

ATTACHMENT 2

August 22, 2016 Pure Water Monterey Project Public Hearing

Comment Cards and Letters Received (Letters A to O)

August 28, 2016

Yohana Vargas – Administrator
MRWPCA
5 Harris Ct., Building D
Monterey, California 93930

Dear Ms. Harris,

I attended the August 22 hearing of the Division of Drinking Water of the California SWRCB at the MRWPCA board room. I made verbal comment and submitted a comment card. I would like to add the following documents which I referenced in my oral comments.

The concern is that Source waters for Pure Water GWR project are using 303(d) impaired waters in the project, specifically Blanco Drain and the Salinas Reclamation canal. I ask again, has the testing to date involved these specific waters? How can we be reassured that these toxic substances are not ending up in our drinking water, in the Seaside Aquifer, or in the Monterey Bay Sanctuary at the end of the outfall pipe?

Please include this in the public record for the draft engineering report of this project.

Thank You,



Michael Baer
Monterey, California

2 enclosures

a) Central Coast RWQCB except Res. # R3-2016-0003

b) " " " " 2014 Integrated Report
Appendix A, Table (Blanco & Rec. Canal)

		Revisions				
Waterbody Segment Name	Pollutant Name	No Change to 303(d) List	Pollutant Name Change	Add to 303(d) List	Remove From 303(d) List	Other Revisions
Bennett Slough	Chlorophyll-a	X				
	Oxygen, Dissolved	X				
	pH	X				
	Turbidity			X		
Big Creek (Big Sur Coast)	pH			X		
Blanco Drain	Chlorpyrifos					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	DDD			X		
	DDE			X		
	Diazinon					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Nitrate		X			TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Oxygen, Dissolved				X	TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Pesticides				X	
	Toxicity		X			
	Turbidity	X				

			Revisions			
Waterbody Segment Name	Pollutant Name	No Change to 303(d) List	Pollutant Name Change	Add to 303(d) List	Remove From 303(d) List	Other Revisions
Rincon Creek	Toxicity		X			
	Turbidity				X	
Rodeo Creek Gulch	pH	X				
	Turbidity	X				
Romero Creek	pH	X				
Salinas Reclamation Canal	Ammonia		X			TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Chlorpyrifos					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Copper	X				
	Diazinon					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Escherichia coli (E. coli)					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Fecal Coliform					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Malathion			X		
	Nitrate					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.

		Revisions				
Waterbody Segment Name	Pollutant Name	No Change to 303(d) List	Pollutant Name Change	Add to 303(d) List	Remove From 303(d) List	Other Revisions
Salinas Reclamation Canal	Oxygen, Dissolved					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Permethrin, total			X		
	Pesticides				X	
	pH	X				
	Priority Organics	X				
	Toxicity		X			TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Turbidity	X				
Salinas River (lower, estuary to near Gonzales Rd crossing, watersheds 30910 and 30920)	Benthic Community Effects			X		
	Chlordane	X				
	Chloride	X				
	Chlorpyrifos					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	DDE			X		
	DDT		X			
	Diazinon					TMDL status changed from TMDL Required to Being Addressed by Completed TMDL.
	Dieldrin	X				

**CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD 895 Aerovista Place,
Suite 101
San Luis Obispo, CA 93401-7906**

RESOLUTION NO. R3-2016-0003

**AMENDING THE WATER QUALITY CONTROL PLAN FOR THE CENTRAL COASTAL
BASIN TO ADOPT TOTAL MAXIMUM DAILY LOADS FOR SEDIMENT TOXICITY AND
PYRETHROID PESTICIDES IN SEDIMENT IN THE LOWER SALINAS RIVER WATERSHED**

(excerpted. . .)

4. Multiple waterbodies within the lower Salinas River watershed are listed on California's Clean Water Act section 303(d) list (303(d) List) for water quality impairments due to sediment toxicity. Additionally, multiple impairments not identified on the current 303(d) List were identified during development of the TMDL; the additional impairments are due to sediment toxicity and the presence of pyrethroid pesticides in sediment. Current 303(d) Listings and the additional impairments, all of which are addressed in the TMDL, are summarized in the table below. Due to the 303(d) Listings, the Central Coast Water Board is required to adopt a TMDL and an associated implementation plan (40 CFR [Code of Federal Regulations]130.6(c)(1) and 130.7; California Water Code section 13242).

5. The Central Coast Water Board is also undertaking this action under its authority in Porter-Cologne. This TMDL establishes a program of implementation for achieving water quality

objectives for the additional impairments identified during the development of this TMDL that are not yet listed on the 303(d) List. (California Water Code section 13242.)

Waterbody	303(d) Listed Pollutant	1
		Additional Impairments
Alisal Creek	--	Sediment Toxicity, Pyrethroids
Alisal Slough	Sediment Toxicity	--
Blanco Drain	--	Sediment Toxicity
Chualar Creek	--	Sediment Toxicity
Espinosa Slough	Sediment Toxicity	--
Gabilan Creek	Sediment Toxicity	--
Merrit Ditch	Sediment Toxicity	

objectives for the additional impairments identified during the development of this TMDL that are not yet listed on the 303(d) List. (California Water Code section 13242.)

Waterbody	303(d) Listed Pollutant	Additional Impairments ¹
Alisal Creek	—	Sediment Toxicity, Pyrethroids
Alisal Slough	Sediment Toxicity	--
Blanco Drain	—	Sediment Toxicity
Chualar Creek	--	Sediment Toxicity
Espinosa Slough	Sediment Toxicity	—
Gabilan Creek	Sediment Toxicity	--
Merrit Ditch	Sediment Toxicity	
Natividad Creek	Sediment Toxicity	Pyrethroids
Old Salinas River	Sediment Toxicity	—
Quail Creek	Sediment Toxicity	—
Salinas Reclamation Canal	Sediment Toxicity	Pyrethroids
Salinas River (lower)	—	Sediment Toxicity, Pyrethroids
Tembladero Slough	Sediment Toxicity	Pyrethroids

¹ Additional impairments are exceedances of water quality objectives in waterbodies identified during TMDL development and subsequent to the most recent 2010 303(d) listing cycle.

6. Waters described as additional impairments in Finding 4 are impaired due to the pollutants described in Finding 4. The additional impairments are not waters currently listed as impaired on the Clean Water Act section 303(d) List. However, the additional impairments qualify for inclusion on the 303(d) List per in the Water Quality Control Policy for Developing California's Clean Water Act Section 303(d) List (State Water Board Resolution No. 2004-0063). The Central Coast Water Board is developing the 2016 303(d) list that will be submitted to the State Water Board for approval. Alisal Creek, Blanco Drain, Chualar Creek, and Salinas River (lower) will be included in the draft 2016 303(d) list for sediment toxicity. As well, the Salinas Reclamation Canal will also be included for permethrin. The other waterbody/Pyrethroid combinations do meet the criteria for inclusion but some of the data relied upon by staff occurred after the cutoff for scientific data in the 2016 303(d) list. Therefore the Central Coast Water Board is asking the State Water Resources Control Board (State Water Board) to also include these impairments on the 2016 303(d) List.
7. The Central Coast Water Board's goal for establishing TMDLs as described in the Basin Plan is to protect and restore beneficial uses of surface waters, which rely on established water quality objectives. There are two general narrative water quality objectives that pertain to the pesticide TMDL. One is the general objective for toxicity and the other is the general objective for pesticides. They are described as follows:

General Objective for Toxicity: All waters shall be maintained free of toxic substances in concentrations which are toxic to, or which produce detrimental physiological responses in, human, plant, animal, or aquatic life. Compliance with the objective will be determined by use of indicator organisms, analyses of species diversity, population density, growth anomalies, toxicity bioassays of appropriate duration, or other appropriate methods.

Letter A



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: Michael Baer

Affiliation: Monterey Resident

Email: mgbisme@yahoo.com

Mailing Address: on file

Phone Number: 831-601-2788

Comments: I have questions about source
waters from the Reclamation Ditch
and the Blanco Drain?

and what is in the R.O. concentrate
that is sent out to sea through
the outfall?

Has the water in the draft engineering
report been tested inclusive of
blanco drain & reclamation canal?

Continued on back



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: PARISE

Affiliation: _____

Email: jhparise@aol.com

Mailing Address: _____

Phone Number: _____

Comments: _____

B-3

1) Please specify for the record, what water quality standards apply to the water to be produced by the Pure Monterey Project

B-4

2) If the water does not meet the water quality standard, what will MRWPCA do?



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: HARVEY E. BILLIG JR., M.D.

Affiliation: SELF PWN

Email: hbillig@sbcglobal.net

Mailing Address: PO Box 1414
CARMEL, CA. 93921

Phone Number: 831-626-3826

Comments: Concerned about public health
aspects and permits for use
of Blanco Drain water.

Studies show up to:

C-5

1,062.5 X standard for Diazinon

41 X standard for Nitrate

148 X standard for NH₃

Where are the approvals for

C-6

the final product with the
Blanco Drain in the mix

100% safe

Continued on back

Seaside Groundwater Basin Watermaster
 PO Box 51502
 Pacific Grove, CA 93950

August 22, 2016

Yohana Vargas
 Contracts Administrator
 Monterey Regional Water Pollution Control Agency
 5 Harris Court, Building D
 Monterey, CA 93940

Subject: Pure Water Monterey Project Title 22 Engineering Report

The Seaside Basin Watermaster submits the following comments on this document:

The proposed RRT plan may be overoptimistic in terms of the time that will be required to (1) assess results with DDW and RWQCB (only 1 week is provided for this process), and (2) procure a safe interim drinking water supply (only 1 week is provided for this process).

D-8

- The Report states that the time required for MRWPACA, DDW, and RWQCB to assess the sample results and make decisions regarding the appropriate response(s) is estimated to be 1 week. It seems unlikely that those two regulatory agencies could meet with project staff, review the findings, and reach agreement on decisions to address the findings in such a short time.
- The Report states that the time required for MRWPCA to collaborate and coordinate with regulatory agencies and stakeholders to suspend replenishment operations and, if necessary, to provide relief measures or an alternative water supply is estimated to be one week. The Report describes the steps that would be carried out in this process as:
 - Notify Well Owner and Coordinate Appropriate Actions
 - Confirmation Sampling in Monitoring Wells Adjacent to Injection Well Field
 - Initiate Accelerated Groundwater Quality Sampling in Downgradient Monitoring Wells and Water Supply Wells: Anticipate Downgradient Water Supply Wells that may be Impacted
 - Suspend Operation of the Drinking Water Well if Impacted
 - Consider Blending Options
 - Shift Production from Impacted Well to other Existing Wells
 - Initiate Wellhead Treatment Planning and Secure Wellhead Treatment as Appropriate
 - Continue Well Suspension, Provide Bottled Water, and/or Consider Additional Wells

D-9

It is difficult to believe that all of these steps could be carried out in a one week period. In particular, initiating and procuring wellhead treatment systems and putting them into

operation, installing additional wells, and blending water sources. The Report uses the term "...replace the potable water supply in some other manner..." but does not identify what those might be. This suggests that no other manner(s) could be identified by the authors of the Report.

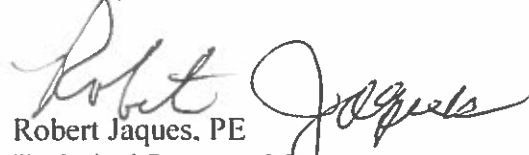
D-7

It would be good for the Project sponsor to reexamine these issues and to revise its RRT analysis accordingly to reflect more realistic timelines for certain of the actions.

The Report notes that routine groundwater monitoring reports and other types of Project reports will be submitted to the State. It would be good to have the Seaside Basin Watermaster included in this distribution so the Watermaster can stay abreast of impacts and actions associated with the Project and its compliance with applicable regulatory requirements.

Thank you for your attention to these comments. If you have any questions please contact me at (831) 375-0517 or by email at boj83@comcast.net.

Sincerely,



Robert Jaques, PE
Technical Program Manager
Seaside Basin Watermaster

Additional Comments: Bob Jaques

I just found in my notes from the Watermaster TAC's recent meeting at which the TAC received Mr. Holden's presentation and discussed the Engineering Report, that two additional comments had been raised.

D - 10

1. The California American Water representative commented that use of "bottled water" as a response action in the event of groundwater quality problems being discovered was not a realistic or viable response action.

D- 11

2. The City of Seaside representative commented that asking well owners to discontinue use of their well as a response action in the event of groundwater quality problems being discovered was not a viable action in situations where there is no other source of water that could be used to supply the demand. That is the case in the City of Seaside's Municipal Water System.

Can you please include these comments along with those in the letter I sent you?

Thanks,

Bob Jaques

Technical Program Manager

Seaside Basin Watermaster

83 Via Encanto

Monterey, CA 93940

Office: (831) 375-0517

Cell: (831) 402-7673

Yohana@mrwpca.com



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: BROU MEHRINGER

Affiliation: _____

Email: mehringer csm@yahoo.comMailing Address: 763 SPENCER ST.
MONTEREY CA 93940Phone Number: 831-601-4742

Comments: _____

1). Blanco drain is the most polluted water area per state of CA - why is it being planned to supply water for this project?

2). What pesticides have been tested for in the blanco drain?

Continued on back

3). How is mrwpa planning to treat all the pesticides in the Blanco drain?

4). Why not use another water source that is not so polluted for a water source?

5). What is the plan for the addition 12 permits to be obtained that are required for this project?

6). An enjection problem today can last for many generations - this project must be it right the first time!!

Comment from: David Beech

August 29, 2016
 Monterey Regional Water Pollution Control Agency
 5, Harris Court, Building D
 Monterey
 CA 93940

PUBLIC COMMENT

Re: Pure Water Monterey Groundwater Replenishment Project Public Hearing on August 22, 2016

Executive Summary

The Engineering Report submitted to the above Public Hearing is seriously deficient, both in what it does and does not cover, concerning the adequacy and cost of the proposed design.

Moreover, the California Public Utilities Commission is already close to adopting a Water Purchase agreement based on this design, without any valid basis for the “soft cap” price proposed, and possibly before the State Division of Drinking Water has approved the project.

Recently, a superior and much cheaper source of water has been identified, available in greater quantity and requiring much less purification.

Hence this Engineering Report should either be withdrawn and replaced by the Monterey Regional Water Pollution Control Agency, or should be rejected by the State Division of Drinking Water if forwarded to them.

1. Inadequate Evidence for Successful Cost-Effective Purification

Water sources such as the Blanco Drain and Reclamation Ditch are among the most toxic in California, and hence raise the questions of whether it is even scientifically possible to purify them to be potable, and, if so, whether it can be done at an acceptable cost.

Any company investing its own money in a risky project like this would want to see much more convincing answers to these questions than provided in this Engineering Report, which appears to have been produced by proponents of the project without any challenging peer review. There are tell-tale signs of potential problems, but these are waved aside since any failures or additional costs are expected to be borne by the ratepayers.

For example, in “9.4.4.1. Constituents Exceeding California Primary MCLs” (p. 9-42), several red flags are raised in Table 9-6, including excessive levels of Lead and Arsenic – the latter, a celebrated favorite of poisoners, coming in at 21 times the permitted California Primary MCL! Instead of treating these as potentially fatal flaws in the proposed purification process, the Report blames excessive turbidity, and proposes to alter the lab tests to reduce the effects of turbidity, instead of facing the evidence head-on and examining what the turbidity is likely to be over years of actual pumping from these water sources, and evaluating the worst-case scenarios. In the short time available to me to scan the Report, this alone was enough to undermine my confidence in the scientific reliability of the output water quality promised.

If the Report reaches the Division of Drinking Water, the experts there may carry out this kind of exacting peer review, but it would be preferable if MRWPCA, as the lead agency, took the responsibility for making their best shot at these needed improvements before requesting that next level of review.

Once the scientific case has been established that truly potable water can be produced, a much more comprehensive test than the Pilot Test and subsequent selective testing is necessary in order to establish the actual cost and reliability of a production system. The present incomplete status was indicated in the oral presentation at the above Hearing by a presenter who referred to the level of some constituent being further lowered in some procedure that had not been integrated into the testing system. So how much more costly would the system become as all necessary refinements were integrated?

The capital and operational costs of dealing with some of the highly impure source water for Pure Water Monterey will become especially significant when we come, below, to mentioning a much simpler and cheaper alternative source. And yet this Engineering Report has virtually nothing to say on the subject of costs.

2. Absence of Cost Estimates and Engineering Trade-Offs

Engineering is all about practicality – designing something that can be built, usually to be durable, and to satisfy various requirements, among which cost constraints are always a major factor. This typically involves consideration of alternatives, and decisions based on trade-offs between them.

The subject Report is very light on any such analysis or rationale, and hence is seriously deficient. The outcome is that cost estimates have to be prepared by others, who are less well-informed than the designing engineers, and, in particular, may be over-optimistic since they do not understand the severity of the problems passed over lightly in the Report.

So how much is the production Advanced Treatment Facility expected to cost to build and operate? Is it competitive with alternatives?

3. CPUC Draft Water Purchase Agreement

Already at the California Public Utilities Commission, ALJ Gary Weatherford has recommended to the Commissioners that they approve a Water Purchase Agreement for California-American Water to purchase specified quantities of water produced by Pure Water Monterey at a specified “soft cap” price (which is no cap at all, since it may be raised if costs increase).

This irregularity of timing, when MRWPCA’s design has not yet been approved, raises the questions of who is the lead agency here, and who is qualified to set the price for the water in a way that is fair to residential ratepayers, who have been given little opportunity to participate. Indeed, the fragmentation of the permitting process looks like piecemealing that has the effect of minimizing that participation.

For example, where and when is the forum for public comment on the costs of PureWaterMonterey, and, at this date, what is the chance of any comment having any influence whatsoever on the outcome?

4. Superior Alternative Source of Water

Although the Pure Water Monterey project is far along in the planning process, it has serious problems, and it is never too late to avert a hundred-million dollar disaster (much more than that if the controversial pipeline is included).

Before proceeding further, MRWPCA should make a thorough evaluation of an alternative water source, namely wet-season diversion of surface water from the Salinas River in the rubber dam area to the MRWPCA treatment plant, and thence for storage in the Seaside Aquifer. This would only be for water that was unused for

agricultural or CSIP purposes, and would otherwise run out to sea. When the Monterey Peninsula Water Management District began to investigate this in 2013, they regarded it as a win-win proposition, but were persuaded that it could never happen, presumably for political reasons. In the light of the critical situation for Monterey Peninsula water supply, and continued overpumping of the Carmel River, it is time to publicly revisit any political objections. If the main objection is that the agriculture industry would rather that the water ran out to sea than that it should help solve the Peninsula crisis, this can surely be overcome.

Given that the Seaside Aquifer has an estimated capacity of 54,000 acre-feet, a study should be carried out, using existing rainfall and river flow records over many years, to determine how much water could be pumped, say through a 36-inch pipe, during the several wet weeks of typical winters, to top up the Seaside Aquifer until it reached capacity, and then for how many drought years this Aquifer could be drawn down to supplement desalinated water to provide uninterrupted supply to the Monterey Peninsula (as well as to other users of that aquifer).

Since the water rights to this surface water are controlled by the State Water Resources Control Board, the possible use, or modification, of the existing 1952 permit needs to be urgently examined for this municipal use of the diverted water.

Respectfully submitted,

David Beech

dbeech@comcast.net

Residential Cal Am Ratepayer
Board Member, WRAMP (Water Ratepayers Association of the Monterey Peninsula)
and PWN (Public Water Now)

Yohana Vargas
 Contracts Administrator
 5 Harris Court Building D
 Monterey, CA 93940

To Whom it Concerns:

I attended the meeting re: the Pure Water Monterey Project hosted by the MRWPCA on August 22, 2016 hoping to obtain answers to my questions regarding the project in the belief that there would be time for questions to be answered as noted in the announcement for the event. We were then told no questions would be taken and that if we wanted our input to have greater effect we should communicate in writing. We were in essence told to talk amongst ourselves. Consequently I still hope that someone will answer my questions. Please respond to this e-mail.

My most fundamental concern is the assumption that the highly polluted water to be recycled and injected into the Seaside Aquifer can be safely purified. By safe I do not mean to that this water will meet a regulatory standard established by a government agency since the current science regarding metabolic disruptors and endocrine disruptors shows these standards to be wholly inadequate (surely your planning process has taken this into account?). Has the planning staff taken into account the: Parma Consensus Statement on Metabolic Disruptors, The statement of principles from the Endocrine Society Endocrine Disrupting Chemicals and Public Health, and current research regarding bioassays for these chemicals?? If these guiding principles have not be considered, then the project has been designed based on the false assumption about what constitutes safe healthy water.

The water to be recycled comes from the Salinas Basin including the Blanco Drain and from pesticide wash water: some of the most polluted waters in the state and water which has been shown to contain metabolic and endocrine disruptors. I had hoped to ask if the project planners could state the extent of this pollution and the implication of these pollutants to human health. Please respond.

As regards the techniques to be used to remove the pollutants we heard a lot about microfiltration and % reduction not exact figure for final concentrations. It is unlikely this will be sufficient to produce safe healthy water. Endocrine and metabolic disruptors act in parts per billion and parts per trillion; therefore, micro filtration will not be sufficient. Why hasn't nanofiltration been considered since this is the gold standard for water purification? Does cost trump Health ? I hope not. Advanced oxygenation techniques will not reduce these chemicals to Carbon dioxide and water. These techniques are based on the hydroxyl radical (. OH) which breaks molecules apart by stripping electrons from their chemical bonds thus producing different compounds called transformation products. Have these transformation products been identified? Are the health effects of these transformation products known?

Experts within the field of toxicology are stating that the effects of endocrine and metabolic disrupting chemicals cannot be characterized through current concentration standards since their effects occur at extremely low doses. The appropriate methods are to use bioassay techniques such as Toxcast tm. Is the project going forward with bioassays? If not Why?? Of course all this testing and monitoring is expensive: who will do this? How Often? At what expense? I hope to receive answers to these questions, please respond.

I also have questions regarding Environmental Justice. If you want to stop polluting the environment the application of the environmental principle where "the polluter pays" is a necessary step. Who contaminated this water? Why should the ratepayers of the Monterey Peninsula bail out the agricultural interests in the Salinas Valley. Those responsible for the pollution should do the right thing and clean up the mess. Will they? Another point is who will be drinking, cooking, and bathing with this water? This water is from the Seaside aquifer. How is this water distributed throughout the CalAm system? Will the residents of Pebble Beach, Carmel, Carmel Valley be drinking this recycled "Pure Water" at the same concentrations of Seaside and New Monterey?

One last comment: Is this decision being made with a sense of what it might mean for future generations? I ask this because it seems to be there exists a feeling of panic and hysteria about our water supply. How did we get here in the first place? Were reasonable decisions made that resulted in the overdraft of the Seaside aquifer, the illegal taking of thousands of acre feet from the Carmel River basin, the horribly polluted Salinas river basin and the Blanco Drain ? A local politician recently said, "If we wait for the infrastructure, nothing will get done." NO! If we wait for proper and safe infrastructure it will get done but it will be done right and future generations will contemplate the wisdom of their fore bearers and their care for their children rather than the stupidity of hasty decisions damaging their environment and their health. Can we wait till we have answered the proper questions. Please respond by email. The meeting clearly was not set up to provide answers.

Sincerely,

Robert B. McGinley
Susan L. Schiavone

Additional Comment:

I am sending this addendum note to our letter as a question from the meeting on August 22. No one mentioned the actual parts per billion or whatever concentration of DDT and dieldrin that would be left in the remaining water after removing 99.7%. Can you provide this information please. Also I am concerned how this amount would begin to accumulate in the aquifer? Even tiny amounts can accumulate and build up. Has that been studied? Once in, it is never out. Thank you. Susan Schiavone and Robert McGinley

Comment from: Rick Riedl

I attended the presentation on the subject project on August 22, 2016. The presentation was made in accordance with the State Water Resources Control Board Division of Drinking Water requirements for a public hearing to solicit input from the public. I am submitting the following comments and questions in accordance with this requirement.

1) The City of Seaside should be considered a stakeholder in developing any plans that may affect the use or alteration of lands within city limits and/or water from the Seaside Basin Aquifer.

2) The presentation stated that all of the water injected into the Seaside Basin would be extracted by Cal Am. Considering there are several users that have wells that produce water from this basin, how will this be ensured?

3) Is it necessary for the City of Seaside to enter into a water purchase agreement with MRWPCA and MPWMD? If not, could the City of Seaside purchase water from this project?

H-18 4) Has it been demonstrated that there is not an aquitard or aquiclude between the vadose zone and the Santa Margarita aquifer within the area being consider for the injection wells? If not, how would
H-19 production wells installed in the Santa Margarita formation, including the Cal Am well(s), benefit from
H-20 water injected into the vadose zone? What is the estimated transient time for water injected at the
vadose wells to the Santa Margarita aquifer?

5) Would the water injected into the aquifer be regulated by the surface water treatment rule? If so, would all entities using the Seaside Basin be subject to this rule including reporting requirements? If so, please describe potential additional monitoring, treatment, analytical, and/or reporting requirements. Also, who would be responsible for any associated costs?

H-21 6) It was reported that a possible response action to an upset in the GWR process was to shut down the production wells. The City of Seaside has a production well in the Seaside Basin that serves many consumers. How will these consumers be supplied water if the GWR project forces a shut-down of the City of Seaside's sole source of water?

Thank you

Rick Riedl
City Engineer
City of Seaside
phone (831) 899-6884



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: Steve Shimick

Affiliation: The Other Project / Monterey Coastkeepers

Email: exec@otherproject.org

Mailing Address: P.O. Box 269 Monterey, CA
93946

Phone Number: 831-663-9460

Comments: Project is slightly less
than OK. Could be great.
All product water - DWR +
ESIP, must go through
denitrification.

I-22

Letter J



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: Bill Carrothers

Affiliation: Every Breath You Take....

Email: cih5102@earthlink.net

Mailing Address: 42 Stone Street, Unit 4
Salinas

Phone Number: _____

Comments: Some ideas for legal reforms
of California water law.



Letter K

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Pure Water Monterey
A Groundwater Replenishment Project

Name: John Tilley
Affiliation: Monterey Commercial Property Owner
Email: John.Tilley@pinnaclebank ASSOC.
online.com

Mailing Address: 1276 A S. Main Street Salinas CA 93940

Phone Number: 831-287-2711

Comments: The MRLWPCA is to be
commended for this project which
is part of a portfolio of long term
solution to the water needs of the
region and importantly the
health of the Carmel River
biosphere. I urge the
DDW to do all they can to
see this project to a swift
and successful conclusion to
this project.

Continued on back

Letter L



Pure Water Monterey
A Groundwater Replenishment Project

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Name: Barbara Meister
Affiliation: Monterey Bay Aquarium
Email: bmeister@mbaqaq.org
Mailing Address: 886 Conner Row
Monterey CA 93940
Phone Number: 831-0648-4978

Comments: _____

As a conservation research education
and advocacy organization, the Monterey
Bay Aquarium supports the Pure Water
Monterey water recycling and purification
project. We support the ^{decision} principles
of recovering wastewater,
produce waste water, irrigation
and storm water runoff. While
Pure Water Monterey will not meet the
Peninsula's entire water demand, it
will make an important contribution
to a sustainable water supply portfolio.

Letter L

Continued on back



Letter M

Pure Water Monterey
Groundwater Replenishment Project
Public Meeting Comment Card
August 22, 2016

Pure Water Monterey
A Groundwater Replenishment Project

Name: Jeanne Byrne

Affiliation: Chair - Monterey Peninsula Water

Email: jcbarchtaia@att.net Management

Mailing Address: 591 Lighthouse Ave. #5
Pacific Grove, CA 93950

Phone Number: 831 372-6585

Comments: Attached

My name is Jeanne Byrne

I am the current Chair of the Monterey Peninsula Water Management Dist.
and a longtime resident of the Peninsula

The Pure Water Monterey project that is before you is supported by a broad base of community agencies and organization. It is a critical component of meeting the Cease and Desist Order imposed by the State Water Resources Board.

unopposed
The Engineering Report and EIR that are before you are some of the most thorough and comprehensive environmental documents I have seen as an elected official and they reflect the success of such projects in other areas.

acceptance
We need your support and approval today to move the Pure Water Monterey forward to meet the critical deadlines that are before us.

Comment from Ron Weitzman

Yohana, last Monday Paul Sciuto asked me to send him the document pasted below. It is from Steve Collins and refers to the Regional Desalination Project, which originally included a Pure Water component. The document pasted below is sworn testimony from a Cal Sam attorney on the proposed Pure Water component of the regional project leading to the decision to scrap that component from the project. I have asked Steve if he possesses any other documents that led to that decision,. In response, he sent me the attached documents. I believe it will be useful for your project proponents to consider these documents seriously, particularly with this this question in mind: What has changed since 2010 to render these documents no longer relevant? --Ron Weitzman, for Water Plus (Water Ratepayers Association of the Monterey Peninsula)

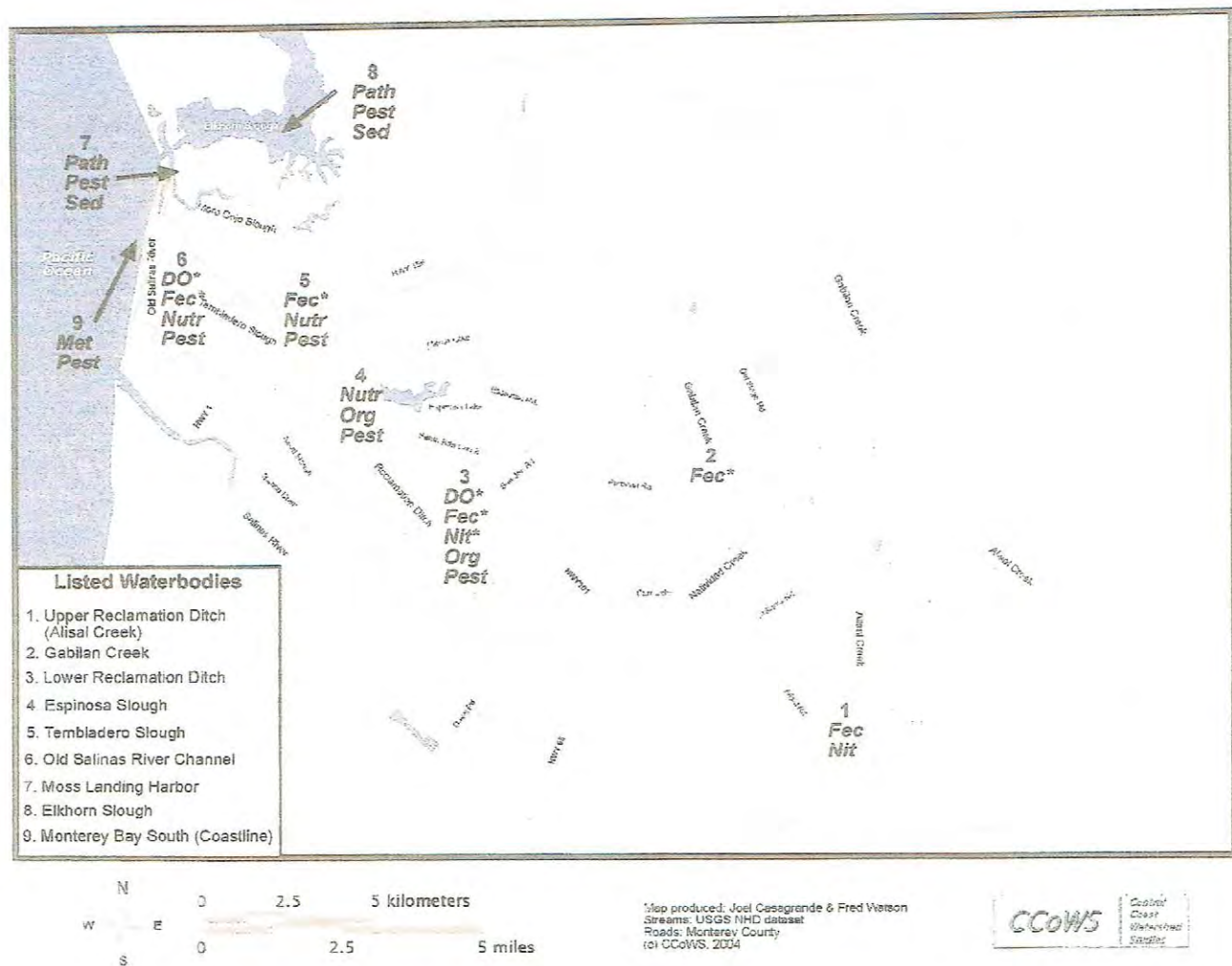


Figure 6.6 Section 303(d) listings for various water bodies within and adjacent to the Reclamation Ditch Watershed.

DO = Low dissolved oxygen
 Fec = Fecal Coliform
 Nit = Nitrate
 Nutr = Nutrients
 Org = Priority Organics
 Pest = Pesticides
 Sed = Sedimentation/Siltation
 Met = Metals

* Listings added in 2002 (approved by EPA, 2003). All others were included in the 1998 listing.

- 1) It has greater environmental impact in comparison to the CWP and its North Marina project alternative, due to its proposed construction of a 14 Million Gallon/Day (mgd) Salinas River surface water treatment plant and related facilities. As noted in testimony below, the DEIR overstates potential significant impacts of the CWP and North Marina Alternative desalination plants, and understates potential impacts of the Phase I Regional Project. California American Water notes that the DEIR fails to provide an adequate comparison between the Phase I Regional Project and the proposed Project (at MLPP); the DEIR "analysis" is limited to one sentence on DEIR page 7-60.
- 2) The DEIR understated the potential impacts related to Salinas River diversions. California American Water believes that the DEIR-described treatment processes for the Salinas River would not remove pesticides and nitrates; therefore it is not shown that the water would be treated to potable standards, and the resulting potential impacts to the Santa Margarita aquifer in the Seaside Basin are not described. California American Water believes that additional "advanced treatment" processes, which are also not described in this DEIR, may be required to remove pesticides and nitrates and other contaminants of concern from the Salinas River sources in order to allow the project water to comply with the SWRCB Anti-Degradation Policy and the Central Coast Regional Water Quality Control Board's Basin Plan for the Seaside Basin. These additional facilities would expand the Phase I Regional project alternative's "footprint" as well as increase construction and operational costs. Finally, the DEIR does not acknowledge the potential public health risk perception of using contaminated Salinas River stream flow for potable water. This issue, at minimum, should have been identified on page ES-15 of the DEIR under "Areas of Controversy". The DEIR does not describe the significance, nor potential political, legal and regulatory complexities associated with diverting and storing Salinas River surface water in the Salinas Groundwater Basin. The DEIR substantially understates the Endangered Species Act implications of this proposed diversion, merely referencing it as "consultation" when in fact the surface diversion would require extensive formal Endangered Species Act Section 7 consultation, a formal Biological Assessment (yet to be prepared), a formal Biological Opinion (yet to be initiated), and incidental take authorization from the U.S. Fish and Wildlife Service and/or NOAA Fisheries.
- 3) The DEIR understated and miscalculated potential physical impacts of the Phase I Regional alternative related to Salinas Basin Groundwater extractions. The DEIR statement in the project description implies that an average 3,400 AFY of desalinated water will be returned to the Salinas Valley Groundwater Basin (SVGB) (via the 80-acre Monterey Regional Water Pollution Control Agency's C-SIP storage pond) and/or to the Marina Coast Water District (MCWD). However, the 10 mgd desalination plant in the Regional project alternative would only be capable of producing a maximum of 11,200 AFY of production; and if 3,400 AFY were to be delivered to MCWD/SVGB, only 7,800 AFY would remain for delivery to California American Water. As noted in Chapters 2 and 3 of the DEIR, where California American Water's replacement water supply requirement of

The TMDL progress report (http://www.swrcb.ca.gov/centralcoast/water_issues/programs/tmdl/docs/salinas/nutrients/sal_nut_dataanalyrpt_061410.pdf) did not address 'critical' environmental factors associated with nutrient loading in the Lower Salinas River Watershed, in which a slight increase in nutrients could lead to exceedance of water quality objectives. However, the progress report does specify some indicators that can impair the beneficial uses of the regional water bodies.

Data analysis for the June 2010 California Regional Water Board Progress Report included:

- A delineation of watershed boundaries
- A list of subwatersheds
- Stream classification, which revealed in general low gradient streams on the valley floor were perennial, and many headwater streams tended to be ephemeral.
- An assessment of groundwater as baseflow. For the TMDL project area baseflow index values for groundwater ranged from 38 to 26 percent.
- An assessment of mean groundwater nitrate concentrations for the project area. Values reported ranged from 0.1-10.0 mg/l to 100.1-200.0 mg/l of nitrate.
- An assessment of mean annual precipitation for the project area. For the project area values ranged between 11.1 inches to 33.5 inches on average annually.
- An analysis of land use and land cover. In the project area, land uses include approximately 34% farmland, 31% grazing land, 8% urban, and 26% undeveloped/forested/restricted.

2012 TMDL Report

The 2012 CCRWQCB project report draft of TMDL for nutrients in the Lower Salinas River Watershed (LSRW) (Monterey County, CA)^[1] is titled: *Total Maximum Daily Loads for Nitrogen Compounds and Orthophosphate for the Lower Salinas River and Reclamation Canal Basin, and the Moro Cojo Slough Subwatershed, Monterey County, California* AND WAS COMPLETED/FILLED DATE. Nutrients are defined as biologically-accessible nitrogen compounds and orthophosphate loading into waterways of the LSRW.

This draft report indicates a proposed geographic scope of around 405 acres in the Lower Salinas Valley of northern Monterey County, focused on the two major drainages, the Reclamation Canal Drainage and the Lower Salinas River Drainage (pictured at right). The Moro Cojo subwatershed is identified as a subwatershed in the report.

The ultimate receiving body (drainage) of both waterways and tributaries is the Monterey Bay and the Monterey Bay National Marine Sanctuary. Pollutants addressed by the proposed 2012 TMDL draft are nitrate, un-ionized ammonia, and orthophosphate. Reductions in pollutants are expected to target 303(d)-listed impairments from low dissolved oxygen (DO) and chlorophyll-*a* within the project area. These impairments relate to the biostimulatory effects of nitrate and orthophosphate on freshwater systems.

According to the draft TMDL report (2012):

"Discharges of nitrogen compounds and orthophosphate are occurring at levels in surface waters which are impairing a wide spectrum of beneficial uses and, therefore, constitute a serious water quality problem. The municipal and domestic drinking water supply (MUN, GWR) beneficial uses and the range of aquatic habitat beneficial uses are currently impaired; potential or future beneficial uses of the agricultural irrigation water supply (AGR) for sensitive crops may be impaired. A total of 34 waterbody/pollutant combinations are impaired due to exceedances of water quality objectives. The pollutants addressed in this TMDL are nitrate, un-ionized ammonia, and orthophosphate. Orthophosphate is included as a pollutant due to biostimulatory impairments of surface waters. Reducing these pollutants is also anticipated to address several 303(d)-listed dissolved oxygen and chlorophyll *a* impairments in the TMDL project area. As a result of these conditions, beneficial uses are not being protected." and

"By developing TMDLs for the aforementioned pollutants, the water quality standards violations being addressed in this TMDL include:

- Violations of drinking water standard for nitrate
- Violations of the Basin Plan general toxicity objective for inland surface waters and estuaries (violations of un-ionized ammonia objective)
- Violations of the Basin Plan narrative general objective for biostimulatory substances in inland surface waters and estuaries (as expressed by excessive nutrients, chlorophyll *a*, algal biomass, and low dissolved oxygen)"

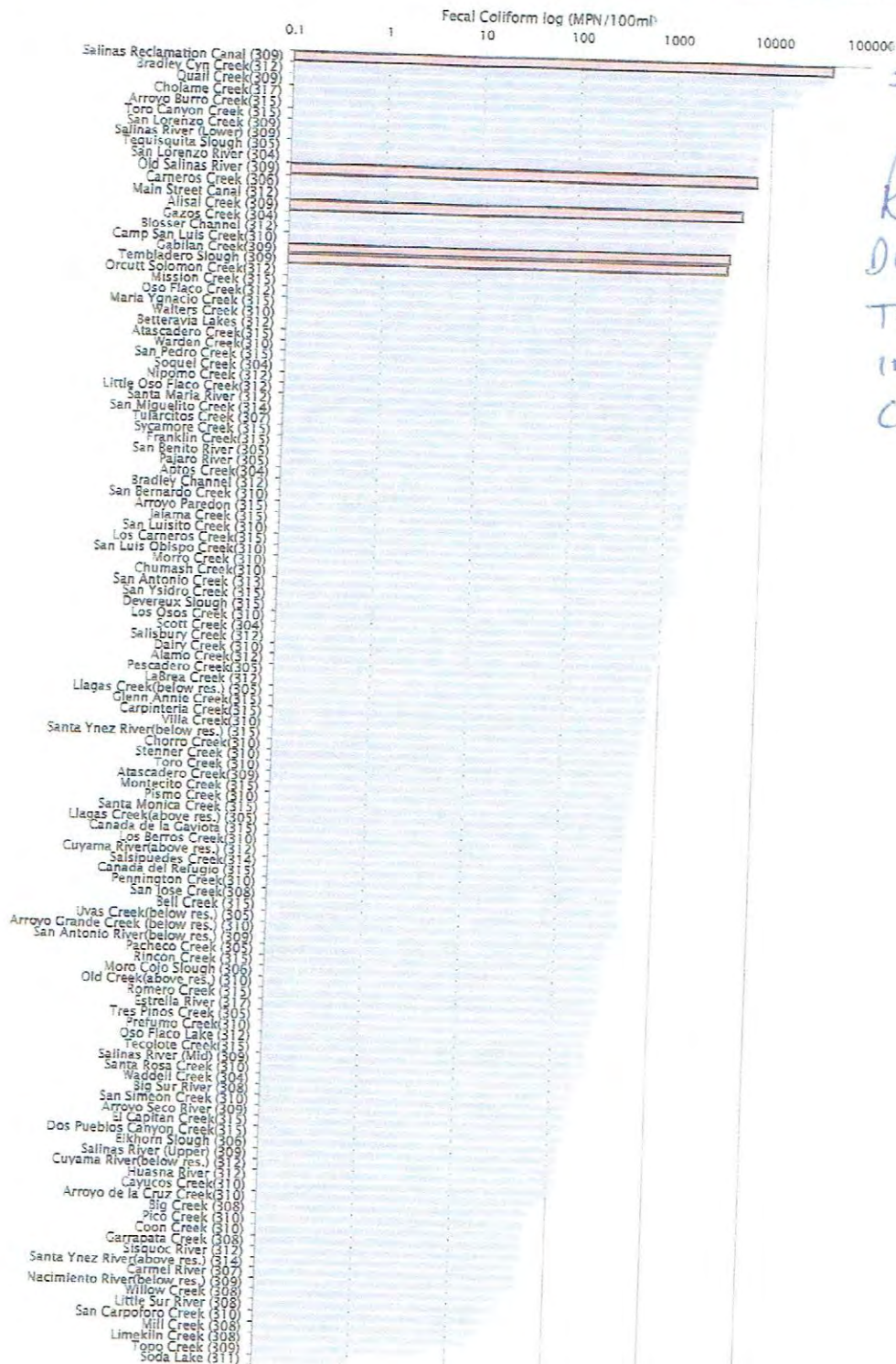
According to the CCRWQCB draft TMDL nutrient report (2012):

"There does not appear to be a significant geologic reservoir in the project area that could contribute to elevated nitrogen loads to surface waters."

Eutrophication of waterways may occur when excess nutrients are present and environmental conditions promote algal growth. Biologically-accessible nitrogen and phosphorus are *limiting nutrients* in many ecosystems (CITE). In general, sources of nutrients in watersheds include: urban runoff, fertilizers, groundwater, livestock, wastewater treatment plants, and septic systems. Specifically for the Lower Salinas River Watershed (Anderson et al. 2003)^[3] identified irrigated agriculture as the dominant source of nutrients in watersheds in the region.

According to the SWRCB-contracted UC Davis report^[4] (Harter and Lund 2012) on nitrate in California's Drinking Water for the State Water Resources Control Board (SWRCB), nitrates are reducing quality of drinking water from shallow wells. The report concludes that: "Most nitrate in drinking water wells today was applied to the surface decades ago."

The report is part of a contracted study for the SWRCB as part of the Senate-mandated *Groundwater Nitrate Project* as part of biannual reporting on initial studies into nitrate effects on drinking water in the Tulare Basin and Salinas Valley. The report also cites agriculture as the estimated source of 96% of nitrate loading to groundwater--200 Gg/yr (1 Gg = 1100 tons) within these regions, with the next largest (estimated) source (wastewater treatment and food processing wastes) loading 3.2 Gg nitrate/yr to groundwater.



#1
RECLAMATION
DITCH IS MOST
TOXIC WATER
IN CENTRAL
COAST REGION

Figure 6.5 Mean fecal coliform at all CCAMP measured waterbodies throughout the Central Coast Region 3. Waterbodies in the Reclamation Ditch Watershed are shown in dark red (Units: log scale MPN/100 ml).

from Nacimiento Reservoir beginning the eighth day after the first adult steelhead passage day³ occurs on the Salinas River near Spreckels after January 1st. These flows will be continued through May 31st. Until further studies are conducted to determine adequate rearing flows in the Nacimiento River below the reservoir during summer and fall, MCWRA will release a minimum of 60 cfs throughout the year as minimum rearing flow as long as the water surface elevation of Nacimiento Reservoir is above the elevation 687.8 feet mean sea level (msl), the reservoir's minimum pool.

d. Water Quality Improvements and Other Changes to the Blanco Drain

The SRDF diversion site is located in the vicinity of the Blanco Drain, which discharges to the Salinas River upstream of the SRDF site. Because water from Blanco Drain is considered unsuitable for irrigation, MCWRA proposes to divert the drain's discharge to a point downstream of the SRDF site whenever the SRDF facility is impounding water for irrigation use.

The Blanco Drain drainage area consists of approximately 6,400 acres of farmland, scattered rural housing, and county roads. Summertime drainage is primarily agricultural drain water. Wintertime drainage is primarily storm runoff. MCWRA operates a pump during the summer to discharge the drain water to the Salinas River.

The Central Coast Regional Water Quality Control Board (CCRWQCB) has listed Blanco Drain as an impaired water body pursuant to Section 303(d) of the CWA for pesticides, with medium priority. To reduce contaminant loads of diazinon and chlorpyrifos from reaching the Salinas River, MCWRA proposes to create a vegetated treatment system within Blanco Drain. A vegetated treatment system generally consists of vegetation throughout a reach of channel bottom designed to reduce water velocity and retain pollutants by various processes, such as microbial degradation, plant uptake, sorption, chemical reactions, and sediment retention. The specific design for the Blanco Drain vegetative treatment has not been completed, and the specific location for the vegetated channel sections has not been identified. MCWRA will monitor the vegetated treatment system to determine the efficacy of contaminant reduction.

In the event that the vegetated treatment system is inadequate to sufficiently reduce diazinon and chlorpyrifos loads within the Blanco Drain, then MCWRA will pursue other options (see page 26 of MCWRA (2005a)). Options include, though are not limited to, diverting the water to the regional wastewater treatment plant for recycling, and diverting Blanco Drain water to Alisal Slough. A specific definition of "inadequate to sufficiently reduce diazinon and chlorpyrifos loads" has not been provided to NMFS.

e. SRDF Maintenance

Maintenance of the SRDF will primarily consist of, but will not necessarily be limited to, periodic removal of deposited sediment, periodic removal of debris, annual scour restoration, annual pressure washing of fish screens, periodic maintenance and lubrication of equipment, and

³ The first day of passage is the beginning date of the first period with five consecutive days with flows of 260 cfs or higher at Chualar. The first potential spawning day in the Nacimiento River is assumed to be 8 days after the first passage day.

FROM NOAA FISHERIES "BIOLOGICAL OPINION"
DATED JUNE 21, 2007 Admin No. 151422SWR2003SR8711

(1)

with the most recent CDPH regulations for recycled water recharge but the CDPH Groundwater Recharge Regulations continue to be in draft form, necessitating each groundwater recharge project to be considered on a case by case basis. Using industrial water or agricultural runoff as dilution water, as proposed in the GWR Project, may not be acceptable to the CDPH.

- Environmental Health and Safety: Environmental health and safety issues associated with dual-use facilities would need to be studied in detail. The health and safety issues mostly relate to conveying advanced treated wastewater through a pipeline, which would also be used for conveying non-potable water (i.e., recycled water for irrigation). The health and safety issues related to injecting advanced treated recycled water into the Seaside Basin would need to be studied further; both the SWRCB Recycled Water Policy and the draft CDPH Groundwater Regulations require extensive groundwater modeling, recycled water and groundwater monitoring, and dye tracer studies before approval of a project.
- Reliability: The draft CDPH requirements for Groundwater Recharge Reuse Projects (such as the GWR Project) require that the recycled water used for groundwater recharge be diluted with CDPH-approved drinking water source. The availability of the diluent water and the recycled water (which would be available only during winter months) needs to be studied further. The reliability of water available for the GWR Project, particularly in summer months and dry years, has yet to be determined.

As noted in some of the comments, the GWR Project would provide benefits to water supply and groundwater resources, which is one of the reasons the project is included in the EIR. In summary, since the factors mentioned above have yet to be further explored or studied, the EIR discusses the GWR Project at a program level and hence is listed under Phase 2. The EIR utilizes information in the RUWAP EIR for the pipeline, which will be used for urban irrigation and may also be available for the GWR Project. However, the GWR is not ripe for development. A separate project-level CEQA document will need to be prepared when additional details on the factors discussed above are made available.

RRWPCA CAN NOT CLEAN THE WATER
WELL ENOUGH TO IRRIGATE AN ARTICHOKE,
NOW THEY WANT TO TRY TO TURN IT INTO
DRINKING WATER FOR THE PENINSULA?

EIR APPROVED BY
AJC ON 12/17/09

Breakdown of DDT

- o DDT slowly breaks down in the Drain sediments; by the time it reaches the Salinas River, it has broken down to about 20 percent Technical DDT, 35 percent DDD, and the remainder DDE. The major breakdown products, DDD and DDE are as undesirable in the environment as the parent compound.
- o The persistence of DDT in the soils could not be determined by this study, but it is probably very persistent. Earlier studies conducted in the Salinas/Elkhorn Slough area reported lesser amounts of Total DDT in soils than found in this study. Further study is needed to determine how persistent DDT is in Salinas soils.
- o Salinas area agricultural soils contain a "reservoir" of DDT, which is being released to the aquatic environment (drains, canals, rivers, bays, etc.) through soil erosion due to agricultural practices and rainfall runoff events. Considering the mixing of DDT into the soil column and normal soil erosion rates, it is probable that this release of DDT into the Salinas River will continue well into the 21st Century.

Possible Transport Mechanisms

- o Fields on the east end of the Drain are literally plowed over the edge and into the Drain. Sediments in the east end of the Drain contain the unmistakable fingerprint of soil-based DDD and Technical DDT. In the lower portions of the Drain, where berms exist, DDD and DDT ratios are more characteristic of sediment. Staff are convinced that the observed practice of plowing over the edge of the Drain is a major source of DDT to the Drain. Other erosion events may also contribute to the DDT found in the Drain.
- o Corbicula (clams) planted by State Mussel Watch in the Blanco Drain contained the highest concentrations of Total DDT (and other chemicals) ever seen in California: 3,800 ppb (3.8 ppm, wet weight). This indicates that much of the transport of DDT is via very fine suspended materials through and out of the Drain.

DDT on Food Crops

- o DFA regularly tests vegetables in the Salinas area and has reported finding no (or extremely little) DDT in unwashed vegetables. This has generally been true ever since the use of DDT was discontinued in 1972. This strongly indicates that there has been no continued use of DDT in the Salinas area for agricultural purposes.

Corrective Measures

- o Positive steps taken to reduce or eliminate soil erosion could result in major reductions in the amounts of DDT input to the aquatic environment, with increased water quality/aquatic life benefits. If these steps are

Comment from Tom Rowley

To: Yohana Vargas, Contracts Administrator at MRWPCA, 5 Harris Court - Bldg D, Monterey, CA 93940

1. The purpose of this letter is to document previous concerns raised by Monterey Peninsula Taxpayers Association (MPTA), re: the limits and relatively high-cost of the Groundwater Replenishment / Pure Water Monterey (GWR / PWM) Project as presented during various public forums by the MRWPCA and the MPWMD during the past several years, and most recently at the Public Hearing held in conjunction with the State Water Resources Control Board (SWRCB) Division of Drinking Water on Monday Afternoon August 22, 2016 at the MRWPCA Board Room at Ryan Ranch here in Monterey, CA.
2. Earlier this year, during the public meeting here in Monterey sponsored by the MPRWA (Mtry Peninsula Region Water Authority) with Representatives from the staff of the California Public Utilities Commission (CPUC) at Monterey City Hall the discussions focused on the delays caused by the CPUC in developing an updated EIR / EIS for Cal-Am Water's application for the three-pronged project portfolio called the MPWSP (Monterey Peninsula Water Supply Project). MPTA comments at that meeting to the distinguished panelists from the CPUC staff: The Monterey Peninsula (MP) is "NOT ORANGE COUNTY -- We are a Peninsula with only approx 40,000 water customers (residential and business) supplied by California American Water (CAW), our local water provider. With the current cost of a desal project estimated at over \$300 Million to provide approximately 6,000 AFY, the additional cost of a GWR / PWM project will provide a maximum of only 3,500 AFY -- and is thus a smaller, but valuable "Back-Up" project. However, the original cost of \$80 Million has now been increased \$50 Million to cover the cost of the so-called "Monterey Pipeline" (with an associated pump station along Hilby Avenue in Seaside). That raises the total initial price tag of the GWR / PWR to at least \$130 Million.
3. Comments from MRWPCA staff that a grant is expected from the State for \$15 Million for this "Back-Up" Project to the larger Desal project -- and the third project (ASR) in the portfolio -- are not at all comforting or reassuring for Monterey Peninsula CAW rate-payers / taxpayers. Previously -- MPTA has raised concerns about the actual cost of recovering the recycled water from the Seaside Basin and then treating it to potable standards -- And the bureaucratic reply from MPWMD officials is that the cost of recovery and treatment of the 3,500 AFY will be included in annual O&M costs... If the "social and environmental" benefits of the GWR / PWM project are so great, MPTA urges that additional State grants or funding should be forthcoming to pay for the project. Even low interest SRF loans at 1 % are not convincing when considering the total burden resulting from the over-loaded total financial costs for the three-pronged MPWSP. BTW -- Rainfall statistics in the past have shown that 7 out of 10 years on the MP are relatively dry years (less than 18 to 20 inches per Water Year), and to rely on "excess flows" in the Carmel River to provide source water on an annual basis for ASR is downright foolhardy!

(Suggestion: Please examine closely the actual ASR production / injection into the Seaside Basin in AFY since the project came on line several years ago.)

4. Additional comments and to partially summarize: GWR is a really a very expensive project for only 3,500 AF of recycled water injected into the Seaside Basin each year. When you add the estimated \$50 Million cost of the so-called "Mtry" Pipeline (from Seaside thru Mtry to PG) + the add'l Pump Station at Hilby Ave (near Yosemite St in SS) to the \$80 Million for the GWR / PWR plant and pipelines, etc from the Seaside Basin = approx \$130 Million: The obvious conclusion is that it is a relatively expensive project. Granted that the pipeline and pump station are also needed to fully use ASR water injected into the SS Basin (that water is now generally of use only to supply water customers in SS)! The pipeline and pump station were considered part of the CAW desal project (Phase 1 of the MPWSP), but the time table for that infrastructure has been accelerated to sooner rather than later because of delays in the desal environmental impact report (now not due out in draft until Dec 2016). Also, the cost of pumping the recycled GWR water from the Seaside Basin is planned to be charged off to annual O&M costs... Avoidance of the true costs of GWR is how the proponents at MPWMD and MRWPCA can claim the cost is only approx \$1700 per AF.

5. MPTA suggests a strong lobbying campaign by officials at the MRWPCA and MPWMD, with support from the Mayors at the MPRWA, to intensify lobbying efforts in Sacramento to obtain additional funding support (aka grants) for GWR / PWM. State water officials need to be convinced to support GWR financially because it is recognized as a great project for the environment and also to advance "social" goals & policies / purposes. So why not request the State water bureacracy to fund ALL of the GWR project -- Now really costing at least \$130 Million (\$80 Million + \$50 Million)!

6. As part of the three-pronged portfolio of Cal-Am's MPWSP -- the GWR/ PWM is truly a nice but limited "Back'Up" project to the larger desal project, and even a nice back-up to the currently planned smaller 6,000 AFY CAW slant-well desal project. But GWR is still not really cost effective in comparison to a larger 9,000 AFY desal project, which we know is really needed to meet long-term MP water supply needs!

Submitted By: Tom Rowley, Vice-President of MPTA / PO Box 15, Monterey, CA 93942
/ Home TEL: (831) 373-5204