



MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

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November 10, 2004

SENT VIA FAX AND REGULAR U.S.MAIL
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Thomas A. McCue
Senior Planner
Monterey County Planning & Building Inspection Department
2620 First Avenue
Marina, CA 93933

**SUBJECT: MPWMD COMMENTS ON PARTIAL REVISION TO THE DRAFT EIR
FOR PEBBLE BEACH COMPANY'S DEL MONTE FOREST
PRESERVATION AND DEVELOPMENT PLAN - SCH #2002021130**

Dear Mr. McCue:

The Monterey Peninsula Water Management District (MPWMD) appreciates this opportunity to comment on the above-referenced Partial Revision to the Draft EIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan (Partial Revision). MPWMD previously submitted comments on the initial Draft EIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan in a letter dated March 22, 2004, and sent a second letter dated June 8, 2004 to clarify our one of the issues addressed in the first letter. It appears that comments in our letters on the initial Draft EIR have been addressed in the Partial Revision.

The proposed project includes a new 18-hole golf course, a new driving range, and 160 new visitor-serving units (173 rooms); relocation of the existing Equestrian Center; creation of 33 residential lots within 5 subdivisions; and construction of 60 employee housing units.

The MPWMD is responsible for water resources management for the Monterey Peninsula, including the Carmel River Basin, Seaside Groundwater Basin and the Del Monte Forest area. Our comments follow.

Chapter P1. Water Supply and Demand

Comment: Mitigation Measure PSU-D3 (page P1-19). This mitigation measure specifies that either 30 acre-feet of tertiary treated water be provided to the lagoon, or that potable water consumption be reduced by 41 acre feet, during the period "between June and October" of "wet years." A wet year is "defined based on a water year in which annual rainfall [between October and May] exceeds the 50-year average by more than 25%." If this measure is to be adopted, the periods "between June and October" and "between

P-35

1

2

Thomas McCue
MPWMD Comments on Partially Revised Pebble Beach DEIR
November 10, 2004
Page 2

October and May" should be defined: are they June 1 through October 30 and October 1 through May 31, or other periods? Also, the location of a specific precipitation gage to be used to determine whether a year is wet or not should be specified. In addition, the mitigation measure should state what party, agency, or individual is responsible for making such determination.

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More importantly, however, MPWMD is concerned that it may not be possible to achieve this mitigation measure by discharging tertiary water to the Carmel River lagoon in some wet years. In periods such as December 1982 through May 1984 and December 1998 through July 1999 there was continuous flow to the lagoon. Discharging tertiary water to the lagoon during periods such as these would not necessarily be beneficial, and in some conditions may not be advisable. Also, there is limited benefit to adding water to the lagoon during wet years as compared with discharging during dry and normal years.

3

Similarly, the definition of the "Additional Conservation Option" is unclear. On page P1-21, first full paragraph, first sentence, it is stated, "If this option is an adopted mitigation for this impact, the applicant shall be responsible to provide an additional 41 AF of conservation of potable water to offset the project's increased withdrawal from the Carmel River between June and October of a wet year as described below. The 41 AF is the estimated total increase of project demand between June and October." If it is intended that the potable use by "the project" (ranging between 86 AF in a Low Use [Wet Year] and 100 AF in a Very High Use [Very Dry Year], according to Table G.2-1B) be reduced by 41 AF "between June and October," it is unreasonable to expect this amount of conservation savings. If the applicant is expected to be responsible for causing a reduction in potable water use of 41 AF throughout the Cal-Am service area, it is unclear how the applicant can compel such reductions.

4

Thank you for this opportunity to review the Draft EIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. If you have any questions regarding this letter, please contact me at 658-5620.

Sincerely,



Andrew M. Bell
District Engineer

cc: David A. Berger, MPWMD General Manager
Henrietta Stern, MPWMD Project Manager
Stephanie Pintar, MPWMD Water Demand Manager