



AIA Monterey Bay
A Chapter of The American Institute of Architects

Submitted by staff at
2/12/2013 Board Meeting
Item 3 **RECEIVED**

FEB 11 2013

To: MPWMD

Date: February 11, 2013

MPWMD

Re: Public Comments to the MPWMD (2-12-2013 Public Hearing)
Sizing for a water project for the Monterey peninsula

Dear Directors,

We thank you for the opportunity to provide comments to this very important water project for the Monterey peninsula. We understand the importance of providing for additional water source to address the Cease and Desist Order (CDO) that was issued by the SWRCB, requiring California-American Water Company (Cal-Am) to drastically reduce what has been defined as illegal water withdrawals from the Carmel Valley basin.

As Cal-Am pursues a Desalination project to address the CDO, and both the Mayors and the MPWMD have also been very involved in helping resolve this water shortage, the California Public Utilities Commission (PUC) has taken the lead role in analyzing and approving water solutions within the Cal-Am system.

The purpose of an EIR, per CEQA, is to analyze a project along with alternatives to that project. An EIR also provides a type of 'sensitivity analysis' to see if a potential impact is a linear function as relates to the project size. Similarly, an EIR should evaluate smaller sizes that could potentially eliminate certain impacts if there is another supply alternative (such as Ground Water Replenishment (GWR)).

We were present at the Mayors meeting on January 31, 2013 where the Mayors supported that the EIR further address the following in addition to providing for the full replacement water to resolve the CDO:
Existing Lots of Record..... 1181 AFY
Pebble Beach entitlements.....325 AFY
"Economic rebound".....500 AFY

At the Mayors meeting, Mayor Rubio questioned whether the EIR should evaluate the General Plan build-out as identified in each Jurisdiction's General Plan.

The Board of Directors of the American Institute of Architects Monterey Bay Chapter (AIAMB) has followed the water situation closely over the past 25 years.

Here are our recommendations:

The EIR should be sized to not only completely resolve the CDO, but must also include the 3 parameters outlined above, and recommended by the Mayors group as well, to include providing for water for existing lots of record, making the Pebble Beach entitlements whole, and providing for "economic rebound".



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We also suggest that the EIR at least evaluate a demand to include General Plan Build outs, as suggested by Mayor Rubio. The obvious benefit of doing this is the EIR will then have some data as to how sensitive the sizing is to the potential impacts.

We are aware that some within our communities may have some discomfort providing water for 'growth'. Regardless of our profession, we feel this is a measured and logical suggestion. We need only to point out that the purpose of General Plans is for each jurisdiction to decide, as a community, how growth should be addressed looking 10 to 20 years into the future. Each General Plan requires its own environmental analysis. For those entities charged with providing utilities, not looking at the approved General Plans is tantamount to not doing their job.

We are not saying that the project needs to be resized for General Plan build out. However we are saying that it is very appropriate to analyze how that demand figure, and consequently that project size, would affect the environmental potential impacts and mitigations.

SUMMARY:

The Board of Directors of the AIAMB request the project size is increased to account for existing lots of record, making the Pebble Beach entitlements whole, and providing for "economic rebound". We believe these numbers are, respectively, 1181 AFY + 325 AFY + 500 AFY, or a total additional supply sizing of 2,006 AFY.

We also request the EIR analyze the potential impacts with regard to providing water sufficient to meet the approved General Plans of the jurisdictions within the Cal-Am service area.

We appreciate the opportunity to comment and thank you for providing this forum.

Respectfully,

Michael Waxer, AIA, LEED AP
Chairman for Government Affairs
and
Dan Curran, AIA
President, 2013

Letter submitted via email