



**PAJARO VALLEY WATER MANAGEMENT AGENCY**

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October 6, 2006

Monterey County Planning Department  
Attn: Carl Holm, Planning Manager  
168 W. Alisal St., 2<sup>nd</sup> Floor  
Salinas, CA 93901

**RE: Comments on Draft Program EIR for Monterey County General Plan Update**

Dear Mr. Holm,

The Pajaro Valley Water Management Agency has had the opportunity to review the Draft Environmental Impact Report for the General Plan Update and offers the comments and suggested revisions below.

1. **Pages 1-18, 4.3-100, 4.3-102: Public Services Policy PS-3.4.** The proposed language currently reads, in part,

“The County *and all applicable water management agencies* shall not allow the drilling or operation of any new wells in known areas of saltwater intrusion until such time as a program has been approved and funded which will minimize or avoid expansion of salt water intrusion into useable groundwater supplies. The Board of Supervisors would be responsible for adopting the revised policy as part of the 2006 General Plan. The MCWRA will be responsible for implementing the revised policy as outlined in this mitigation measure, in coordination with the MPWMD *and the PVWMA* where applicable. The MCWRA will also include specific information on the status of groundwater quality and saltwater intrusion in affected coastal areas in its annual reports, which will serve as the basis for determination for applicability of this mitigation measure.” (emphasis added).

The PVWMA has been previously unaware of this proposed policy and therefore wishes to discuss the policy with MCWRA staff (e.g., how this policy would be implemented and the implications for local agricultural water supplies) before commenting further.

5-1

2. **Page 4.3-31: PVWMA projects.** Paragraph 6 should be rewritten to more accurately describe the Agency’s projects in the coastal areas. Please amend the paragraph to read as follows.

5-2

“The PVWMA has an approved basin management plan intended to balance the groundwater basin, primarily by replacing coastal pumping with alternative supplies. The current phase of projects includes replacement of a significant portion of coastal groundwater pumping with deliveries of recycled water (from the Watsonville Area Water Recycling Project). Replacement water will be delivered via the concurrent construction of a series of pipelines (Coastal Distribution System Project) to reduce seawater intrusion rates within the coastal areas of the Pajaro Basin. The PVWMA is also engaged in an integrated regional water management planning effort with San Benito County Water District and Santa Clara Valley Water District. Through this effort, water supply options to obtain the remainder of the replacement supplies will be identified and presumably will include a combination of conservation and supplemental water supplies from inland areas within the watershed or elsewhere as available.”

5-2 Cont.

3. **Pages 4.3-65/66 and 4.11-45/46: PVWMA description.** The description of the Agency appears to be somewhat outdated and should be rewritten to more accurately describe the Agency’s current BMP and projects. Please amend the last two sections of the Agency’s description to read as follows:

“PVWMA has studied the issues of overdraft, storage depletion and seawater intrusion for many years. These studies were used to formulate a the first Basin Management Plan (BMP) and program-level EIR in 1993. ~~According to these plans the preferred alternative to meet water supply demands are importation of water, limited extraction of local surface supplies, and water conservation elements that are identified in the 1998 Water Supply Project EIR.~~ In 2002, PVWMA adopted a Revised BMP and associated project level EIR/EIS. The five primary components to meet water supply demands set forth in the Basin Plan were:

- Piping of Pipeline construction to import historical existing entitlement of water from the San Felipe Unit of the Central Valley Project (CVP), with supplemental purchasing as deemed necessary of additional entitlements. Aquifer Storage and Recovery may also be used to “bank” larger wet year CVP deliveries and recover them in dry years.
- Capture, recharge and recovery of local surface supply from the Pajaro River, College Lake and the Watsonville and Harkins Slough and deliver the recovered water via pipelines to coastal farms north of the Pajaro River. This project was completed in 2001;
- Construct the Watsonville Area Water Recycling project to treat wastewater flows from the Watsonville area and deliver the resulting recycled water to farms in the coastal area of the basin.
- Construction of a coastal distribution pipeline system to deliver irrigate irrigation water to approximately 8,500 acres of agricultural land with a blend of imported, or local, Harkins Slough, inland groundwater and recycled water supplies;

5-3

- ~~delivery of imported and local water to irrigate approximately 8,000 acres of agricultural land an inland distribution system to in wet years; and~~
- Agricultural and urban water conservation programs.

~~This plan was modified since a 1997 voter referendum imposed a 10-year moratorium on the construction of the import pipeline and restricted PVWMA's augmentation fees to \$50. As a result local projects and conservation elements are now being prioritized. Agency projects are funded by a combination of: "augmentation" fees of \$160 per acre foot of groundwater pumped, delivery charges to users receiving water from PVWMA projects and significant federal and state grants. Combined annual yield of the local projects and conservation will be less than 10,000 AFY of the 28,000 AFY shortfall in the Pajaro Valley.~~

5-3 Cont.

4. **General comment regarding availability of additional PVWMA information.** Please note that additional text describing the PVWMA's projects and activities can be found in the February 2006 Municipal Service Review for North County recently completed by LAFCO. Also, a description of on-going construction projects, as well as efforts to obtain imported water supplies can also be found on PVWMA's recently updated (July 2006) website at [www.pvwma.dst.ca.us](http://www.pvwma.dst.ca.us). The website contains a wide range of current information that was previously only available at the Agency office.

5-4

Thank you for the opportunity to comment, and we look forward to seeing the Final EIR and discussing the issues related to Policy PS-3.4.

Sincerely,

  
Bruce Laclergue

General Manager, PVWMA

cc: Board of Directors, PVWMA  
Supervisor Louis Calcagno, Monterey County  
Curtis Weeks, General Manager, MCWRA