



**November 11, 2015**

State Water Resource Control Board

ELECTRONIC SUBMISSION

Re: Item 7 - Consideration of a proposed Resolution approving Water Recycling Funding Program and Clean Water State Revolving Fund financing for the City of Pacific Grove Local Water Project.

The Surfrider Foundation is a non-profit 501(c)(3) organization that is dedicated to the protection and enjoyment of oceans, waves and beaches through a powerful activist network. Towards this mission, and specifically in support of protecting water quality and marine ecosystems, the Surfrider Foundation Monterey Chapter has been very engaged in the effort to identify water supply and demand--offsetting solutions to reduce the overdraw of water that is currently supplied by the Carmel River and Seaside Groundwater Basin.

Surfrider Foundation generally supports the Project, but still has concerns. The Carmel River has been in deficit for many years. The water that Cal--Am has been using to supply Pacific Grove includes illegal water to which it has no rights. While the "new supply of recycled water" to be produced by the Project may reduce the amount of illegal water taken from the Carmel River, it does not "free up an equivalent volume of potable water for alternate uses" as the SDEIR claims. When Cal--Am complies with the State Water Resources Control Board's Cease and Desist Order by eliminating the illegal diversion of water, the Carmel River will be "in balance"; i.e. there will be neither deficit nor surplus. A surplus is required to have "freed water" for new uses.

The proposed modification presupposes potable water available to be freed, whereas the motivation for the original project is the shortage of water. The environmental benefits that could be created disappear if the shortage remains. When potable water is short, non-essential uses such as watering grass will be reduced. The PGLWP does not create potable water. It allows uses that do not require potable water to continue. The project is claiming water that does not exist. Reducing a deficit creates nothing new.

Changing the project from saving water to shifting it between users, invalidates the premises and conclusions of the previously certified "final" EIR. For example, claims that the PGLWP reduces any impacts assigned to the existing production and use of potable water are negated if the use of that water continues. One can no longer submit claims against the baseline, since the proposed modification is to leave the baseline AS IS.

The proposed Monterey Peninsula Water Supply Project (MPWSP) is planned to replace the current overdraft of Carmel River waters with a desalination plant, along with ground water recharge with recycled water. The proposed MPWSP carries significant economic and environmental costs. The proposed modification ignores those costs and claims "freed potable water" as if some reservoir of pristine water exists that can be drawn from with no consequences.

Respectfully Submitted,



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