



Denise Duffy & Associates, Inc.

PLANNING AND ENVIRONMENTAL CONSULTING

MEMORANDUM

Date: September 21, 2016
To: Dave Stoldt, Monterey Peninsula Water Management District
Paul Sciuto, Monterey Regional Water Pollution Control Agency
From: Denise Duffy, DD&A
Subject: Pure Water Monterey Project – Response to CEQA Comments on Pipeline Material

The purpose of this memorandum is to provide a written response to comments received from the Water Ratepayers Association of the Monterey Peninsula (“WRAMP”) dated September 19, 2006. This memorandum responds to WRAMP’s statement that a change in construction material for the Monterey Pipeline could result in additional environmental effects that were previously not disclosed in the California Environmental Quality Act (“CEQA”) documentation prepared for the Pure Water Monterey Groundwater Replenishment (PWM/GWR) Project. As a result, WRAMP suggests that additional environmental review would be warranted under CEQA Guidelines Section 15162 or alternatively under either CEQA Guidelines Section 15163 or 15164. **As discussed below, the change in pipeline material would not affect the analysis contained in the certified Environmental Impact Report (“EIR”) or result in any new previously undisclosed environmental effects warranting the preparation of additional CEQA documentation.**

According to CEQA Guidelines Section 15132, when an EIR has been certified additional environmental analysis (i.e., Subsequent EIR) may be warranted if substantial changes in the project are proposed which will: 1) require major revisions of the previous EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant impacts; or 2) require major revisions due to the involvement of new significant environmental effects or a substantial increase in the severity of a previously identified significant impact. In addition, the disclosure of new information of substantial importance, which was not known at the time of EIR preparation, may warrant the preparation of additional environmental analysis if that information shows any of the following: 1) the project will have one or more significant effects not disclosed in the previous EIR; or 2) previously identified significant impacts will be substantially more severe.

At the time the EIR was prepared the specific type of pipeline material was not specified and the EIR appropriately evaluated the potential direct and indirect effects associated with pipeline construction for identified conveyance facilities. The use of ductile iron pipe would not constitute a substantial change in the project such that major revisions of the EIR would be warranted due to the involvement of a new significant environmental effect or the increase in the severity of a previously disclosed environmental effect. Ductile iron pipe is routinely used in water and wastewater pipeline applications and no new direct or indirect effects

would occur in connection with the use of this type of pipeline material. The certified EIR appropriately evaluated and disclosed the potential direct and indirect effects associated with all pipeline construction. A change in the type of pipeline material would not affect the conclusions of the underlying environmental analysis. Moreover, the use of ductile iron pipeline does not constitute the disclosure of new information of substantial importance warranting the preparation of additional CEQA analysis. As a result, the preparation of a Subsequent EIR pursuant to CEQA Guidelines Section 15162 would be inappropriate.

WRAMP suggests that if a Subsequent EIR is not warranted then a Supplement to the EIR (CEQA Guidelines Section 15163) or an Addendum (CEQA Guidelines Section 15164) should be prepared. A Lead Agency may elect to prepare a Supplement to an EIR when: “1) any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and [emphasis added] 2) only minor additions or changes would be necessary to make the previous EIR adequately apply the project in the project situation.” As described above, the use of ductile iron pipe would not result in the disclosure of any significant new information that would warrant the preparation of a Subsequent EIR. As a result, a Supplement to an EIR is not necessary. An Addendum to an EIR may be warranted when “some changes or additions are necessary but none of the conditions” warranting the preparation of a Subsequent EIR have occurred (CEQA Guidelines Section 15164). The selection of a specific type of construction material does not warrant a change or an addition to the previously certified EIR. As discussed above, the EIR did not specify the type of pipeline material, but rather identified that the type of material could consist of a variety of standard materials used in connection with water and wastewater pipeline applications. As a result, the analysis contained in the certified EIR appropriately disclosed the potential direct and indirect effects associated with the Monterey Pipeline. As a result, an Addendum is also not warranted.

The use of ductile iron pipe would have no effect on the analysis contained in the EIR. The disclosure of the type of pipeline material for the Monterey Pipeline would not result in the disclosure of new information requiring major revisions to the certified EIR. No new significant effects or an increase in severity of a previously disclosed impact would occur in connection with the use of ductile iron pipe, which is routinely used in connection with water and wastewater applications. The analysis contained in the certified EIR appropriately identified the potential environmental effects associated with the Monterey Pipeline. Accordingly, no new additional environmental review is warranted.

Excerpt from Ductile Iron vs High Density Polyethylene Pipes

The advantages of Ductile Iron pipes are many and have been proven over many decades and can be summarized as:

- Excellent corrosion resistance
- The physical properties of Ductile Iron do not change with age
- Strength of Ductile Iron is not compromised by time. HDPE's strength is compromised by time as it is subject to creep degradation
- Shop coated Ductile Iron pipe does not require additional corrosion protection in non-aggressive conditions
- Polyethylene encasement provides effective corrosion control for Ductile Iron pipe in most corrosive environments
- Flexible jointing
- Ease of jointing
- Bedding materials not as critical and more flexible than steel pipes
- No site welding
- Reduced installation time
- Impact resistance better than any other pipe material
- Ductile Iron has up to 12 times more impact strength than HDPE ensuring greater security from third party interference
- High tensile and shear strength - Ductile Iron has a tensile strength > 24 times HDPE
- Low expansion coefficient - HDPE has a thermal expansion coefficient > 18 times Ductile Iron
- Cement lining provides good roughness coefficients
- Radial deflection is less than HDPE especially at larger diameters
- Crushing load of Ductile Iron pipe is > 82 times than HDPE pipe
- Axial bending strength is greater than HDPE
- Ductile Iron hydrostatic burst pressure up to 6.1 times the burst pressure of HDPE
- Both Ductile Iron and HDPE pipe would perform well to the chemical composition of raw water

The above advantages lead to a **Whole of Life (WOL) cost that is far superior to HDPE.**