast to moving ahead on the costly Project, there is a simple cost-effective solution that should be explored prior to approving Addendum No. 6 and the Project. Cal Am owns Water Right Permit 21330 that allows Cal Am to divert 1,488 AFY of Carmel River water during the same December through May ASR period and with the same protective steelhead bypass flow conditions as the ASR permits. Unlike water under the ASR permits that first must be injected into the Seaside Basin and then extracted for direct use, Permit 21330 water may be used directly to serve Cal Am customers. However, the authorized place of use is limited to the Carmel River watershed, i.e., the Carmel Valley and about 50% of the City of Carmel. Permit water may not be delivered to the Forest Lake Tanks. Cal Am should petition the SWRCB to amend Permit 21330 to have the same authorized place of use as the ASR permits, i.e., within the boundaries of the entire MPWMD. The existing steelhead protective measures would remain unchanged, continuing to protect Carmel River resources.

Unlike the proposed Project that would deliver ASR water only via the limited capacity of the Segunda/Crest Pipeline, this alternative would deliver Carmel River water via Cal Am's existing Carmel Valley pipeline system directly to the Forest Lake Tanks during the same December through May period. Besides saving the cost of building a new bypass pipeline and dechlorination facility, Cal Am would also save the additional costs of (1) pumping the water over the hill via the Segunda/Crest Pipeline, (2) dechlorinating and injecting the water into the Seaside Basin, and (3) extracting and re-chlorinating the same quantity of PWM water from the Seaside Basin. If the Seaside Basin water is still needed then PWM, ASR or native groundwater could still be extracted and delivered to the Seaside-Old Monterey area and/or the Forest Lake Tanks.

Also, amending the Use of Permit 21330 provides greater flexibility in managing Carmel River water. For example, if sufficient water reserves are already stored in the Seaside Basin, Carmel River water could directly serve the south of Old Monterey service area during December through May, as is being done now. Any excess water not needed for direct use could continue to flow via the New Monterey Pipeline to the Seaside Basin for ASR injection. Amending and using Permit 21330 to serve all of the MPWMD area achieves the Bypass Project objectives without the need to construct new capital facilities.

Compared to this cost-effective solution, the proposed Project is subject to significant limitations on ASR Water Availability. Carmel River flows may only be diverted for ASR injection during December through May and only if river flows are in excess of the steelhead bypass flow requirements. There is no guarantee that any water will be available for ASR injection. For example, from CY 2010 through 2019 (10 years), ASR flows were only diverted 5 times during December and only 4 times during May. The Project proposes to use the Segunda/Crest Pipeline, which only has a capacity of 700 gpm (1.56 cfs or 3.09 AF per day). For the months of December and May, that means a maximum of 96 AF per month that ASR water could be delivered for injection under the Project, assuming that water will be diverted all 31 days of each month.

In October 2019, the MCWD Board publicly stated in a report that MCWD's potable water pipeline in General Jim Moore Boulevard has sufficient capacity for ASR, PWM, PWM Expansion, and MCWD's projected South Ord use and the MCWD Board has appointed me as the District's negotiator for the use of the pipeline by MPWMD and/or Cal Am for PWM and PWM Expansion. MCWD requests that the MPWMD defer approval of the Addendum No. 6 until MCWD and MPWMD have had the opportunity to discuss and continue to work together on the use of MCWD's pipeline to ensure optimization of ASR and PWM water while allowing MCWD time to review and approve changes to its pipeline to ensure any changes do not impact our ability to use the pipeline for our own needs.

Sincerely,

A handwritten signature in blue ink, appearing to read "K. Van Der Maaten", with a long horizontal flourish extending to the right.

Keith Van Der Maaten
General Manager