

September 23, 2014

Via E-mail

Richard LeWarne
Assistant Director
Environmental Health Bureau
County of Monterey
1270 Natividad Road
Salinas, CA 93906
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Re: Harper Canyon Well Test

Dear Mr. LeWarne:

I write on behalf of LandWatch Monterey County regarding the proposed source capacity test for the Harper Canyon subdivision project.

In your September 4, 2014 letter to Amy White, you acknowledged that the development project will rely on two wells, the Oaks Well and the Harper Canyon Well (also known as the “New well” in the EIR).¹ Your letter indicated that because the Oaks Well is an alluvial well it would only be required to perform an 8-hour source capacity test.

The Harper Canyon project is being processed in accordance with the requirements of the 1982 Monterey County General Plan. Policy 6.1.4 of that Plan specifically requires that pumping tests in the Toro area be conducted for 72 hours, regardless of the well type. The Draft EIR for the project indicates as much, and indicates that the 2000 source capacity test for the Oaks Well was in fact a 72-hour test, notwithstanding its alluvial status.²

A longer source capacity test provides much more reliable information on well capacity. Indeed, the Geosyntec report cited by the Final EIR points out that short term tests in the El Toro area have been unreliable:

¹ Richard LeWarne, letter to Amy White, Sept. 4, 2014. Your letter also implied that Harper Canyon Well may not be required to provide a current source capacity test. For the reasons set out in my September 11, 2014 letter, the Harper Canyon Well should in fact be required to provide a current source capacity test .

² Harper Canyon DEIR, pp. 3.6-9, 3.6-17

“Production rates reported to MCEHD are commonly based on short-term data that provide overly optimistic estimates of well yield that may not reflect sustainable pumping conditions.”³

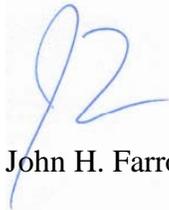
Finally, it was clearly intended that the retesting of the Oaks Well provide information on changes to the aquifer since 2000. It would be difficult to compare the results of the 2000 and 2014 tests if the tests are not of comparable durations.

In sum, the proposed retesting of the Oaks Well should also be a 72-hour test to comply with the 1982 General Plan, to provide reliable results, and to ensure that the results can realistically be compared to the 2000 test results.

Again, we observe for the record that source capacity tests would at most establish that the project may be better situated than others to exploit the admittedly overdrafted aquifer. However, the source capacity tests cannot obscure the fact that the project will make a considerable contribution to the existing significant cumulative impact on the aquifer. Nor can the test obscure the fact that groundwater mining is inconsistent with the 1982 General Plan requirement for a sustainable water supply.

Yours sincerely,

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

A handwritten signature in blue ink, appearing to read 'JH Farrow', is positioned above the printed name.

John H. Farrow

JHF:hs

Cc: Amy White

³ Geosyntec Consultants, El Toro Groundwater Study, July 2007, p. ES-3.