February 2, 2009

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SENT VIA EMAIL

SUBJECT: ADDENDUM TO PREVIOUSLY EMAILED COMMENTS ON THE DRAFT EIR FOR THE 2007 MONTEREY COUNTY GENERAL PLAN

Dear Mr. Holm:

The following comments are respectfully submitted as an addendum to the comments emailed on 2/1/09 on the subject DEIR.

4.3 Water Resources (cont.)

12. P. 4.3-15 What impacts do the findings of the Hydrostratigraphic Analysis of the Northern Salinas Valley (Kennedy/Jenks Consultants, 2004) regarding seawater intrusion have on the expected effectiveness of the Salinas River Basin Management Plan? More specifically, what impacts result from the finding that there is transfer of seawater-impacted groundwater from the 180-foot aquifer to the 400-foot aquifer? As a result there will likely be seawater impact landward of the mapped front in the 400-foot aquifer, due to a thin or missing aquitard, which typically separates the 180- and 400-foot aquifers. According to Kennedy/Jenks, it is more likely that in the City of Salinas this aquifer and its production wells will be impacted by inter-aquifer flow from the Pressure 180-foot aquifer to the Pressure 400-foot aquifer similar to that observed in the Fort Ord area". Kennedy/Jenks also states "We predict that seawater in the Pressure 180-foot aquifer will impact production wells in the City of Salinas in about 14 to 16 years (assuming water elevations in the 180-foot aquifer are maintained and a downward

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hydraulic gradient with the lower aquifers does not change appreciably. (Note that since the Kennedy/Jenks report was written 5 years ago (in 2004), the time frame for impact of City of Salinas wells is only 9 to 11 years away.) As the data in Kennedy/Jenks report is so crucial to the water supply of Monterey County's largest City, why was this information not presented and discussed in the General Plan or in its DEIR? Surely this scenario is a potential significant environmental impact that has not been addressed in the DEIR. The DEIR should be amended or an addendum prepared to more accurately present and assess the hydrogeology of the North Salinas Basin. 1

13. 4.3-16 The DEIR states, *"As illustrated by the overdraft conditions, current demand exceeds supply in the major supply areas of the county, an issue also present at the time of the existing 1982 General Plan. Goals, objectives, and policies in that plan addressed the need to 'promote adequate, replenishable water supplies of suitable quality; to eliminate groundwater overdrafting; and to implement a program to prevent further seawater intrusion by developing supplemental sources of water for North County". These issues are the subject of exhaustive groundwater studies and basin groundwater management plans undertaken by the respective water management agencies and the County since the existing 1982 General Plan. While progress has been made by MCWRA, MPWMD, and PVWMA in halting the rate of groundwater level decline and seawater intrusion, these issues remain a significant challenge to sustainable growth based on the goal of a sustainable groundwater supply."* Are we to understand that the SVWP is the culmination of 27 years of exhaustive groundwater studies and basin groundwater management plans undertaken by the respective water management agencies and the County since the 1982 General Plan, since it is being touted as being capable of halting seawater intrusion and Salinas Valley basin overdraft? Is the SVWP really expected to result in the cessation of overdraft conditions in the East Side Subarea, thus also benefiting this subarea, and North County, with rising water levels? Is this still anticipated in spite of the hydrogeologic features identified by Kennedy/Jenks (2004) that indicate the presence of a "transition zone" and an order of magnitude lower hydraulic conductivity in the East Side Subarea as compared to the Pressure Sub Area? 2

Respectfully submitted,

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