

**EXHIBIT 12-A**



DRAFT

July 20, 2021

Mr. Tom Luster  
Senior Environmental Scientist  
California Coastal Commission  
455 Market Street  
Suite 300  
San Francisco, CA 94105

Via Email

**RE: California American Water Company's Amended Coastal Development Permit Application for the Proposed Monterey Peninsula Water Supply Project**

Dear Mr. Luster:

In its August 12, 2020 letter to the Coastal Commission, the Seaside Groundwater Basin Watermaster raised the issue of protective water levels (PWL) for the Basin and stated "*The MPWSP is the only possible supplemental water project before us that is capable of supplying the additional water needed to allow Watermaster to sustain PWL in the Basin.*" By this correspondence, I want to assure you that Pure Water Monterey expansion also has the capacity to provide PWL in the Basin.

Protective groundwater elevations were determined in 2009 using the Seaside Groundwater Basin groundwater flow model and cross-sectional modeling (HydroMetrics LLC, 2009). A subsequent study in 2013 to revisit and update the protective groundwater elevations concluded that the calibrated parameters in the basin-wide model do not indicate that protective elevations should be lowered (HydroMetrics WRI, 2013). The Watermaster has simplified the annual requirements for PWLs which would be 1,000 AFY if at inland wells, but only 850 AFY if at coastal wells.

Taking into consideration Cal-Am's 700 AFY in-lieu recharge of the Basin, available supplies of 11,294 AF would be available each year with Pure Water Monterey (PWM) expansion, as shown below:

Supply Source	w/ PWM Expansion
Pure Water Monterey	3,500
PWM Expansion	2,250
Carmel River	3,376

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Seaside Basin	774
Aquifer Storage & Recovery (ASR)	1,300
Sand City Desalination Plant	94
<b>Total Available Supply</b>	<b>11,294</b>

As shown in the attachment, the new 2022 AMBAG growth forecast indicates even more water from Pure Water Monterey Expansion that could be made available for protective levels, drought reserve, or unexpected growth. Over 30 years there would be additional water available of 27,931 AF or an average of 931 AF per year.

If there was concern over the viability of ASR to provide 1,300 AF per year – even though studies show that over time ASR builds up a drought reserve in average-to-wet years sufficient to handle an extended drought – then PWM expansion could first be used to build up a 5-year ASR reserve of 6,500 AF. Since there already exists 1,290 AF of ASR water in the ground another 5,210 would be required – almost the first 4 years of PWM expansion excess. The 30 years after that would yield 24,131 AF or 804 AF per year on average of excess supply. Further, 700 AF per year becomes available in year 26 after the Cal-Am in-lieu recharge program is concluded, which is not reflected in the attachment.

Thank you for your consideration of the District’s position regarding protective water levels. There is still much work to be done by the Watermaster to consider the infrastructure and revenue source for PWLs, but suffice to say the Pure Water Monterey expansion can make a major contribution to the need.

Sincerely,

David J. Stoldt  
General Manager  
on behalf of the Monterey Peninsula Water Management District

**Attachment**

Calculation of Excess Water Availability  
under Pure Water Monterey Expansion

		Water	
	Water	Demand	
	Supply	Assuming	
	Available	AMBAG	Excess
<u>Year</u>	<u>w PWMexp</u>	<u>Growth</u>	<u>Available</u>
1	11,294	9,825	1,469
2	11,294	9,862	1,432
3	11,294	9,899	1,395
4	11,294	9,936	1,358
5	11,294	9,973	1,321
6	11,294	10,011	1,284
7	11,294	10,048	1,246
8	11,294	10,085	1,209
9	11,294	10,122	1,172
10	11,294	10,159	1,135
11	11,294	10,196	1,098
12	11,294	10,233	1,061
13	11,294	10,270	1,024
14	11,294	10,307	987
15	11,294	10,344	950
16	11,294	10,382	912
17	11,294	10,419	875
18	11,294	10,456	838
19	11,294	10,493	801
20	11,294	10,530	764
21	11,294	10,567	727
22	11,294	10,604	690
23	11,294	10,641	653
24	11,294	10,678	616
25	11,294	10,715	579
26	11,294	10,753	541
27	11,294	10,790	504
28	11,294	10,827	467
29	11,294	10,864	430
30	11,294	10,901	393
			<u>27,931</u>