

**Seaside Basin Watermaster
2600 Garden Road, Suite 228
Monterey, CA 93940**

June 27, 2015

Mr. Andrew Barnsdale
California Public Utilities Commission
c/o Environmental Science Associates
550 Kearny Street, Suite 800
San Francisco, CA 94108

Subject: Comments from the Seaside Basin Watermaster on the Draft Environmental Impact Report on California American Water's Monterey Peninsula Water Supply Project, dated April 2015.

Dear Mr. Barnsdale:

The Seaside Basin Watermaster submits the following comments and questions regarding the Subject document.

Pages ES-3, 2-6, 2-13, 3-3, 3-12, 3-56: The agreement regarding payback of Cal Am's overpumping of the Seaside Basin was formalized and executed between Cal Am and the Watermaster through Amendment No. 1 to the December 3, 2008 MOU pertaining to repayment of Cal Am's Replenishment Assessments for overpumping. This Amendment No. 1 was signed by the Watermaster on April 25, 2014 and by Cal Am on June 6, 2014. Thus, the agreement is no longer "tentative." This correction should be made by deleting the word "tentative" in Footnote "b" on pages ES-3 and 3-12, in Footnote "3" on page 3-3, and in the text on pages 2-6, 2-13, and 3-56.

Pages ES-44 (Impact 4.4-1) and 3-49 (Section 3.5.7): Development of the two ASR wells proposed by the Project will involve groundwater pumping. The quantity of water is not specified, but for development of the deep injection wells proposed for the Groundwater Replenishment Project, development of that Project's four wells would involve extracting a total of approximately 45 acre-feet. Therefore, it appears that approximately half that amount, around 20+ acre-feet, would be involved in development of these ASR wells. The Adjudication Decision does not appear to make any provision for this pumping, and makes no allocation of groundwater pumping for this purpose.

The EIR should comment on the significance of this activity and discuss mitigation measures if warranted.

Pages ES-45 (Impact 4.4-3) and 3-55 (Section 3.6.2): Routine back-flushing of the ASR wells is discussed in these locations in the DEIR, but no estimate of the quantity of water that will be extracted from the aquifer during these back-flushing events is mentioned. The DEIR for the Groundwater Replenishment Project states that “Based on the experience of the Water Management District in the operation of its nearby Aquifer Storage and Recovery wells, back-flushing of each deep injection well would occur about weekly...” On an annual basis the volume of water that will be extracted from the Santa Margarita aquifer by back flushing could be substantial.

The EIR should comment on the significance of this activity and discuss mitigation measures if warranted.

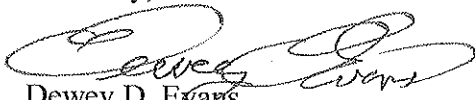
Page 2-24 (Section 2.6.2.1): This Section notes that Cal Am’s Carmel River water rights could be further reduced by the SWRCB by an additional 895 AFY due to silting of the Los Padres Reservoir. If this occurs how will the water lost from this be replaced?

Page 2-25: Correct “747” to “774.”

Page 4.4-72: It is stated on this page that ASR Wells No. 5 and 6 will inject/extract from the shallow (Paso Robles) aquifer, but on page 3-38 (Section 3.4.4.1) and in several other places it states that they will inject/extract from the deeper (Santa Margarita) aquifer. Please correct these apparent conflicts in the wording.

If you have any questions regarding these comments, please contact Mr. Robert Jaques, Technical Program Manager, at (831) 375-0517 or by email at bobj83@comcast.net.

Sincerely,



Dewey D. Evans
Chief Executive Officer
Seaside Basin Watermaster