



# Jones & Stokes

## Memorandum

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Date: February 8, 2005

To: Henrietta Stern, Monterey Peninsula Water Management District

cc: Gregg Roy

From: Mike Rushton

Subject: **ASR Project EIR Scoping Report and Potential Scope Revisions**

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Henrietta:

We have completed our review of the written and oral comments received during the scoping period for the MPWMD Aquifer Storage and Recovery (ASR) Project Environmental Impact Report (EIR). This memo transmits a scoping report that summarizes the comments received (attached), and a list of issues raised in the scoping process that may require adjustments in our current scope and cost for completing the ASR Project EIR (see below). Following your review of this memo and the attached scoping report, please call so we can receive MPWMD direction on changes to the project and the impact analysis suggested by the public and government agencies.

The comments that are most likely to cause a significant adjustment in our efforts are as follows:

- U.S. Army Garrison, Presidio of Monterey Directorate of Environmental and Natural Resources (DENR) staff requested that the EIR be expanded to provide the documentation necessary to comply with the National Environmental Policy Act (NEPA). Army staff suggest that an Environmental Impact Statement (EIS) may be needed. In a telephone conversation with Robert Guidi of the DENR, it was determined that pipeline and well construction on Army property would likely require an easement and would likely generate biological resource issues. Mr. Guidi suggested a letter be submitted by MPWMD requesting the Army's position on playing a cooperating agency role during the environmental evaluation. He also suggested that a meeting with FOR A and the cities of Seaside and DelRey Oaks would be important.
- Several commenters suggested that the project should be considered a water supply augmentation project in partial compliance with State Water Resources Control Board (SWRCB) Order 95-10. If water supply augmentation is added as a goal, the alternatives analysis may need to be expanded to include a new dam on the Carmel River and Cal-Am's Coastal Water Project (CWP).

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- Cal-Am suggested that Jones & Stokes should coordinate its study with the engineering consultant that is working with Cal-Am on the CWP.
- Cal-Am and others suggested changes to the project description, including:
  - Add water treatment facilities at the well sites so that recovered water could be treated before it is discharged to the Cal-Am distribution system.
  - Construct a 30-inch diameter pipeline along General Jim Moore Boulevard as part of the Phase 1 project, not later phases.
  - Provide facilities that would allow for pumping of extracted water back to the south, into the Crest storage facility.
  - New water treatment capacity is not needed in the Carmel River Valley for Phase 3 water production.
  - Provide unlined surface water storage site on Fort Ord, near the injection/extraction wells.
- Several commenters suggested that the alternatives analysis be broadened to include:
  - injecting recycled water into the Carmel River groundwater basin.
  - injecting Carmel River water into the Laguna Seca sub-basin of the Seaside Groundwater Basin.
  - recharging the Seaside Basin through percolation of either Carmel River water or recycled water on former Fort Ord.
  - using an alternative pipeline route across Fort Ord property (the perimeter road corridor east of General Jim Moore Boulevard).
  - mining groundwater in the shallow aquifers below beach areas.
  - using alternative water extraction techniques on the Carmel River, including collector wells and surface diversions.
  - In wetter periods, take Carmel River water from higher in the watershed than planned, to improve the quality of extracted water.

Other comments or direction provided through the scoping process that may cause some

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adjustment in our level of effort are as follows:

- The State Department of Health Services has requested that a Source Water Assessment be prepared as part of the CEQA process; this effort is not included in the Jones & Stokes scope.
- The Army Corps of Engineers suggested that MPWMD would have to apply for a Clean Water Act Section 404 permit for fill of wetlands or waters of the United States. This effort would include a wetland delineation and a Section 404 b (1) alternatives analysis. We believe this effort will not be needed for Phase 1, but a final determination will not be made until we conduct a field survey of all Phase 1 facilities construction sites.
- Padre Associates suggested that the purpose of the project should be expanded to include an increase in the reliability of the Cal-Am water distribution system. We agree with this added project purpose. We do not believe that this change will add effort to our scope of services, but we should discuss this further.
- Several commenters stressed the importance of a thorough groundwater quality impact assessment. This effort is currently assigned to the MPWMD staff or its consultant Padre Associates. MPWMD should closely evaluate these comments and consider the time allotted to this task.
- FORA is in the process of expanding the road right-of-way along General Jim Moore Boulevard. It is possible that this widening will cause MPWMD to reconsider the location of its proposed pipeline along this right-of-way. More information is being pursued from FORA.
- If NEPA compliance becomes part of the project, the time frame may extend, resulting in additional management costs.

Once you have reviewed and discussed the scoping report and this memo internally, please call so we can resolve scope of work and project description issues. Please give me a call if you have questions.

Mike Rushton, Project Director