

MONTEREY COUNTY

WATER RESOURCES AGENCY

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November 24, 2010

Jacqueline Onciano, Planning & Building Services Manager
Monterey County Resource Management Agency
Planning Department
168 W. Alisal Street, 2nd Floor
Salinas, CA 93901

SUBJECT: Paraiso Springs Resort (PLN 040183) Response to Preliminary Engineering Reports for Paraiso Hot Springs Resort, prepared by CH2MHILL, dated August 2010.

Dear Ms. Onciano:

After reviewing the subject reports the Monterey County Water Resources Agency (Agency) has the following comments:

Water Demand

The *Estimated Potable Water Demand and Potable Water Source Technical Memorandum* contained within the subject reports did not include the following assumptions in the water balance calculations:

- Pre-project water use and Pre-project recharge
- Post-project water use for the spa facility
- Post-project recharge

The Agency recommends the Paraiso Springs Resort water balance follow the water balance template prepared for the Omni Subdivision (PC 020344). The revised water balance analyses should be included DEIR.

Drainage Analysis & Drainage Plan

According to the *Hydrology and Hydraulic Analysis and Erosion Control Measures Technical Memorandum* contained within the subject reports, detention ponds are not proposed and stormwater runoff will be mitigated through the use of retention/infiltration facilities. Therefore, the project does not comply with the Agency's standard design policy that requires stormwater detention facilities designed to limit the 100-year post-development runoff rate to the 10-year pre-development rate.

If stormwater retention facilities are proposed, the design criteria should be approved by the Agency prior to the preparation of the preliminary drainage calculations and preliminary drainage plan. Additionally, a geologic report should be included in the DEIR analyzing the suitability of subsurface materials for stormwater retention, and the potential impacts to geologic hazards should be analyzed.

The memorandum did not include information regarding the proposed stormwater retention design criteria, preliminary drainage calculations, or a preliminary drainage plan. These items should be included in the DEIR.

Stream Setback

The Draft EIR should include a site plan showing all proposed development setback 50 feet from *top-of-bank* (as defined in Monterey County Code Chapter 16.16) of the watercourse referred to in the ADEIR as the “Paraiso Springs drainage”. If development is proposed within 50 feet of the *top-of-bank*, the DEIR should address the two provisions outlined in Chapter 16.16.050K of the Monterey County Code.

The Agency requests the opportunity to review the water balance analyses, preliminary drainage analysis, preliminary drainage plan, and the stream setback plan prior to the release of the DEIR. If you have any questions, please feel free to contact me at (831) 755-4860.

Sincerely,



Jennifer Bodensteiner, CFM
Water Resources Hydrologist
Floodplain Management and Development Review Section