

<p>Issue #1 - Absence of Cost Estimates and Engineering Trade - Offs - How much is the production of AWTF expected to cost to build and operate? Is it competitive with alternatives?</p> <p>The Advanced Water Purification Facility (AWPF) component of the Pure Water Monterey (PWM) Project will cost approximately \$46 million. Operation is expected to cost approximately \$2.5 million per year. The overall “Soft Cap” cost listed in the Water Purchase Agreement for the first year is \$1,720 per acre-foot. That cost is competitive with the life cycle cost of the incremental desalination facility costs as agreed to by California American Water (Cal Am) and the Office of Ratepayer Advocates.</p>	<p>Comment Letter F</p>
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<p>Issue #2 - What is the status of the California Public Utilities Commission (CPUC) Draft Water Purchase Agreement (WPA)?</p> <p>On September 15, 2016, the California Public Utilities Commission (CPUC) voted 4-0 to authorize Cal Am to enter into a revised Water Purchase Agreement (WPA) between Monterey Peninsula Water Management District (MPWMD) and the Monterey Regional Water Pollution Control Agency (MRWPCA). This agreement was part of the Phase 2 resolution to allow the PMW Project to move forward. The entire decision can be viewed at:  <a href="http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M167/K189/167189425.pdf">http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M167/K189/167189425.pdf</a></p> <p>This Water Purchase Agreement between the three agencies was executed on September 19, 2016. The Water Purchase Agreement can be viewed at:  <a href="http://purewatermonterey.org/wp/wp-content/uploads/Water-Purchase-Agreement.pdf">http://purewatermonterey.org/wp/wp-content/uploads/Water-Purchase-Agreement.pdf</a></p>	<p>Comment Letter F</p>
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<p>Issue #3 – Will superior alternative sources of water be evaluated?</p> <p>The PWM Project is a critical component to the solution for Monterey Peninsula’s chronic water shortage and comply with the State Water Resources Control Board’s (SWRCB) mandate to reduce pumping from the Carmel River. Under current schedule projections, 3,500 acre-feet per year of water will be available to supplement the Monterey Peninsula water supply by 2018.</p> <p>In addition, the PWM Project is advanced in its planning process and thus is well-positioned to provide an additional source of water. California Environmental Quality Act (CEQA) review has been completed through a certified Final Environmental Impact Report (Final EIR) and the Project is well on its way through the permitting process.</p>	<p>Comment Letter F</p>
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<p>During the CEQA process, MRWPCA completed an exhaustive alternatives analysis in Chapter 6 of the PWM Project’s Final EIR, which built upon decades of water supply planning in Cal Am’s Monterey District. The Salinas River diversion alternative suggested by the commenter was analyzed and rejected in the Final EIR as infeasible for technical and legal reasons. See PWM Project Final EIR at 6-7 to 6-9. This finding is consistent with prior examinations of potential diversions from the Salinas River.</p>	
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<p>Issue #4 - What is the extent of the pollution from the Salinas Basin (including Blanco Drain) water and the implication of these pollutants to human health?</p> <p>California has established numerous state laws, regulations and policies governing the use of recycled water for groundwater replenishment to protect groundwater quality and public health. Studies have been conducted for other potable reuse projects similar to the PWM Project, including epidemiology studies, risk assessments, and investigations that analyze and compare the toxicological properties of recycled water to those of drinking water. These studies have shown that (1) there is no association between the use of recycled water and adverse health outcomes in individuals consuming groundwater containing recycled water; and (2) purified recycled water from an appropriately designed and operated AWPFF Facility, such as the PWM Project, presents less risk to human health in terms of regulated chemicals, pathogens, and trace organics compounds compared to the risk from conventional drinking water sources.</p> <p>Based on analytical results of the source waters to be used for the PWM Project, the pilot plant testing, information on the predicted performance and water quality of the proposed full-scale AWPFF Facility, and other existing groundwater replenishment projects and related research/studies:</p> <ul style="list-style-type: none"> <li>• The PWM Project will comply with all applicable groundwater replenishment regulations and will meet all Central Coast Basin Plan standards, objectives, and guidelines.</li> <li>• An independent advisory panel of technical experts (including experts in the areas of public health, groundwater, treatment technologies and water recycling), and staff from the State Water Resources Control Board Division of Drinking Water (DDW) have thoroughly reviewed and commented multiple times on design and planned operation of the PWM Project. The technical experts and DDW staff have found the PWM Project for its intended purpose of supplying water for indirect potable reuse. On October 6, 2016, the DDW has no additional comments on the submitted summary of public comments and revisions to the Engineering</li> </ul>	<p>Comment Letter G</p>
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<p>Report. DDW will prepare an Engineering Report acceptance letter and recommendations on permit provisions to the Central Coast Regional Water Quality Control Board (Regional Water Board). The Regional Water Board is now developing a permit for Groundwater Replenishment with Recycled Water (Waste Discharge Requirements/Water Recycling Requirements) that will ensure operation of the PWM Project will comply with laws, regulations, and policies protecting public health.</p> <ul style="list-style-type: none"> <li>• The full-scale AWPf Facility and injection of purified recycled water will provide the required reliability and redundancy through use of multiple, sequential treatment barriers and environmental barriers (i.e. underground storage, attenuation and response time).</li> </ul>	
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<p>Issue #5 – Why hasn't nanofiltration been considered since this is the gold standard for water purification?</p> <p>Reverse osmosis (RO), which will be implemented in the AWPf facility, yields better water quality than nanofiltration because RO rejects both divalent and monovalent ions, whereas nanofiltration primarily rejects divalent ions (large ions) and passes monovalent ions (small ions). Likewise, RO also does a better job of removing organics and other constituents when compared with nanofiltration. Because RO provides better performance, DDW requires the use of RO for groundwater injection projects like the PWM Project. MRWPCA verified RO performance during the six-month long pilot study, which demonstrated that the RO permeate water quality is protective of public health when combined with the ultraviolet light advanced oxidation process (UV/AOP).</p>	<p>Comment Letter G</p>
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<p>Issue #6 – Have environmental justice concerns been addressed for the PWM Project?</p> <p>Human health effects were evaluated in the PWM Project Final EIR and in the soon to be approved by DDW, the Engineering Report. As noted in Issue #4, studies have shown that (1) there is no association between the use of recycled water and adverse health outcomes in individuals consuming groundwater containing recycled water; and (2) purified recycled water from an appropriately designed and operated AWPf, presents less risk to human health in terms of regulated chemicals, pathogens and trace organic compounds compared to the risk from conventional drinking water sources. As such, there are no disproportionately high and adverse human health or environmental effects on minority populations and low-income populations that would occur from the use of PWM Project water.</p>	<p>Comment Letter G</p>
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<p>Issue #7 - Is this decision being made with a sense of what it might mean to future generations?</p> <p>Pure Water Monterey provides both purified potable water for domestic use, which reduces the risk of saltwater intrusion in the Seaside Basin, as well as additional recycled water for irrigating one of the state’s most fertile agricultural areas in the Salinas Valley. Both supplies will be benefiting future generations in the area. Additionally, MRWPCA carefully considered the future potential impacts of the PWM Project. On October 8, 2015, the MRWPCA Board approved the PWM Project, after certifying that the PWM Project’s Final EIR was prepared in compliance with CEQA and the CEQA Guidelines, which are found in Title 14 of the California Code of Regulations, commencing with section 15000. The MRWPCA Board Findings regarding significant impacts on the environment, mitigation for those impacts, and alternatives that may avoid or reduce significant environmental impacts in accordance with CEQA and CEQA Guidelines are located in the Consolidated Final EIR Volume IV. No lawsuit was filed within the 30-day statute of limitations to challenge the PWM Project’s approval or the adequacy of the Final EIR. In addition, the CPUC approved the Water Purchase Agreement between Cal Am, MPWMD, and MRWPCA on September 15, 2016. The CPUC also adopted the required CEQA findings concerning environmental impacts, mitigation measures, and alternatives.</p>	<p>Comment Letter G</p>
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<p>Issue #8 - Is the City of Seaside as a stakeholder?</p> <p>Yes, MRWPCA and the Fort Ord Reuse Authority (FORA) have always considered each land use agency a stakeholder in the PWM Project as assured by FORA Master Resolution which provides that each land use agency shall include policies and programs in their respective applicable general, area, and specific plans to address water supply and water conservation, including “active participation in support of the development of “reclaimed” or “recycled” water supply sources by the water purveyor and the Monterey Regional Water Pollution Control Agency to ensure adequate water supplies for the territory within the jurisdiction of the Authority.”</p> <p>To that end, MRWPCA has solicited City of Seaside input on the PWM Project’s CEQA process, through contact with the Water Master, through the Drinking Water Permit process, and the easement acquisition process.</p>	<p>Comment Letter H</p>
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<p>Issue #9 - Considering there are several users with wells that produce water from the Seaside Basin, how would you ensure that all of the water injected into the Seaside Basin would be extracted by Cal Am?</p> <p>Water injected into the Seaside Basin will mix with ambient groundwater and flow in a downgradient direction as controlled by hydraulic gradients and groundwater pumping. As soon as the PWM Project water is injected into the aquifer, it immediately contributes to the groundwater in storage and increases the basin yield by an equal amount. Regardless of which wells actually recover the molecules of PWM Project water, Cal Am can increase pumping in an equal amount and the safe yield of the groundwater basin is maintained. Nonetheless, most of the PWM Project water is expected to be recovered directly by Cal Am wells due to the patterns of groundwater flow in the basin. Current hydraulic gradients direct groundwater beneath the injection facilities area toward the large, nearby Cal Am pumping wells, including Paralta, Ord Grove, and the four ASR wells. Nonetheless, some PWM Project water molecules may bypass these wells and migrate downgradient to other wells, depending on the then-current pumping patterns in the Seaside Basin.</p>	<p>Comment Letter H</p>
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<p>Issue #10 - Is it necessary or possible for the City of Seaside to enter into a water purchase agreement with MRWPCA and MPWMD?</p> <p>No, the Water Purchase Agreement is a CPUC-approved agreement between Cal Am, MPWMD and MRWPCA.</p>	<p>Comment Letter H</p>
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<p>Issue #11 - Will the water injected into the Seaside Basin aquifer be regulated by the surface water treatment rule?</p> <p>Water injected into the aquifer will be regulated by the California's Title 22 Regulations for Indirect Potable Reuse: Groundwater Replenishment, effective June 18, 2014.</p>	<p>Comment Letter H</p>
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