

**To:** Monterey County Board of Supervisors  
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Salinas CA

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**From:** Mr. Eddie Mitchell  
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**Subject:** Public input to the 2007 GPU5 DEIR, PLN #3000196

**A. 12 Guiding Principals**

**A1:** Why are the Board of Supervisor (BOS) approved 12 GPU Guiding Principals missing from the DEIR?

**A2:** Why is the DEIR environmental analysis not correlated to the BOS approved 12 Guiding principals so the BOS and the public can assess the environmental impacts in relation to the 12 Guiding Principals?<sup>1</sup>

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**B. General scale impacts**

**B1:** Page 1-1 declares that project impacts are analyzed on a general scale. Given this approach for providing environmental impact analysis, why are the following "general scale" considerations not addressed?

**B1a:** A table showing where the new sources of water are needed to support new build-out?

**B1b:** A capitalization infrastructure financing plan that supports development and delivery of new sources of water so the public and BOS can understand the magnitude of environmental impact of any new water distribution networks?

**B1c:** The potential environmental impacts of housing build-out without new sources of water, should a 2.5 year or 5 year drought occur during the 20-year life of the General Plan?

**B1d:** The potential environmental impacts of build-out should some percentage of new sources of water fail to materialize?

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**B2:** In numerous places in the DEIR (such as page 4.3-17) there are comments about current water sources having suspect sustainability or significant overdraft. So why does the DEIR present no probability analysis/assessment on the risks of depending upon unproven new sources of water to meet development demand?

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**B4:** Why does the DEIR fail to present any assessment of the risks to the public should a 2-year or 5-year drought occur in the County while allowing build-out prior to required water projects (those needed to provide sustainable water) being built?

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**C. Inadequate Environmental Analysis of the Impacts Related to Water**

**C1:** Why does this DEIR fail to address the potential environmental impacts to coastal cities and other community areas, by the General Plan establishing a public policy of allowing years of housing build-out before "new sources" of water are built?

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**C2:** Why does this DEIR knowingly allow growth without sustainable water for years, inconsistent with the GPU5 policy to "restrains development without a proven sustainable water supply..."?<sup>2</sup>

**C3:** The primary mitigation to overcome higher water usage are "regional and coastal water projects".<sup>5</sup> Why doesn't this DEIR reveal the current Castroville Seawater Intrusion Project (CSIP water injection) has failed to halt seawater intrusion? Why does this DEIR fail to provide any empirical data to substantiate the claim that the CISP has "slowed seawater intrusion in the area"?<sup>6</sup>

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**C2:** Why does this DEIR claim that "regional and coastal water project" mitigations will be beneficial when at page 4.3-25 it states: "There are no documented instances of fully restoring groundwater basins to pre-intrusion levels."

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**C4:** Regarding water supply impacts, Paragraph 1.4.2 admits, "future initiatives are not well enough known to determine that they would avoid this impact." So why doesn't this DEIR address the potential environmental impact of increased saltwater intrusion caused by additional build-out if "regional and coastal water projects" have marginal or zero impact upon slowing saltwater intrusion?

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**C5:** Paragraph 1.4 claims that significant water resource impacts are unavoidable. This unavoidable condition is only unavoidable if development build-out is allowed prior to the establishment of reliable new sources of water or prior to proof that "regional and coastal water project" mitigations are working. So why doesn't this DEIR provide a mitigation to not allow development until new water sources are established or until the MCWRA can provide empirical proof that mitigations WR-1 and WR-2 are in fact reducing saltwater intrusion near coastal cities?

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**C6:** Why does this DEIR fail to provide any empirical engineering evidence of when sustainable water benefit will accrue to any city, community area or rural centers because of the Salinas Valley Water Project?

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**C7:** Why does this DEIR claim a mitigation benefit from "regional and coastal water projects" without sizing the current and increased water draw down/demand and then compare it to the amount of new sources of water from those projects in each of the three watersheds?

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- C8:** What is the empirical data that substantiates the SVWP can provide the amount of new water demand summarized in table 4.3-9 (over 49,000 AFY). | 12
- C9:** What is the empirical data that substantiates the claim on page 4.3-130 that "In the Salinas Valley the SVWP will provide sufficient supply to reverse existing overdraft and seawater intrusion problems and provide water for new development"? This claim anoints the SVWP as the solution for **all** water problems in **all** portions of the valley through 2030. What data shows that such a broad reaching claim is even remotely possible to supply sustainable water to sites over a hundred miles away, to place up gradient like North County, and while overcoming over fifty years of the over drafting of coastal aquifers? | 13
- C10:** What documented instances, from anywhere in the North American Continent or Europe, provide evidence that a project like the SVWP, has re-balanced a water basin of similar sized as the Salinas Valley near an ocean and supplied benefit to far flung water demand sites? | 14
- C11:** What empirical engineering evidence substantiates how new water sources from "regional and coastal water projects" such as the Salinas Valley Water Project, will ever reach the multiple new development areas in the Salinas Valley where demand is anticipated per table 4.3-9? | 15
- C12:** The DEIR on page 4.3-136 reveals that the only new pipe distribution network from the SVWP it to the CISP. None goes to North County and none goes to any other location in the 155 mile long Salinas Valley. Therefore, what empirical data substantiates how the new source of water reach and reach vertical and up-gradient locations such as North County and mid-valley cities while passing through identified aquitards sitting between the SVWP source water and the demand site? | 16
- C13:** At page 4.3-136 the DEIR reports that the SVWP would supply 9,700 AFY for irrigation. Why doesn't the DEIR reveal that 9,700 AFY merely matches the average annual irrigation usage of 9,700 AFY providing no new source of water for new development? Why doesn't the DEIR reveal that this action does nothing to overcome existing overdraft, it only reduces further mining of the coastal aquifer, and does not supplying any benefit to new development in the Salinas Valley out to the year 2030? | 17
- C14:** Why does the DEIR fail to reveal that allowing build-out in the Salinas Valley prior to needed "new sources" of water being built and distributed, draws down the water basin four times more than the 9,700 AFY that the SVWP Phase-1 is injecting into the basin, thus significantly adding to saltwater intrusion and endangering the viability of coastal farms and cities? | 18

- C15:** Table 4.3-8 shows multiple water sources polluted with pesticides and other pollutants, including the Salinas River, the old Salinas River estuary, as well as the Salinas Reclamation Canal. So why does this DEIR fail to reveal the environmental and engineering difficulties that "regional and coastal water projects" (such as the SVWP) will have with removing pesticides so adequate quantities of potable water can be supplied to new development demand sites? 19
- C16:** Why does this DEIR fail to reveal the degree pesticide removal from water flowing past the Marina landfill will or does impact the SVWP and the CISP? 20
- C17:** Table 4.3-7 addresses past data on aquifer over drafting in North County. Why does this DEIR not provide an environmental analysis of the impact of expected new development on the overdraft condition? Why does the table exclude the new development impacts to overdrafting? 21
- C18:** The DEIR identifies a number of possible unfunded projects for generating new sources of water and/or distributing new sources of water. Why does this DEIR fail to provide a risk analysis showing optimistic, most-likely, and pessimistic estimates for when these multiple projects would come on line? Such analysis is a common tool used by decision makers to assess risk of complex projects. 22
- C19:** As structured the DEIR is following an unstated assumption that all projects for generating or distributing new sources of water will come online early in the life of the general plan. Why was this assumption not stated in Section 3.3.1 nor evaluated for risk in the EIR analysis. 23
- C20:** The 1995 FUGRO report estimated that North County would run out of water in 20 years (~2015). Since the release of that report, numerous families are without water in North County and nitrate/arsenic poisoning in North County is significantly worse in still working wells (as shown in this DEIR). So why doesn't this DEIR reveal that empirical and on-site data substantiates that the North County aquifers are failing just as the FUGRO report predicted? Given this failing-aquifer/basin problem, why doesn't this DEIR report the risk to North County areas and to coastal cities caused by allowing continued build-out in the north Salinas valley area before "new sources" of water are available to North County and nearby coastal cities? 24
- C21:** Why does this DEIR ignore the 1995 FUGRO report that sustainable water conditions in North County could only be achieved by limiting development to one residence per ten acres? 25
- C22:** At page 4.3-121 why does this DEIR fail to state that the winery yearly water demand may not include water that is currently being 26

used and may be above and beyond current usage? Why does this section of the DEIR not assess the possible environmental impacts if conversion of Williamson land does not convert as assumed? 26

#### D. Wine Corridor Effects

**D1:** It is well known in California that Napa Valley's wine corridor stimulated a road congesting increase in traffic. Why does this DEIR fail to address the environmental impacts (green house gases, traffic congestion, and safety) from a growth in traffic in the County stimulated by the development of a Salinas Valley wine corridor?<sup>3</sup> 27

**D2:** Why does this DEIR fail to address the cumulative environmental impact of "10 full scale and 40 artisan wineries" in the wine corridor?<sup>4</sup> 28

#### E. Alternative Plans

**E1:** Why does this DEIR fail to point out that significant impacts to water could easily be avoided by first developing new sources of water along with distribution networks prior to allowing development. Another mitigation the DEIR fails to offer is sequencing development after a new water source or new water distribution networks are funded and under construction. Since both of these sequencing mitigations are clearly feasible why were they not presented to BOS decision makers and the public? 29

#### H. Comment Summary:

The above described weaknesses in this DEIR show that this analysis/report is clearly inadequate and fails to inform the BOS and the public of significant environmental effects in regards to potable water supply. Specifically:

This DEIR identifies possible benefits from many unfunded proposed water projects, without revealing the risk of allowing building before any of these projects come online and before any of these projects demonstrate blockage of saltwater intrusion or adequate quantities of potable water. 30

This DEIR presents a public policy of build houses first while hoping future water sources will come on line and future distribution networks will ever reach the new housing – without revealing the risks of such an approach.

This DEIR fails to reveal that the water sources for coastal cities are placed at risk of severe saltwater poisoning by a build first public policy.

Additionally, in regards to water supply impacts, this DEIR does not comply with the CEQA requirement (listed in paragraph 2.1.1) to "identify ways that environmental damage can be avoided or 31

significantly reduced". For example, this DEIR fails to identify or analyze any of the below listed alternatives to avoid significant impacts to water:

**Alternative 1:** Allow build-out to occur once a "new source" of water for the building area has been funded.

**Alternative 2:** Allow build-out to occur once a "new source" of water for the building area are under construction.

**Alternative 3:** Allow build-out to occur once a "new source" of water for the building area are generating potable water.

**Alternative 4:** Allowing build-out south of Soledad now while delaying build-out in north Salinas Valley until "new sources" of water are on-line generating potable water.

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Since all of these sequencing mitigations are clearly feasible why were they not presented to BOS decision makers and to the public?

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**Footnotes:**

1. Pg 1-3 declares 10 GPU Objectives but fails to identify the BOS approved GPU 12 Guiding Objectives.

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2. Pg 1-3 Table 1-1, restrains development without a proven sustainable water supply

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3. Pg 1-4 para 1.2.1 Eatablish the agriculture wine corridor plan to facilitate wineries along a corridor in the central and southern Salinas Valley...

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4. Pg 1-3 Table 1-1, Agriculture Wine Corridor Plan

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5. Pg 1-6 Table 1-2 Mitigatiions, Mitigations para 4.3 Water

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6. Pg 4.3-116