

MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY

Carl P. Holm, AICP, Acting Director
John Guertin, Acting Deputy Director

Daniel Dobrilovic, Acting Building Official
Michael Novo, AICP, Director of Planning
Robert K. Murdoch, P.E., Director of Public Works



168 W. Alisal Street, 2nd Floor
Salinas, CA 93901
<http://www.co.monterey.ca.us/rma>

July 30, 2015

Linda G. McIntyre
Moss Landing Harbor District
c/o Aspen Environmental Group
235 Montgomery Street, Suite 935
San Francisco, CA 94104

Subject: Notice of Preparation, Environmental Impact Report for
People's Moss Landing Water Desalination Project

Dear Ms. McIntyre,

Thank you for the opportunity to review and provide comments on the Notice of Preparation (NOP) for the Environmental Impact Report (EIR) for the People's Moss Landing Water Desalination Project (Project). The Monterey County-Resource Management Agency has the following comments regarding the NOP and Project:

- The NOP states that the purpose of the Project is to provide desalinated water to portions of Monterey County, with the majority being provided to the Monterey Peninsula area. Page 2 of the NOP states, however, that up to 1,000 acre-feet per year could be provided to the City of Watsonville, which is located in southern Santa Cruz County. The Draft EIR and future Project-related documents should note that the Project may serve communities beyond Monterey County and describe the physical improvements and infrastructure necessary to do so.
- The NOP (Pages 4 and 5) is unclear whether the capacity of the proposed Terminal Reservoir near the City of Seaside will be 5 or 10 million gallons. The Draft EIR should clarify this.
- Page 6 of the NOP states that, "Equipment and other construction materials may require sites for storage, staging." Given the large, regional scale of the Project and the amount of new infrastructure proposed, it seems certain that construction-related storage and staging will be necessary. The DEIR needs to describe how material storage and construction staging will be handled and any impacts and mitigations associated with these activities.
- Project Alternative B described on page 7 of the NOP states that a sub-surface water intake may not be considered technically feasible, which is the reason the Project proposes an open bay water intake. In discussing regional alternatives (page 8), the NOP references the proposed California American Water Company desalination facility (Cal Am Facility) that would be located north of the City of Marina, for which a DEIR was

recently issued. As noted in the NOP, the proposed Cal Am Facility would use sub-surface slant wells for seawater intake. Given this, the DEIR for the Project needs to distinguish why sub-surface intakes do not appear feasible, particularly since open bay intakes, as acknowledged in the NOP, pose potentially greater impacts to marine life.

- Given the complexity of the Project and the number of Federal, State and local agencies involved in the regulatory and development entitlement processes, the DEIR needs to clearly specify all of the agencies involved and their responsibilities related to the Project.
- Page 11 of the NOP states that, in addition to the California Environmental Quality Act (CEQA), the Project may “also subject to the National Environmental Policy Act (NEPA).” Since this is likely the case, is an Environmental Impact Statement (EIS) also being prepared for the Project? Will an EIR/EIS be the principal environmental document? If so, the NOP should have disclosed this.

In addition to the comments above, the Monterey County Environmental Health Bureau (EHB) has coordinated with the Health Department’s Planning, Evaluation and Policy Unit (PEP), and has the following comments regarding the Project EIR:

EHB, Hazardous Materials Management Services requests that the EIR fully address the following issues:

- How will the existing contamination of soil and groundwater be handled at the proposed location (i.e., the old Moss landing Commercial Park/National Refractories)?
- What is the proposed method of chemical storage and handling at the facility?

PEP is interested in seeing that the following issues are addressed in the EIR regarding the potential health impacts of the proposed Project:

- How will this project impact greenhouse gas emissions and air quality in the region? If there are potential impacts, what measures would be put in place to mitigate increased greenhouse gas emissions and impacts?
- What are the long term economic and social impacts on the area from any environmental impacts from such project aspects as intake or effluent contaminants?
- What contaminants are expected to occur in the effluent and what mitigation measures would be in place to reduce their public health impacts?
- What nutritional elements would be removed from the seawater as part of the desalination process and would there be a process to restore them to produce high-quality drinking water that meets or exceeds public health recommendations?
- How have the project designers ensured that the desalination project will not have disproportionate impacts on low-income or ethnic communities?
- Please address nighttime noise levels for plant operations in relation to residential accommodations in the area.
- Please include a traffic analysis and potential impacts in increased access and egress needs to the plant in relation to current and future traffic loads for surrounding roadways.

The County looks forward to reviewing the forthcoming Draft EIR.

Sincerely,

Luke T. Connolly, AICP
Management Specialist