

June 15, 2018

Board of Directors  
Care of Paula Riso, Clerk to the Board  
Marina Coast Water District  
11 Reservation Road,  
Marina, CA 93933  
priso@mcwd.org

Re: Water Supply Assessment for Campus Town Specific Plan

Dear Members of the Board:

I write on behalf of LandWatch Monterey County to object to the proposed adoption of the Water Supply Assessment and Written Verification of Supply for the Campus Town Specific Plan (“WSA”), appearing as item 10c on your June 18, 2018 agenda.

The WSA is flawed because it wrongly assumes 6,600 afy water supply is available for use in the Ord Community. The Board should be familiar with LandWatch’s objections to this blithe assumption, objections that were most recently set out in my February 19, 2018 letter to you, and in hydrologist Timothy Parker’s February 15, 2018 letter, concerning the proposed annexation of Fort Ord parcels. The 6,600 afy supply is not a firm commitment because the Fort Ord Reuse Plan provides that it can only be used if salt water intrusion is not aggravated. Moreover, the 6,600 afy supply is not reflective of baseline use or sustainable yield.

Despite its obligation to disclose the effect on users reliant on the same groundwater source, the WSA fails to acknowledge overwhelming evidence that additional groundwater pumping from either the 400-foot or Deep Aquifer will result in serious adverse effects on other users. As hydrologist Parker has explained, additional pumping would contribute considerably to significant cumulative impacts, including salt water intrusion, falling groundwater levels, and depletion of the Deep Aquifer.

Neither MCWD nor any other agency has yet determined the sustainable yield of the Deep Aquifer, or even determined its actual storage capacity. The WSA cannot claim that the Deep Aquifer is part of a reliable 20-year water supply with no data or analysis. To our knowledge, MCWD has no concrete plans or commitments to conduct the work that would be necessary to make these determinations. And while the County has recently indicated that it intends to study the question, it has no timeline or resources for this study.

The WSA fails to acknowledge that recent mapping demonstrates rapid advance of the salt water intrusion front and that the County has ordered a moratorium on additional groundwater pumping from the areas proximate to that front and from the Deep Aquifer. Even if MCWD's pumping is currently exempted from this moratorium, the WSA fails to consider the likelihood that pumping restrictions may still be imposed by the County's own authority and/or under SGMA. Accordingly, the conclusion that groundwater will be available for the existing and planned new use over the 20-year horizon cannot be supported without this important qualification.

The WSA fails to disclose that MCWD has no right to use more than 5,400 afy from the 180-foot and 400-foot Aquifers and has committed not to increase its pumping from the Deep Aquifer by more than 1,400 afy over 1996 levels in its 1996 and 1998 agreements with MCWRA and FORA. Thus, for example, the WSA's claim in Table 4-1 that there is 3,326 afy of pumping capacity available from well 34 in the Deep Aquifer (or from any other interconnected wells) is likely inconsistent with the 1996 and 1998 agreements. The WSA should be revised to explain just how much additional pumping is actually available from the Deep Aquifers in light of the 1996 and 1998 agreements and in light of the limitations on pumping from the 180-foot and 400-foot Aquifers.

Because there is a significant possibility that salt water intrusion may render pumping from MCWD wells in the 400-foot aquifer infeasible within the next 20 years, the WSA's claimed capacity for wells in the 400-foot Aquifer to serve the Ord community does not reflect a *reliable* water supply. The WSA's claims regarding reliability of the supply should be qualified.

LandWatch asks that MCWD modify the WSA to reflect the hydrologic realities and uncertainties of MCWD's groundwater supply. For too long MCWD, FORA, and its member agencies have simply ignored the fact that the Ord Community has already exhausted the available groundwater supply.

Yours sincerely,

M. R. WOLFE & ASSOCIATES, P.C.

A handwritten signature in blue ink, appearing to read 'JF', is written over a light blue rectangular background.

John Farrow