

Monterey County
 Planning and Building
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SENT VIA EMAIL

SUBJECT: COMMENTS ON THE DRAFT EIR FOR THE 2007
 MONTEREY COUNTY GENERAL PLAN

Dear Mr. Holm:

The following comments are respectfully submitted on the subject DEIR.

INTRODUCTION

As a general comment, I find it very odd that the Draft EIR for the 2007 General Plan for Monterey County, a county so reliant on water, and with so many significant issues with respect to water, would fail to *even reference* the report titled *Final Report, Hydrostratigraphic Analysis of the Northern Salinas Valley*, prepared in 2004, and commissioned by the Monterey County Water Resources Agency. Hydrostratigraphy takes hydrogeologic analysis using standard methods to a higher level, using techniques used in the oil industry for years. The DEIR does reference a host of other hydrogeologic reports for the county written up to several decades ago, why not reference this recent report? Could it be that the data produced and evaluated in this report does not necessarily support the proclamation that the Salinas Valley Water Project will simultaneously halt saltwater intrusion and over-drafting of aquifers throughout the Salinas Valley Basin, even as far north as North County?

Despite the severe problems of overdraft and seawater intrusion, which have been recognized in the county for over 60 years, the problems are not only persisting, they are getting even more critical. The DEIR

continually refers to projects in the “further analysis required”, in the planning stage, a pilot test is being conducted, - type phrases as the solutions to these extremely significant problems, and cites them for mitigation of existing problems, as well as for mitigation of what would otherwise surely be a worsening of these problems as population grows, and development increases, over the next 30 years and more. These projects cited as “mitigations” at this point in time have absolutely no guarantee of ever coming to fruition, let alone actually mitigating the problems at hand. At this point in time these supposed mitigations are producing nothing but “paper water”. If halting overdraft and seawater intrusion were as easy as portrayed in this DEIR, they would have been mitigated a long time ago.

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My specific comments follow.

4.3 Water Resources

1. P. 4.3-15 With respect to Pajaro, the DEIR states “Existing land uses within the flood zone remain at risk until flood control improvements are made. Future growth in the Pajaro community would increase the exposure of persons and property to flood hazards”. Development of additional land within the Pajaro River watershed, which also includes large areas of Santa Clara and San Benito Counties, will increase the amount of runoff and increase the risk of flooding, absent serious improvements. How can such a location be designated a Community Area, and what will be done to decrease the threat to persons and property from flooding?

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On-site septic system usage in North County is stated to exacerbate the poor water quality in North County by contributing to nitrate contamination. Many other contaminants – coliform bacteria, viruses, pharmaceuticals, endocrine disrupters, should also be included as degrading water quality as a result of septic system, and more importantly, septic pit usage.

2. 4.3-16 The DEIR’s description of the North County aquifers appears to have some errors in more than one paragraph on this page, as well as on page 4.3-19, under Groundwater Quality.

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3. P. 4.3-25 The DEIR states that “Any significant pumping of groundwater between Salinas and the coast causes seawater intrusion”. Does this mean that pumping of groundwater beneath or east of Salinas does not contribute to seawater intrusion? If not, why not? If seawater intrusion is halted by raising water levels by the coast, will water levels beneath and east of Salinas rise? By what mechanism and by how much will they rise?

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4. P. 4.3-25 The DEIR states "The MCWRA formulated long-term plans to construct and operate facilities to **alleviate** (emphasis added) the seawater intrusion problem with implementation of the Salinas River Basin Management Plan. Alleviate is defined as "to reduce or decrease". It is stated elsewhere in the DEIR that the SVWP will **halt** seawater intrusion. If it won't halt seawater intrusion, how much will it reduce or decrease it? As this project was sold to the public on the basis that halting seawater intrusion was the main goal of the project, if it doesn't halt it, what more would it take to achieve this goal? What about the also touted benefit of halting the overdrafting of all aquifers in the Salinas Valley watershed? If it doesn't halt overdraft and just decreases it, isn't it still overdraft? What tangible benefit(s) will the citizen's of North County see? How much can they anticipate North County water levels rising?

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5. P. 4.3-26 With respect to Salinas River Watershed, the DEIR states "The intrusion of seawater has forced all water supply wells in the affected area of the 180-foot aquifer to be re-drilled into the 400-foot aquifer". It continues that in areas where the 400-foot aquifer has also been impacted by seawater intrusion, the Deep Zone aquifer has become a major source of water. What depth are these Deep Zone wells pumping from, and how much additional energy does it require to do this? As the deep zone water is reportedly 30,000 years old, it is stated that this water is "mined"? Isn't it true that whenever water is pumped at rates faster than it is replaced on a continuing basis that it is also considered to be mined? What is the age of the 180-foot aquifer water? What is the age of the 400-foot aquifer water? What is the age of the water held in the fractures of the granite beneath North County's Granite Ridge area? How does the age of the water correlate with the amount of time it will take for the water to be replaced via natural recharge processes?

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6. P. 4.3-27 The DEIR states, "The North County groundwater subbasins are shown in Exhibit 4.3.7". "Subbasins" should be replaced with "subareas", and the referenced exhibit is 4.3.7, not 4.3.8.

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7. P. 4.3-28 The DEIR states "High levels of arsenic that approach and exceed SDWA levels occur naturally in certain hardrock or bedrock aquifer materials in parts of Monterey County, especially in North County and along the SR68 corridor". Is it the rock that exceeds SDWA levels or the water extracted from its pores and/or fractures? The DEIR continues, "This problem is compounded by the fact that the Environmental Protection Agency (EPA) has recently lowered the standard for drinking water from 0.050 parts per million (50 parts per billion) to 10 parts per billion to protect consumers served by public water systems from the effects of long-term or chronic exposure to arsenic...Individual private and certain small water systems may not be able to achieve these standards – even with treatment – either administratively or technically". Does this mean that people who cannot, or are not required to and don't, remove the arsenic to less than 10 ppb are destined to have increased likelihoods of related problems such as cancer until a new water source/system with acceptable levels is in place? Is further development in areas prone to this problem going to be allowed, even if there is a legal lot of record? What happens to residents whose private wells, or community water systems, cannot meet the new arsenic levels?

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8. P. 4.3-40 The DEIR states "Multiple small groundwater aquifers provide potable water supply to the North County planning area properties". What is the source of this information, and is there a map showing the location of these "small aquifers"?

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9. P. 4.3-40 In regards to North County watersheds, the DEIR states, "Due to demand exceeding supply, the area has been in a state of chronic overdraft since the 1950s. Groundwater extractions are estimated to be twice the average annual recharge. Resultant water supply and water quality problems include falling water levels, seawater intrusion, and extensive areas with nitrate contamination...In addition, intensive agriculture and non-sewered residents have resulted in excessive nitrogen loading that has rendered groundwater non-potable in many areas. Continued overdraft of the aquifer will continue to lower water levels and draw seawater into the basin, reducing more of the storage capacity. Continued nitrogen loading will increase nitrate ion concentrations, degrading the potability of additional domestic water supplies".

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This characterization of the state of the groundwater in North County should alarm the County government and the MCWRA and move them to immediate action, as it sounds like a description of a third world country's water situation rather than one for the gateway to Monterey County, California, USA. Instead, residents in one of the hardest hit areas of the county, Granite Ridge, are forced to reach deep into their pockets to construct and maintain what seems like a ramshackle system, that to date has had some serious legal issues raised concerning it. Is North County going to be totally on its own in solving its water problems? We've been told repeatedly that the SVWP will raise water levels in the Salinas Valley Basin and North County will benefit (we're even paying for the SVWP), and at some time in the future wells may be drilled, and a distribution system built, to bring water to North County. Yet there is no mention of this North County water "project" in the currently proposed General Plan, which one would think should discuss any significant problems and proposed solutions if they are to take place within the next 20 years. We've repeatedly asked for hydrogeologic cross-sections from the Salinas Valley up into North County to show water levels pre- and post- SVWP implementation, being very doubtful of there being an actual benefit to North County. We've asked multiple times and never got an answer as to where these "theoretical" wells might be located. This DEIR should address these environmental issues and the project we only seem to hear about (supposed mitigation of the problem), but never see in print, namely a source of potable water for North County. What exactly are the plan and the associated schedule?

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10. P. 4.3-41 The DEIR states, the PVWM Basin Management Plan estimated that total groundwater pumping will increase to 78,000 AFY by 2040 (Pajaro Valley Water Management Agency, 2002). This exceeds sustainable yield by approximately 54,000 AFY. What is the proposed source of affordable potable water for development of Pajaro as a Community Area?

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11. P. 4.3-20 In discussing common sources of contaminants to groundwater, dry cleaners are not listed. This is a serious problem elsewhere in California and in the country, and it is expected that it would also be in Monterey County.

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Respectfully submitted,

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