

July 2, 2013

Mr. Robert Holden
Monterey Regional Water Pollution Control Agency
5 Harris Court, Building D
Monterey, CA 93949

RE: Comments on the Groundwater Replenishment Project's Notice of Preparation of an Environmental Impact Report

Dear Mr. Holden,

Marina Coast Water District (MCWD, District) is pleased to provide Monterey Regional Water Pollution Control Agency (MRWPCA) with comments to the Notice of Preparation (NOP) for the planned Environmental Impact Report (EIR) associated with the proposed Groundwater Replenishment Project (GWR Project).

In general, MCWD supports the GWR Project. MCWD provides these comments within the NOP's described framework of alternatives, mitigation measures and statutory responsibilities.

The District's comments are:

- 1) The District encourages incorporating the GWR project into both the Greater Monterey County Integrated Regional Water Management Plan (IRWMP) and the Monterey Peninsula IRWMP.
- 2) The District encourages MRWPCA to explore alternative source water volumes above the 3,500-acre-feet total specified in the NOP.
- 3) The District's senior rights to return water from MRWPCA's treatment plant need to be recognized when discussing available plant output. The District is willing to consider leasing a portion of those senior rights for a predetermined period.
- 4) The District is willing to discuss with MRWPCA potential access to District recycled water (RW) facilities for conveyance of GWR water from the Advanced Water Treatment (AWT)

facility to the Seaside Groundwater Basin, with appropriate compensation to the District for that right of access. The District requests the inclusion of this option in the EIR.

- 5) The District suggests exploring the long term plan (beyond 15-years) for the GWR Project. Will the GWR project continue injecting water into the Seaside Groundwater Basin once the Seaside Groundwater Basin is recharged and is operating within protective groundwater elevations and sustainable yield? Are there other potential uses for Advanced Water Treatment (AWT) water? One future possibility would be to send AWT water northward to combat seawater intrusion in the Salinas Valley Groundwater Basin.
- 6) The District encourages MRWPCA to evaluate project alternatives that include variable seasonal flow rates of the source waters without the need for including secondary or tertiary effluent water sources. Part of the rationale expressed in the NOP appears to be to obtain and treat enough impaired water to allow the AWT facility to run at a single, predictable flow rate; therefore the seasonality of the water sources appears to be an operational consideration and leads MRWPCA to include effluent water sources in the project. The District would recommend that a project alternative be prepared that uses a treatment facility flow rate model that fluctuates and does not use effluent water sources.
- 7) The District requests that MRWPCA confirm with the California Department of Public Health (DPH) the required residence time (between injection and extraction) for all the proposed water sources prior to publication of the Draft EIR.
- 8) MCWD requests confirming that the capacity of the Seaside Groundwater Basin is sufficient, within that pre-determined residence time, for the injection of additional GWR Project water.
- 9) MCWD requests confirming with DPH, prior to Draft EIR publication, the horizontal distance that will be required between points of injection and points of extraction in the event that those two modes of operation are simultaneously occurring. Will the well spacing requirement and the limited horizontal distance between the proposed coastal recharge facility and the Bay preclude the use of the coastal recharge facility for the GWR?

The District hopes these comments are beneficial and we look forward to working with MRWPCA in advancing regional goals through implementation of the GWR Project.

Sincerely,

Dr. Thomas P. Moore
President, MCWD Board of Directors

Brian C. Lee, P.E.
Interim General Manager / District Engineer