



May 20, 2015

Monterey Regional Water Pollution Control Agency
Administration Office
ATTN: Bob Holden, Principal Engineer
5 Harris Ct., Bldg D
Monterey, CA 93940

SUBJECT: DEIR FOR PURE WATER MONTEREY GROUNDWATER
REPLENISHMENT PROJECT

Dear Mr. Holden:

LandWatch Monterey County reviewed the DEIR and has the following comments:

Cumulative Project List

1. Laguna Seca Villas (p.4.1-11) is no longer a pending or probable project having been withdrawn in approximately 2010.
2. Harper Canyon adjacent to Ferrini Ranch for 27 units should be added to the list. The project was approved in April 2015.

Air Quality and GHG Emissions

3. **Table 4.3-4, Air Quality Significance Thresholds** shows the CO threshold as 5502. This appears to be a typo since the threshold is 550 lbs/day. Additionally, this threshold only applies to stationary sources, not indirect sources.
4. The DEIR finds, "Construction of the Proposed Project would result in a one-time emission total of up to 6,039 MT of CO₂eq during the 18 month construction period. The Monterey Bay Unified Air Pollution Control District (MBUAPCD) does not have adopted nor recommended quantified thresholds for assessing the significance of GHG emissions during construction. MBUAPCD staff recommended including construction emissions within operational totals based on the 30-year amortization to provide a full analysis of construction and operational GHG emissions (Clymo, 2014)." (p. 4.3-29).

We disagree with averaging GHG emissions over 30 years since the emissions would actually occur during an 18 month period. This is the period during which emissions would affect climate change. Averaging emissions over 18 months would exceed the threshold of significance of 2,000 metric tons of CO₂eq per year (p. 4.3-16). We also note that the construction period is identified as 18 to 21 months on p. 4.15-6.

5. The DEIR finds there are no locally adopted Greenhouse Gas Emissions Reduction Plans (p. 4.3-32). The City of Gonzales has an adopted Climate Action Plan.
6. The DEIR finds the project would not result in a cumulatively considerable contribution to GHG emissions and global climate change because project greenhouse gas emissions would be below the significance threshold as discussed. As noted above, we disagree that construction emissions should be averaged over 30 years, and we note that the threshold of significance would be exceeded. Further, there is no de minimis level to identify a substantial contribution to a cumulative GHG significant impact such as used in the DEIR. At over 6,000 MT of CO₂eq during the 18 month construction period, this project when combined with all those identified on the cumulative project list would result in a substantial contribution to climate change.

Alternatives

7. The No Project alternative is defined as a continuation of existing conditions as well as conditions that are reasonably expected to occur in the event that a Proposed Project is not implemented. This definition appears to be based on the Monterey Peninsula Water Supply project as a whole, and not just the Groundwater Replenishment Project. This description is inconsistent with the DEIR description of the Proposed Project:

The Pure Water Monterey Groundwater Replenishment Project is a water supply project that would serve northern Monterey County. The project would provide: 1) purified recycled water for recharge of a groundwater basin that serves as drinking water supply; and 2) recycled water to augment the existing Castroville Seawater Intrusion Project' crop irrigation supply.(p. 1-2)

Since Cal-Am must develop a water supply alternative under orders from the State Water Resources Control Board, the No Project Alternative to the project as described in the DEIR would be a larger desalination plant. At a minimum, the No Project alternative (larger desalination plant) as defined herein would have significantly larger impacts on GHG emissions than the Proposed Project because of increased energy demands. Additionally, the No Project Alternative would have greater impacts related to brine disposal since under the Proposed Project (GWR), the desalination brine from the desalination plant would be significantly diluted as a result of mixing with GWR brine. Because GWR will probably be completed prior to the proposed desalination facility, the likelihood of forestalling State penalties is increased. Finally, we expect that there may be other benefits from the proposed project in comparison to a larger desalination plant.

If this definition of a No Project Alternative is rejected, than an alternative based on a larger desalination plant should be analyzed.

Thank you for the opportunity to review the referenced document.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy L. White', written in a cursive style.

Amy L. White
Executive Director