



MARINA COAST WATER DISTRICT

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~~May-June~~ 2715, 2015

Ms. Teri Wissler Adam, Contract Project Manager
City of Seaside
440 Harcourt Avenue
Seaside, CA 93955

RE: Monterey Downs and Monterey Horse Park and Central Coast Veterans Cemetery Specific Plan:
Comments on Subsequent Environmental Impact Report

Dear Ms. Adam:

Marina Coast Water District (MCWD) appreciates the opportunity to submit the following comments on the above referenced Environmental Impact Report, which were reviewed by the Board of Directors. Comments are grouped by general topic: Water, Wastewater, Infrastructure Improvements, and Required Approvals. MCWD staff is available to meet with you, City staff and the project applicant to discuss these comments.

Water Demand and Supply

- Project Water Demand.** The proposed project as described in Section 2 of the Draft EIR (DEIR) is not substantively different than the description used in MCWD's 2012 "Water Supply Assessment and Written Verification of Supply (WSA) for the Monterey Downs Specific Plan". Therefore, we see no need to revise or update the water demand estimate of 852.5 acre-feet/year (AFY).
 - Table 4.19-12 and the related text refer to the "Monterey Downs Water Supply Assessment Supplement" prepared by the Developer's engineer, Diamond West. This report assumes lower per unit water demand rates than the District's WSA. We do not object to including it the EIR for comparison, but the City should use the more conservative water demand estimate from the MCWD WSA when allocating water supply to the project.
- Project Water Demand Exceeds Groundwater Allocations.** The DEIR correctly reports the WSA conclusion that the project water demand exceeds current available supplies and also exceeds the remaining groundwater allocation to Seaside and Monterey County. (The project water demand also exceeds the amount factored into the District's Urban Water Management Plan for the project area by approximately 114 AFY.) The DEIR reports that current supplies could meet project demand for Phases I through Phase III with existing unused allocations. However, the WSA identifies a total combined remaining allocation of 383.2 AFY for the city of Seaside and unincorporated Monterey County, but the DEIR indicates that 412.9 AFY is available. This revised total reflects the updated summary of water allocations provided in November 2012, but this should be explained in the FEIR.
 - Under a land purchase agreement between the City of Seaside and the District, MCWD is providing 2,500 acre-feet of water to Bayonet/Blackhorse Golf Courses in Seaside under a

contract is expected to be completed this year (in summer 2015). Because this use was considered temporary by both parties, the City did not make a formal allocation of water supply to the golf course. If the City desires to continue this water service beyond the term of the original agreement, the District would expect the City to make a formal allocation of water supply to the golf course, which would affect the amount of unallocated supply available for the proposed project.

3. **Water Supplies.** As indicated in the WSA, the District can supply water to the initial phases of the project, up to the amount sub-allocated by the City and/or County. The WSA indicates that the District has two planned water supply projects it intends to implement in the next decade: the Recycled Water Project and the Desalination Project, which would provide 2,700 AFY of new supply for the Ord Community. MCWD is working with the local agencies and with the Fort Ord Reuse Authority to develop additional water supplies. At the time additional supplies become available, FORA will allocate the supply to the jurisdictions in the Ord Community service areas, which could provide water for additional phases of the project.

- The DEIR is correct in reporting the uncertainty of when additional supplies will be available (page 4.19-33) and recent MCWD actions to pursue a desalination facility. However, the timing of the recycling project is not known. MCWD is currently negotiating with the MCWPCA regarding the details of an agreement to deliver reclaim water to the Ord campus but those negotiations are still ongoing. The DEIR (page 4.19-22) incorrectly indicates that the recycled water augmentation is expected to be online by 2016.
- [The DEIR \(page 4.19-8\) reports that the MCWD Board of Directors, on January 21, 2015, authorized securing firms to conduct environmental review, prepare a financing plan, and designing/building a 2700 acre foot desalination facility. What is not reported is that on March 2, 2015, the Board of Directors revised that plan calling for the solicitation of proposals to complete a 10% design of a 2700 acre foot desalination facility and solicitation of proposals to begin environmental analysis and participation in the conceptual design.](#)
- The DEIR (page 4.8-9) correctly indicates the projected water demands for MCWD to the year 2030 as identified in the District's *2010 Urban Water Management Plan (UWMP)* and indicates that MCWD has sufficient well capacity to meet maximum day demands. The EIR text should clarify that current groundwater allocations are sufficient to meet MCWD demand only within Central Marina, but not for the Ord Community demand as indicated on pages 18 and 43, respectively, of the 2010 UWMP.
- The paragraph at the bottom of page 4.19-22 misquotes the Water Supply Assessment report with respect to recycled water for Bayonet/Blackhorse Golf Courses. The Fort Ord Reuse Authority has formally allocated recycled water supply from the Regional Urban Water Augmentation Project. The City of Seaside has not formally allocated 430 AFY of recycled water to the Golf Courses, as stated in the DEIR. Instead, the City has previously committed to supply recycled water to the golf courses when it becomes available, and that annual demand was estimated to be 430 AFY based on the actual irrigation use in 2011.

4. **Water Mitigation Measures and Alternatives.**

- *Mitigation Measure W-1, [Water Service Agreement](#), requires proof of adequate water supply prior to approval of any discretionary approvals. Given the uncertainty regarding the development and funding of new potable and non-potable water sources, it should be determined whether the Specific Plan and changes to the General Plan and zoning districts*

for those areas should be approved at this time without an existing water supply that is capable of serving the entire project. Further, the City of Seaside must first allocate available water to the project before MCWD can provide service. Mitigation Measure W-1 should require provision of proof of adequate remaining allocation approved by Seaside to serve the discretionary approvals of project phase(s) being considered by the City.

- *Mitigation Measures W-2 and W-4, Obtain MCWD Water Permits and Recycled Water Improvement Plans and Permits*, should refer to MCWD's Procedures, Guidelines and Design Requirements (PGDR), which explains the permitting process for new developments. This process includes the Developer's required master planning for on-site wastewater collection infrastructure, coordination with the District for required off-site infrastructure, standards for on- and off-site infrastructure design and construction, required agreements between the Developer and the District, and the basis for calculating capacity charges for connection to the MCWD System.
- *Alternatives*. Given the significance of the impact, the DEIR should consider an alternative that modifies and/or reduces the project land uses/phasing so that project water demand can be served by available supplies. Quantifying water demand for each alternative discussed would allow a more informed comparison between alternatives with regards to impacts on water supplies.

Wastewater Collection Service

5. **Wastewater Collection Service Provider**. The DEIR indicates either MCWD or Seaside County Sanitation District (SCSD) would provide wastewater collection service. The wastewater collection server is not identified in Wastewater section (4.18), but page 2-64 of the DEIR indicates annexation of the project property to the Seaside County Sanitation District. Project maps show connection to MCWD sewer lines and Specific Plan Chapter 8 (page 8-19) identifies MCWD as responsible for construction of water and sewer lines.
 - The opening sentences of Section 4.18.1 contain several errors. The correct wording should be: "Wastewater collection and conveyance on the former Fort Ord is currently provided by the Marina Coast Water District (MCWD) under contract to FORA. MCWD is a county water district that serves approximately 30,000 persons within the City of Marina and the Ord Community. MCWD's sanitary sewer collection system in the Ord Community consists of approximately 70 miles of gravity pipelines, 6 miles of pressure pipelines, 1,200 manholes and 16 lift stations."
 - The reference to MCWD treatment facilities in sewer line discussion on DEIR page 4.18-9 appears to be an error as the District does not provide wastewater treatment services, but rather, relies on the MRWPCA for treatment of wastewater delivered from Central Marina and Ord by MCWD.

Water and Sewer Line Infrastructure Improvements

6. **Water System Improvements**. The proposed project will trigger off-site water system improvements per the District's Water System Master Plan. The City and the Developer(s) must coordinate with the District on the project timing so these projects may be completed.
 - On page 4.19-28, the last paragraph discusses including a recycled water storage reservoir as part of the REC-2 planning area. This reservoir was not considered in the District's planning

- for the development of an urban recycled water delivery system, nor was it considered in the project's Water Supply Assessment. The operational and permitting considerations of seasonally storing recycled water in an open reservoir where regrowth may occur are not discussed in the technical appendices. Therefore, we recommend that this paragraph be reworded to present the location as a potential reservoir site for a future urban recycled water system.
- Figure 2-21, *Proposed Backbone Recycled Water Improvements*, shows a long recycled water main in Eastside Parkway/Eucalyptus Road to the District's proposed recycled water tank. The District's proposed urban recycled water trunk main will be in General Jim Moore Blvd. It appears that a shorter pipeline route for the project would be down Normandy Road from the project site to General Jim Moore Blvd. It is likely that the proposed project would necessitate sanitary sewer improvements in this road as well, so the construction could occur concurrently.
7. **Sewer Infrastructure Improvements.** The proposed project may require off-site sewer infrastructure improvements within the Ord Community as indicated in EIR Section 4.18.5. The District's 2005 *Ord Community Wastewater System Master Plan* did not consider redevelopment occurring within the project area, so we cannot provide an itemized list of off-site requirements. We can anticipate the required improvements will consist of one or more gravity pipeline additions or replacements with larger pipes, occurring in existing street rights-of-way. We do not anticipate the need for any additional lift stations, other than the in-tract facilities identified in the Draft EIR.
- Mitigation Measure WW-1, *Obtain Wastewater Improvement Plans and Permits*, may refer to MCWD's Procedures, Guidelines and Design Requirements (PGDR), which explains the permitting process for new developments. This process includes the Developer's required master planning for on-site wastewater collection infrastructure, coordination with the District for required off-site infrastructure, standards for on- and off-site infrastructure design and construction, required agreements between the Developer and the District, and the basis for calculating capacity charges for connection to the MCWD System.
8. **Impacts of Installation of Infrastructure.** The DEIR analyses do not summarize significant impacts that could occur with installation of new water and potential sewer lines and related infrastructure, but broadly states impacts are evaluated elsewhere in the document (Impacts 4.18-1, 4.19-2, 4.19-3). The impacts and levels of significance should be clearly stated and cross-referenced to other EIR sections in the event that the MCWD installs some of the infrastructure, and thus, may rely on the EIR analyses for its CEQA review.

Approvals Required Prior to MCWD Provision of Service

9. MCWD provides water and sewer collection service to the project area pursuant to agreements with the Fort Ord Reuse Authority (FORA), an entity that is scheduled to terminate by the year 2020. The project property is not within MCWD's Sphere of Influence adopted by the LAFCO. Actions by other agencies are required before MCWD can provide water or sewer service. Sub-allocation of groundwater supplies by Seaside and Monterey County is required, with final FORA approval of consistency with the Base Reuse Plan. LAFCO would be responsible for approval of an amendment to the MCWD sphere of influence to and annexation of the properties into the District. All required approvals should be included in the Project Description (page 2-64), including MCWD which would be responsible for approval of service connections up to usage totals

allocated by the respective jurisdictions. MCWD may also be responsible agency with regards to future installation of water and potential sewer lines. [MCWD as the public agency providing water and sewer services to a new development should be classified as a responsible agency since, among other things, the District would be relying on the FEIR for the location and construction of infrastructure to serve the new development, including complying with the FEIR's mitigation measures for temporary construction impacts. MCWD should be listed in the Project Description in Section 2.6 as a responsible agency under "Potential Future Approvals" pursuant to CEQA Guidelines 15124\(d\).](#)

As previously indicated, MCWD staff is available to meet with you, City Staff and/or the developer to discuss these comments. We look forward to receiving a copy of the Final EIR.

Sincerely,

Bill Kocher
Interim General Manager