



Carmel Area Wastewater District

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March 26, 2004

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Sent by facsimile 3/26/04
Original to follow

3/26/2004
#84

Re: Comments on Pebble Beach Company
Del Monte Forest Preservation and
Development Plan DEIR

Dear Mr. McCue:

I have reviewed the draft EIR and will confine my comments to two areas as they relate to the Carmel Area Wastewater District.

Wastewater Conveyance and Treatment Capacity

The wastewater from Del Monte Forest is transported to the District's treatment plant in sewer lines owned by the Pebble Beach Community Services District. Therefore, sewer line capacity is not an issue for this District. The Pebble Beach Community Services District has submitted comments on this subject. I concur with their recommendations.

The District has a wastewater treatment capacity of approximately 3 million gallons per day (mgd). The total dry weather influent flow ranges between 1.48 and 1.89 mgd. The treatment plant hydraulic capacity is about 9 mgd. The DEIR estimates wastewater flow from the Preservation and Development Plan to be 0.113 mgd. Even though the District uses higher per capita flow estimates, 100 gallons per capita vs. 70 gallons per capita, the treatment plant has adequate capacity to provide for this additional flow. The District's use of 100 gallons per day per capita is a parameter developed many years ago. The 70 gallons per day per capita parameter

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is a more accurate number for this area under present-day conditions.

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Wastewater Reclamation

The District, at present, is responsible for the tertiary treatment plant that generates recycled water for use on seven golf courses and for landscape irrigation at Stevenson School. The DEIR accurately states the annual recycled water generated from those facilities to average 664 acre feet per year. Although approximately 1500 - 2000 acre feet of wastewater effluent is potentially available annually (based upon average yearly flow), only "on demand" recycling is practiced, since the Project maintains virtually no storage capacity.

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Water quality adheres to the requirements of California Code of Regulations, Title 22, Water Reclamation Criteria and complies with Waste Discharge Permit 93-72 issued by the California Regional Water Quality Control Board. Total dissolved solids are limited under the permit to 1200 mg/h. There are no limitations in the permit on sodium. Sodium is a concern due to the sensitive nature of the turf grass primarily growing on Del Monte Forest golf courses. All of this information on present-day conditions, is accurately covered in the DEIR.

Phase II of the Recycling Project (CAWD/PBCSD Wastewater Reclamation Project) is designed to address issues of water quality and quantity. Water quantity shortfall will, for most years, be mitigated by using Forest Lake as a storage reservoir. This assumption is based upon the nine years of water use data generated by the present project and the use of 150 acre feet per year of water as the required parameter for a new golf course. This number was provided by the Pebble Beach Company. The amount of recycled water required is based upon an average year. It appears, at this point in the planning of Phase II, that water demand will be achieved 14 out of 15 years. The District is not concerned about water demand from a liability and operations point of view. The Project can only deliver what is available as influent to the advanced treatment facilities. Therefore, CAWD can only produce recycled water from the available supply. This is recognized by all parties associated with the development of Phase II. It is noted, nonetheless, that the number we use for future demand is different than those presented in the DEIR. The existing demand that we use and as listed in the DEIR is basically the same (about 1100 acre feet). However, the only future use we have considered is that of an additional golf course with an average yearly use of 150 acre feet of water. Usage in other areas is not considered and, although water would be provided for other uses if it is available, the only real demand considered is for a new golf course. It should be also noted that, generally as demand for recycled water increases, available influent will decrease. That is, wastewater flow generally decreases during years when precipitation is less than normal. The greater the decrease in precipitation, the greater the decrease in wastewater flow (supply for the Project).

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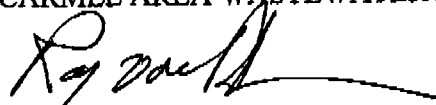
Water Quality statements, as related to water recycling, presented in the DEIR appear accurate and agree with present and future criteria used for the Recycling Project. One statement did seem to need further clarification. The golf courses evidently have stated to the drafters of the DEIR, a limitation on nitrogen as nitrate of 30 mg/L when "increasing problems" may occur for golf course turf management (Section 3.4, page 28, line 33). Although we do not expect this to be a problem with the wastewater recycling project water available, there presently is no planned limit set for nitrogen.

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Please give me a call if you have any questions concerning this letter.

Very truly yours,

CARMEL AREA WASTEWATER DISTRICT



Ray von Dohren
General Manager

RvD/faw