



**MONTEREY PENINSULA
WATER MANAGEMENT DISTRICT**

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May 28, 1998

Rick Medina
Planner II
Seaside Community Development Department
440 Harcourt Avenue
Seaside, CA 93955-0810

Subject: Comments on Notice of Intent to Issue a Mitigated Negative Declaration -- Fort Ord Golf Course Water Well Improvement Project, Conditional Use Permit Application No. UP-98-05

Dear Mr. Medina:

Thank you for providing the Monterey Peninsula Water Management District (MPWMD or District) with a copy of the above-referenced Notice, dated April 28, 1998. It is our understanding that this application is for the construction of a production well to supply water service for irrigation needs at the Bayonet and Black Horse golf courses on former Fort Ord. Our comments on the Negative Declaration and accompanying Initial Study are limited to the water supply aspects of the proposed project, in accordance with the District's authority and responsibility.

- 1. Historical production for golf courses.** The information provided in the Negative Declaration and Initial Study is not sufficient to adequately document the historical water production for use at the golf courses. It is our understanding that historically, irrigation water for the golf courses has been provided from two sources. The primary source has been from the "golf course well" which is the existing well located off of Coe Avenue on former Fort Ord. This well pumps water from the Seaside Ground Water Basin. In addition, irrigation water use at the courses has been supplemented from the Fort Ord "potable supply system". The source of water for the potable supply system is from wells in the Salinas Valley Ground Water Basin. In the explanation for checklist responses (Item 4(f) on pages 16 and 17 of the Initial Study document), it is stated that the amount supplied from the golf course well was in an amount "up to 400+ Acre Feet per Year (AFY) and was augmented from the potable water supply, to the extent of 230 AFY." Because an accurate accounting of the historical water production for the golf courses has been the subject of concern and confusion in previous reports and correspondence, we feel it is important to completely document the source(s) for these water production values. This documentation should include the cited reference(s) and periods of record available. The District would like to request a copy of this documentation, including the agreement between the City of Seaside and the Army that is cited on page 17 of the Initial Study.

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2. **Proposed production from new golf course well.** The District, as the agency responsible for management of water resources in the Seaside Basin, is concerned that the proposed construction of the new well does not result in an increase in the amount of water extracted from the basin, without appropriate mitigation measures in effect. Similar to the comment above, it is not clear from the information provided how much production will occur in the future from the proposed new well and the existing golf course well, as compared to the amount from the potable supply system. More specifically, it is not clear how the proposed production will be limited to the historical production from these sources. In the explanation for checklist responses (Item 12(c) on page 20 of the Initial Study document), it is implied that water production from the Seaside Basin for use on the golf courses would be limited to 400 AFY. However, the proposed Mitigation Measure No. 2 on page 20 does not address a limitation in future well production to that which has been historically produced. This should be clarified or this mitigation measure should be modified accordingly.

3. **Project compliance with MPWMD Rules and Regulations.** The existing water supply system at the golf courses, which has been operated under ownership by the Army since the 1960's, has not been, and is not currently registered as a Water Distribution System (WDS) with the District. Under the District Rules and Regulations (Regulation I, Rule 11), a WDS is defined as:

all works within the District used for the collection, storage, transmission or distribution of water from the source of supply to the connection of a system providing water service to two or more connections including all water-gathering facilities and water-measuring devices, but excluding the user's piping.

Because this definition is broad in nature, it has been the administrative practice of the District to limit the definition of WDS's to those sources of supply (e.g., wells) that provide service to two or more connections on either

(1) separately owned parcels, or

(2) non-contiguous parcels under common ownership.

Because the former Fort Ord had no separate parcel designations, the golf course's water supply system, under ownership and operation by the Army, was not considered as a WDS under the District Rules and Regulations. However, the new golf course well is proposed to be located on a parcel that is now separate and not contiguous with the golf course parcels. Therefore, this will likely constitute a WDS, as defined above. The District has not yet made a determination regarding a WDS permit for the golf courses' water supply system. It is recommended that the project applicant request a consultation meeting with the District

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regarding this issue. Additional information about the WDS permitting process will be made available at that time. In any event, a WDS creation permit, if required, would not need to be secured prior to issuance of the subject Use Permit by the City of Seaside, but would need to be in place prior to delivery of water from the new well source.

Thank you for the opportunity to review the Negative Declaration and Initial Study for this proposed project. We look forward to receiving responses to these comments as this project approval process proceeds. If you have any questions, please contact Henrietta Stern, Project Manager, at 649-4866, so that your questions can be appropriately directed. We appreciate working with the City of Seaside on this matter.

Sincerely,



Darby W. Fuerst,
General Manager

cc: J. Oliver, H. Stern, MPWMD
D. Laredo, MPWMD Counsel
G. Haas, California-American Water Company