



July 22, 2014

Richard LeWarne, Assistant Director
Environmental Health Bureau
1270 Natividad Road
Salinas, CA 93906

RE: HARPER CANYON WELL TEST

Dear Mr. LeWarne:

The purpose of this letter is to provide comments on any test undertaken for source well(s) purporting to provide service to the proposed Harper Canyon development.

LandWatch expects that all wells intended to provide water will be tested.

LandWatch expects that any test will be for at least 72 hours in accordance with section 2A of the Source Capacity Testing Procedures, and we note that the 2002 test was in fact for 72 hours based on the non-alluvial nature of the source. However, the test needs to be for 10 days if the applicant intends to take advantage of the 50% credit of the approved well yield pursuant to section 2B of the Source Capacity Credit.

We note that section 1E of the Source Capacity Testing Procedures requires monitoring wells within 1000 feet. We ask that the test monitor all wells within 2000 feet given the size of the proposed wells and given the uncertainty as to whether the aquifer is confined or unconfined at the well sites. Drawdown impacts to neighboring wells would be greater if the well sites are located at confined aquifers. We believe there are a number of wells within 1000 and 2000 feet. For instance, there are wells located at: 97 San Benancio Road containing a single home well; 99 San Benancio Road, also a single home well; 109 San Benancio Road has one well servicing six single family homes; and one well at 90 San Benancio Road servicing one single family home. This list is not exhaustive. We ask that DEHS ensure that each well is monitored since drawdown effects may vary by site.

We would appreciate it if DEHS would advise us of the proposed date and time for the well tests. We ask also that DEHS require that the results be reported and made available in electronic format.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Amy L. White', written in a cursive style.

Amy L. White
Executive Director