FARM BUREAU MONTEREY

May 3, 2013

Mr. Paul Murphey
Division of Water Rights,
State Water Resources Control Board
P.O. Box 2000
Sacramento, CA 95812

VIA: Email to Wr_Hearing.Unit@waterboards.ca.gov

RE: Comments on draft review of California American Water Company's Peninsula Water Supply Project

Dear Mr. Murphey:

Monterey County Farm Bureau represents family farmers and ranchers in the interest of protecting and promoting agriculture throughout our County. We strive to improve the ability of those engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of our local resources.

We appreciate the opportunity to make comments on the Draft Review document ('Draft Review') of the proposed water supply project for the Monterey Peninsula ('MPWSP') by California American Water Company ('Applicant').

Since the identification of seawater intrusion into the Salinas Valley groundwater basin, farmers and ranchers have worked with each other to develop water projects that have led to the slowing of further degradation of this basin. Specific projects (the two reservoirs at the south end of the basin, the Castroville Seawater Intrusion Project, the Salinas Valley Water Project, and the Salinas Valley Reclamation Project) have been funded by the Salinas Valley landowners through self-assessments; present day value for the costs of these projects is around $352 million. In addition, Monterey County enacted an ordinance in 1992 prohibiting groundwater pumping the 180' aquifer in the coastal area between Salinas and Castroville. Together, these measures are working to slow, and hopefully halt, the advancement of seawater into the groundwater basin.

Jeopardy for the Salinas Valley groundwater basin comes from the proposed MPWSP due to the location of the source water intakes, which are currently placed directly

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over the western portion of the basin. As noted in your Draft Review, circumstances of the exact impacts and harm to the basin are not fully understood or adequately documented.

Further studies should be undertaken to determine the full extent of the shallow or sand dunes aquifer for water quality and quantity. These studies should include a determination of the thickness of the Salinas Valley groundwater basin aquitard in the proposed source water project area. Specific hydro geologic investigations are required to make these determinations and include geophysical studies of the immediate area surrounding the source water intakes, as well as boreholes that sufficiently characterize the subsurface formations.

The mechanics of salt water intrusion need to be fully understood before proceeding forward with any project that will remove substantial amounts of source water from the sand dunes aquifer. This requires the development of groundwater models that will assess the long-term impacts to the groundwater basin and conductivity of any waters between the water layers.

We fully support the assessment of hydrologist Tim Durbin and his suggestions for additional hydro geological studies beyond the installation of a source water test well, as proposed by the Applicant for this project. Timing is critical to make these assessments prior to any development of reporting required under the CEQA process, mainly the Environmental Impact Report. An accurate decision cannot be made about impacts and harm to the Salinas Valley groundwater basin without results of these additional tests; to issue an environmental assessment of this project without fully testing these resources is not acceptable. We encourage the State Water Resources Board to engage the Public Utilities Commission to allow a provision in their process that will ensure that results of these additional studies can be included in the fully realized Environmental Impact Report that will ultimately be considered for approval.

The Draft Review does not include any legal analysis of the prohibition against exporting water from the Salinas Valley groundwater basin that is defined by law in the Monterey County Water Resources Agency Act of 1947. This should be considered as one of the major hurdles that this project must overcome in order to adequately obtain source water for the Applicant's desalination plant. We interpret this to include any brackish water incidentally included in the source water extracted, as that is not true seawater by content. Specific water rights held within this Agency Act must be paramount when considering all exportation issues.

An alternative site north of the Salinas River, along Potrero Road, is noted for possible source water intake. This location is also over the Salinas Valley groundwater basin and would have the same constraints, study requirements, and legal issues with

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exportation of water as the primary site. If this is indeed a serious alternative site, we would suggest that these same studies and analysis be conducted in parallel with the primary site, to provide consistency and economies of scale. We believe that the best possible uses of scientific information to guide these approvals are required for all contingencies.

Monterey County Farm Bureau asserts that not enough hydro geological information is known about how the Salinas Valley groundwater basin will respond to desalination source water intakes as presently proposed; indeed, all causation of possible harm and possible degradation must be investigated prior to approving the MPWSP in its present iteration.

It is of greater concern that the prior constructed projects funded by farming operations in the Salinas Valley could be at risk if further harm or degradation does occur due to unintended consequences of the MPWSP.

Your consideration of these concerns is appreciated.

Sincerely,

Norman C. Groot
Executive Director