
Central Coast Regional Water Quality Control Board

June 15, 2016

Matthew Quint
Division of Water Rights
State Water Resources Control Board
E-mail: Matthew.Quint@waterboards.ca.gov

Sent Via Electronic Mail

Dear Mr. Quint:

COMMENTS ON PETITION FOR RECONSIDERATION OF BOARD ORDER WR 2009-0060

Order WR 2009-0060 is intended to eliminate unauthorized diversions from the Carmel River. While California American Water Company (CalAm) is pursuing several major measures to address the potential effects of its continuing unauthorized diversions and to enhance and improve conditions for fish and wildlife resources in the Carmel River, those measures have been delayed to the point that the petitioners seek to modify certain ordering provisions of Order WR 2009-0060. We encourage the pursuit of those major measures; however, the complexity of the major measures could continue to delay resolution of the problem. We would like to point out that there are other measures that CalAm can pursue to alleviate the problem.

Cal-Am owns several wastewater treatment systems in the Salinas area that could be consolidated/regionalized through connections to the Monterey Regional Water Pollution Control Agency (MRWPCA)'s wastewater recycling system. The MRWPCA was formed to address, in part, water shortages in the northern Salinas Valley. CalAm's wastewater treatment systems in the Salinas area typically dispose of wastewater instead of recycling the wastewater. One exception is CalAm's Las Palmas Ranch system, which recycles wastewater for common area turf irrigation—a relatively unimportant use in these times of drought and climate change. The State Water Board should direct CalAm to pursue sending its Salinas-area wastewater to the MRWPCA. Increased wastewater flows could be used by MRWPCA's Pure Water Monterey Project to increase recycled water deliveries either directly to the Seaside aquifer for use by CalAm or to the agricultural irrigation project in the lower Salinas valley. Increased recharge of the Seaside aquifer and corresponding withdrawals by CalAm would directly offset Carmel River use. Increasing water recycling conforms with the State Water Board's Recycled Water Policy, as well as our Basin Plan.

In addition to pursuing consolidation of CalAm's Salinas-area wastewater systems, CalAm could also secure the wastewater from other Salinas-area wastewater systems and send that wastewater to the MRWPCA system. After all, it is incumbent on CalAm to eliminate its unauthorized diversions.

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If you have any questions, please contact **Tom Kukol** at **805-549-3689** or by email at **Tom.Kukol@waterboards.ca.gov**.

Sincerely,

for John M. Robertson
Executive Officer

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