CASTROVILLE COMMUNITY SERVICES DISTRICT

P.O. BOX 1065
OFFICE: 11499 GEIL STREET
CASTROVILLE, CA 95012
FAX (831) 633-3103

24-HOUR TELEPHONE: (831) 633-2560

AGENDA
REGULAR MEETING OF THE BOARD OF DIRECTORS
TUESDAY, AUGUST 17, 2021 – 4:30 P.M.
DISTRICT BOARD ROOM – 11499 GEIL STREET

In compliance with the Americans with Disabilities Act, if special assistance is needed to participate in the Board meeting, please contact Lidia Santos, Board Secretary during regular business hours at (831) 633-2560. Notification received 48 hours before the meeting will enable the District to make reasonable accommodations.

On March 12, 2020, Governor Newsom issued Executive Order N-25-20, which enhances State and Local Governments' ability to respond to COVID-19 Pandemic based on Guidance for Gatherings issued by the California Department of Public Health. The Executive Order specifically allows local legislative bodies to hold meetings via teleconference and to make meetings accessible electronically, in order to protect public health. In light of this, the board meetings of the Castroville CSD Board will be held via GoToMeeting conference. There will be NO physical location of the meeting. The public is strongly encouraged to use the GoToMeeting app for best reception. Due to the current circumstances, there may be limited opportunity to provide verbal comments during the meeting. Persons who wish to address the Board for public comment or on an item on the agenda are encouraged to submit comments in writing to Castroville CSD at **lidia@castrovillecsd.org** by 5:00 p.m. on Monday, August 16, 2021; such comments will be distributed to the Castroville CSD Board before the meeting. Members of the public participating by GoToMeeting are instructed to be on mute during the proceedings and to speak only when public comment is allowed, after requesting and receiving recognition from the Chair. Prior to the meeting, participants should download the GoToMeeting app at: https://global.gotomeeting.com/install/822609133 If you're joining through your smart phone download the GoToMeeting app from your app store. Please join the Castroville CSD Board meeting from your computer, tablet or smartphone. https://www.gotomeeting.com/join/822609133. You can also dial in using your phone. United States: +1 (224) 501-3412. Access Code: 822-609-133.

CALL MEETING TO ORDER

ROLL CALL

PLEDGE OF ALLEGIANCE

ADDITIONS OR CORRECTIONS TO THE AGENDA

PUBLIC COMMENTS – (Limited to three minutes per speaker within the jurisdiction of items not on the agenda. Public will have the opportunity to ask questions or make statements as the Board addresses each agenda item.)

CONSENT CALENDAR:

1. Approve the Draft Minutes of Regular Board Meeting of June 15, 2021 (no board meeting in July 2021) – **motion item**

CORRESPONDENCE:

1. Notice to public drinking water systems from California Water Boards regarding the ongoing dry conditions in California, prepare for drought impacts statewide, water source contingency and conservation planning.
2. Letter of support from Castroville CSD General Manager Eric Tynan for the Central Coast Wetland Group's proposed multi-benefit recreational, water quality and flood plain enhancement project, "Castroville to the Coast".
3. Letter regarding the Carmel River Cease and Desist Order. WRO 2016-0016, Milestone 5 from California American Water to State Water Resources Control Board dated October 21, 2020.
4. Via: Email Monterey County Farm Bureau regarding response to LandWatch of Monterey County letter dated July 19, 2021 to the SVBGSA Board of Directors.
5. Via: Email Monterey One Water General Manager Sciuto to Castroville CSD General Manager Tynan regarding Monterey One Water has developed a new Low-Income Sewer Assistance Program to help qualifying residential customers with their wastewater bill and for Castroville CSD to come alongside and join effort.

INFORMATIONAL ITEMS:

1. *Monterey County Farm Bureau* – Why American Farms Need Immigration Reform
2. *Monterey Herald* – Monterey Peninsula water officials object to Cal Am's 'unfounded accusations'
3. *Monterey Herald* – Monterey water officials told to pay for another Cal Am review
4. RCAC Certificate of Completion, General Manager Eric Tynan for Financial Management and Accounting with QuickBooks online-Part 1 and Part 2
5. *Monterey Herald* – Drought: The end of California's groundwater free-for-all
6. *Monterey Herald* – Monterey Peninsula letter writers blast commission decision
7. *Monterey Herald* – Monterey Peninsula water officials reluctantly agree to pay for buy-out study
8. *Environment* – Without Enough Water To Go Around, Farmers In California Are Exhausting Aquifers

PRESENTATION:

1. None

NEW BUSINESS:

1. Recognize Customer Service Representative Guadalupe Ibarra; employee's long-term service contribution of 20 years to Castroville CSD – **motion item**
2. Letter via email from LandWatch asking for the support of the Castroville CSD Board of Directors to support its request to the Salinas Valley Basin Groundwater Sustainability Agency that, pending completion of a sustainability study for the Deep Aquifers, it impose a moratorium on extractions from new Deep Aquifer wells in the 180/400-Foot Aquifer Subbasin, i.e., wells that were not permitted prior to July 1, 2021 – **motion item**
3. Consider approving proposal for professional engineering services-Emergency Deep Aquifer Supply and Storage Tank Project for $288,747 from MNS Engineers – **motion item**
4. Consider new office hours for Castroville CSD (close for lunch 12:30 p.m.-1:30 p.m. Monday-Friday) – **motion item**

5. New District CCSD decals on all district vehicles and entry signs – Eric Tynan, General Manager
6. Recommend destruction of Well #3 in lieu of feasibility of desalter – **motion item**
7. Discuss restorations and improvements of Castroville downtown overhead sign – Eric Tynan, General Manager
8. Submittal of Castroville CSD's risk and resilience assessment Environmental Protection Agency Certification – Eric Tynan, General Manager
9. Castroville Street Improvements by the County of Monterey Resource Management Agency Department of Public Works – Eric Tynan, General Manager

UNFINISHED BUSINESS:

1. Update on status of grants/projects for Moss Landing-Sewer Zone 3 (Professional Engineering Services for Moss Landing Wastewater System Rehabilitation Project), Castroville-Sewer Zone 1 (Washington Sewer Trunk line Bypass) and Castroville-Water Zone 1(Deep Well #6) for system upgrades and improvements – Eric Tynan, General Manager
2. Update on Well levels – Eric Tynan, General Manager

BOARD OF DIRECTORS COMMUNICATION: When needed, this time is reserved for the Board of Directors to communicate activity, educational classes, and/or Committee reports.

1. Update on Monterey One Water board meeting – Director Ron Stefani and General Manager Eric Tynan
2. Update on the Salinas Valley Basin Groundwater Sustainability Agency – Director Ron Stefani
3. Update on other meetings/educational classes attended by Castroville CSD Directors.

GENERAL OPERATIONS:

1. **General Manager's Report** – Compliance Update, Current Projects Update, Seminars Update, Staff Update, Suggestive Projects Discussions
2. **Operation's Report**
   a) Water – Pumpage & Usage Update, Water Testing Update, Current Installation
   b) Status Update, Current Contractor Work Update, Maintenance/Repair Update, Customer Service Update, Safety Issues
   c) Sewer & Storm Drain – Jetting, Current Installation Status Update, Current Contractor Work Update, Maintenance/Repair Update, Customer Service Update, Safety Issues
3. **Customer/Billing Reports** – A/R Update, Water Sales, Water Usage
4. **Financial Reports** – Treasures Report-L.A.I.F., Quarterly Financial Statements**Internal Report** and Administration Update

CHECK REGISTER – Receive and file the Check Register for the month of June 2021 and July 2021 **– motion item**

ITEMS FOR NEXT MONTHS AGENDA: Tuesday, September 21, 2021 at 4:30 p.m.

CLOSE:

Adjournment to the next regular scheduled Board Meeting – **motion item**

All public records relating to an agenda item on this agenda are available for public inspection at the time the record is distributed to all, or a majority of all, members of the Board. Such records shall be available at the District office located at 11499 Geil Street, Castroville, California.

Certification of Posting

I certify that on August 13, 2021, I posted a copy of the foregoing agenda near the regular meeting place of the Board of Directors of the Castroville Community Services District, said time being at least 72 hours in advance of the meeting of the Board of Directors (Government Code Section 54954.2).

Executed at Castroville, California, on August 13, 2021.

_____

Lidia Santos, Board Secretary

THE OFFICIAL MINUTES OF THE REGULAR BOARD MEETING OF
CASTROVILLE COMMUNITY SERVICES DISTRICT
June 15, 2021

President James Cochran called the meeting to order at 4:30 p.m.

ROLL CALL:
Directors Present (Virtual GoToMeeting): President James Cochran, Director Adriana Melgoza, and Director Ron Stefani
Absent: Vice President Glenn Oania and Director Cosme Padilla
General Manager: Eric Tynan
Secretary to the Board: Lidia Santos
Staff Present:
Guest: District Legal Counsel Christine Kemp and Grant Leonard joined at 4.48 p.m.

PLEDGE OF ALLEGIANCE

The pledge of allegiance was led by General Manager Eric Tynan at the request of President James Cochran.

PUBLIC COMMENTS

1. None.

CONSENT CALENDAR

1. A motion was made by Ron Stefani and seconded by Adriana Melgoza to approve the minutes of the May 11, 2021 Budget & Personnel Committee Meeting and the May 18, 2021 Regularly Scheduled Board Meeting. The motion carried by the following roll call votes:

AYES:	3	Directors: Cochran, Stefani and Melgoza
NOES:	0	Directors:
ABSENT/NOT PARTICIPATING:	2	Directors: Padilla and Oania

Consent Calendar accepted as presented

CORRESPONDENCE:

1. Thank you letter from Castroville CSD General Manager to Carmel Area Wastewater District for the donation of two hazard huts.

Correspondence Calendar accepted as presented

INFORMATIONAL ITEMS:

1. *Associated Press* – Drought in California
2. *California Department of Water Resources* – DWR Releases First Assessments of Initial Groundwater Sustainability Plans
3. *Water Online* – EPA Researchers Develop Tool To Assess Onsite Non-Potable Water Reuse For Buildings Across The U.S.

Informational items accepted as presented

PRESENTATIONS:

1. None

NEW BUSINESS:

1. Implement Water Conservation Stage 2 measures (Castroville CSD customers are asked to follow the stage 2 voluntary water use curtailment). – General Manager Eric Tynan informed the Board given the low amount of rainfall this year and in support of statewide efforts to reduce water use, Castroville CSD customers would be asked to follow Stage 2 voluntary water use curtailment if Board approval is made. Water waste curtailment polices within Stage 2 can be viewed on pages 20-21 of this board packet. Director Ron Stefani along with the other two directors requested to see Water Conservation Stage 3 measures. General Eric Tynan will have Stage 3 measures for their review at next month's board meeting. After some discussion, a motion is made by Ron Stefani and seconded by Adriana Melgoza to approve and implement Water Conservation Stage 2 measures for now. (Castroville CSD customers are asked to follow the stage 2 voluntary water use curtailment). The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

2. Select one of three options for Well #3: destroy well, apply for waiver of secondary constituent or a feasibility of desalter – General Manager Eric Tynan let the Board know that getting a secondary waiver for Well #3 will be very difficult. The community will need to be supportive of the waiver. He is recommending the Board move forward with investigating the feasibility of a desalter. District Legal Counsel Christine Kemp reminded the Board that the District contributed $83,000 to Monterey County Water Resources (MCWRA) for funds to be used specially to destroy Well #3 per the agreement between both agencies. General Manager Eric Tynan stated he will follow up with MCWRA. After some discussion, a motion is made by Ron Stefani and seconded by Adriana Melgoza for General Manager Eric Tynan to investigate the feasibility of a desalter. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

3. Approve "Castroville CSD Investment and Deposit Policy" for fiscal year 2021/2022 – The Board approves this policy annually, which can be viewed on pages 22-26 of the board packet. A motion is made by Adriana Melgoza and seconded by Ron Stefani to approve "Castroville Community Services District Investment and Deposit Policy" for fiscal year 2021/2022. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

4. The Board will take action to designate Eric Tynan, General Manager as labor negotiator for all employees for the District for purpose of (Gov. Code Sec. 54957.6) - After some discussion, a motion is made by Ron Stefani and seconded Adriana Melgoza to designate General Manager Eric Tynan as labor negotiator for all employees for the District for purpose of (Gov. Code Sec. 54957.6). The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

UNFINISHED BUSINESS:

1. Monterey Bay Economic Partnership has partnered with the Central Coast Broadband Consortium and is asking the Castroville CSD if it is open to the concept of considering a subsidized broadband solution for the Castroville area – District Legal Counsel Christine Kemp addressed the Board that the broadband proposal raises a host of issues for the District, including, but not limited to, the cost and time associated with applications to LAFCO and putting forth a proposition 218 measure. The recommendation is the Board of Directors decline the request to participate in, or add the broadband charges on its monthly water bills. General Manager Eric Tynan reiterated to the Board that with limited staff that this concept would not be suitable for the District to provide. In addition, many customers may not want this broadband service and adding this fee to customers water bills will cause problems. Once again, Director Stefani and Cochran agreed with General Manager Eric Tynan on this matter. In addition, the Board was made aware that since the presentation to the Board on May 18, the Monterey County Board of Supervisors, on June 2, 2021, reviewed a proposal from the same group and service provider which included to bring broadband service to qualified homes in Castroville, and other communities. The memorandum from District Legal Counsel Christine Kemp can be viewed on pages 27 & 28 and the broadband concept information from Steve Snodgrass can be viewed on pages 29-31 of this board packet. After some discussion, a motion is made by Ron Stefani and seconded by Adriana Melgoza for Castroville CSD Board of Directors to decline the request to participate in, or add the broadband charges on its monthly water bills. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

2. Notify Monterey County Elections Department if Castroville CSD to remain at-large or move to a by-district method of voting – District Legal Counsel Christine Kemp addressed the Board and if it is the Board's intent is to continue with at-large elections, the District should be prepared to show that their at-large elections do not impair the ability of a protected class to elect candidates or the ability of a protected class to influence the outcome of an election. Facts that could support this are; The District covers small geographical areas; the District has a relatively small number of voters at approximately 3,600 voters; The Castroville area demographic is approximately 89% Latinx; currently, and historically, the District has had Board members from protected classes. In the past the District has had difficulty finding candidates to run for election, with incumbent Board members often running unopposed; By-district elections would further hinder getting interested candidates to run for the Board. For example; if 3 of the current Directors end up in one voting district, 2 of the Board members would not be able to stay on the Board. Recommendations from District Legal Counsel; the Board of Directors, through the General Manager, inform the Monterey County Elections Department that the District is going to remain with an at -large voting method. While the rational and facts support this, should the at-large decision be challenged in the future, the District will need to reevaluate the situation. Memorandum addressed to the Board and election notice can be viewed on pages 32-36 of this board packet. General Manager Eric Tynan recommended the District remain at-large for method of voting. In addition, he would also post the agenda in Moss Landing and Moro Cojo communities to be more transparent. After some discussion, a motion is made by Ron Stefani and seconded by Adriana Melgoza for General Manager Eric Tynan to inform the Monterey County Elections Department that the Castroville CSD is going to remain with an at-large voting method. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

3. Update on status of grants for Moss Landing-Sewer Zone 3, Castroville-Sewer Zone 1 and Castroville-Water Zone 1 for system upgrades and improvements – General Manager Eric Tynan reported to the Board that most of these projects are in the implementation process at this time. The County just signed off on the lot line adjustment for the land purchase for Well #6. Potholing will begin next week for the Washington Sewer Bypass project. Current grants awarded are the Clean Water Small Communities Planning Grant ($500,000) with State Waterboards for administration, preliminary engineering report, plans and specs for sewer in Moss Landing, project assigned to MNS Engineers. The IRWM Implementation Grant ($395,000) is with DWR for the Deep Well (Well #6) and the use will be specified in the DWR/MCRWA agreement. Pending, the DAC Involvement Programs amount TBD with DWR is for the design of the Washington Sewer Bypass for Castroville sewer is also assigned to MNS Engineers. Current funding efforts: Moss Landing sewer system improvements, Castroville emergency well replacement, Castroville water supply improvements and Castroville wastewater improvements.

4. Resolution No. 21-3 Adopting the District Budget for FY 2021/2022 for Water (Castroville Zone 1), Sewer and Governmental (Castroville Zone 1), Sewer and Governmental (Moro Cojo, NMCHS, Monte Del Lago Mobile Park Zone 2) and Sewer (Moss Landing Zone 3) and 5 year CIP.

    - Recommendation of the Budget & Personnel Committee (Directors: Stefani and Melgoza) to consider along with the annual income and operating budget for fiscal year 2021/2022:
        - Extended recreational services with North County Recreation & Park District, $145,000.
        - Three (3%) percent salary increases for all senior District staff and 3.35% Operator II and 3.55% Operator I per Wage Step Program.
        - Capital Improvement Projects

    The Board reviewed and discussed the final budget presented for FY 2021/2022 for Water (Castroville Zone 1), Sewer and Governmental (Castroville Zone 1), Sewer and Governmental (Moro Cojo, NMCHS, Monte Del Lago Mobile Park Zone 2) and Sewer (Moss Landing Zone 3) and capital improvement projects for the fiscal year. Resolution No. 21-3, the District Budgets for FY 2021/2022 and supporting documentation can be viewed on pages 37-64 of the board packet. $145,000 will be allocated for extended recreational services with 45,000 towards capital improvement projects for the recreation center ($20,000 is being carried forward from fiscal year 2020/2021 due to the delay of projects caused by the Covid-19 pandemic), and a 3% percent hourly/salary increases for all senior District staff and 3.35% Operator II and 3.55% Operator 1 who will be moved up to Operator II. As per the approved Wage Step Program-Board Approved October 2018, salary increases will be effective July 1, 2021. North County Recreation & Park District Director Grant Leonard thanked the Board for being committed to extended recreational services and being a great partner. After further discussion, a motion is made by Adriana Melgoza and seconded by Ron Stefani to approve Resolution No. 21-3 Adopting the District Budget for FY 2021/2022 for Water (Castroville Zone 1); Sewer and Governmental (Castroville Zone 1); Sewer and Governmental (Moro Cojo, NMCHS, Monte Del Lago Mobile Park Zone 2) and Sewer (Moss Landing Zone 3); and a 3% percent salary increase for all senior District staff, 3.35% Operator II and 3.55% Operator moved up to Operator II. Salary increases will be effective July 1, 2021. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

CLOSED SESSION: 5:12 p.m.

1. Pursuant to Government Code Section. 54957, Public Employee Performance Evaluation, Title: General Manager

ANNOUNCEMENT OF CLOSED SESSION ITEM: (if applicable):
The board will reconvene into open session prior to adjournment and shall announce any action taken during the closed session. **The Board returned from Closed Session at 5:18 p.m.**
The Board conducted a performance evaluation of the General Manager and the employment agreement was reviewed. Any action will be taking out in open session.

NEW BUSINESS CONTINUED:

6. Consider approving a three year Employment Agreement for the Board appointee: General Manager Eric Tynan as it is due to expire as of June 30, 2021 – The Board reviewed the three year Employment Agreement. A motion is made by Adriana Melgoza and seconded by Ron Stefani to approve a three year Employment Agreement for the Board appointee, General Manager Eric Tynan with a 3% percent salary wage increase, effective July 1, 2021. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

BOARD OF DIRECTORS COMMUNICATION: When needed, this time is reserved for the Board of Directors to communicate activity, educational classes, and/or Committee reports.

1. Update on Monterey One Water (M1W) board meeting – Director Ron Stefani reported to the Board that on June 7, 2021 MIW held its public hearing regarding the proposed rate increases. They had over 100 attendees. Although, most of the public attending opposed the rate increases, the MIW Board still voted to approve the rate increase which will be effective as of July 1, 2021. Cal Am agreed to contribute 2 million towards the Pure Water Expansion project.

2. Update on Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) meeting – Director Ron Stefani let the Board know that the latest big news is that the GSA has approved the 100/400 basin plan. They are now working on implementing the plan.

3. Update on meetings or educational classes attended by the Directors –None to report at this.

GENERAL OPERATIONS

1. General Manager's Report – Compliance update, current projects update, meetings/seminars update, staff update, suggestive projects discussions
2. Operation's Report
   a) Water – Pumpage & Usage Update, Water Testing Update, Current Installation
   b) Water -Status Update, Current Contractor Work Update, Maintenance/Repair Update, Customer Service Update, Safety Issue
   c) Sewer & Storm Drain – Jetting, Current Installation Status Update, Current Contractor Work Update, Maintenance/Repair Update, Customer Service Update, Safety Issues
3. Customer /Billing Reports – Water Sales, Water Usage, A/R Update, Customer Service Update
4. Financial Reports – Treasures L.A.I.F. Report, Internal Report, Administration Update

General Operations Reports were accepted as presented

CHECK LIST – May 2021. A motion was made by Adriana Melgoza and seconded by Ron Stefani to pay all bills presented. The motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

There being no further business, a motion was made by Adriana Melgoza and seconded by Ron Stefani to adjourn to the next scheduled Board meeting; the motion carried by the following roll call votes:

AYES:	3	Directors:	Cochran, Stefani and Melgoza
NOES:	0	Directors:	
ABSENT/NOT PARTICIPATING:	2	Directors:	Padilla and Oania

The meeting adjourned at 5:50 p.m. until the next scheduled meeting

Respectfully submitted by,

Lidia Santos
Secretary to the Board

Approved by,

James Cochran
President

Notice to Public Drinking Water Systems

Ongoing Dry Conditions in California – Prepare for Drought Impacts Statewide

Water Source Contingency and Conservation Planning

June 8th, 2021

With California experiencing its second consecutive dry year, and due to the effects of climate change, we are all reminded that drought planning and conservation are now a California way of life.

The first six months of water year 2021 rank as the fourth driest on record. With warm temperatures and extended dry conditions, melting Sierra Nevada snow is soaking into parched ground rather than running into reservoirs. On some streams, runoff is lower now than during the critically dry year of 2014–15.

These conditions may contribute to reduced yield from your ground and/or surface water supply sources, challenges with water quality, and difficulties in meeting normal system demands resulting in water shortages or low pressure during peak demand periods, such as those that normally occur in the late summer and early fall months.

Sustained preparation and planning are critical. Most of California's water systems were able to manage drought impacts and maintain the high quality of water delivered to their customers during the last drought by taking actions early.

The State Water Resources Control Board urges you to prioritize three actions: 1) closely evaluate your water supply; 2) develop a contingency plan to mitigate any water supply problems that might result from current and future conditions, and 3) encourage your customers to conserve water voluntarily. The following components should be included in your system evaluation and drought contingency plan:

Evaluate Your Water Supply

An accurate determination of the system source capacity, including ground water levels, well yields, well-pumping capacities and pump bowl settings (depth to the pump's intake). The information you collect should include the following:

a. **Monitor the depth-to-ground-water level in your wells under both pumping and non-pumping conditions:** Depth-to-groundwater is a very good indicator of well capacity. Too often, a well's pumping capacity is used as the sole indicator of pumping conditions with no attention given to ground water depth. As a result, depletion of the ground water table over time may not be apparent. In addition, not monitoring groundwater levels over pump bowls can ruin good pumping equipment if excessive drawdown in the groundwater table allows air to enter the pumping equipment. **If water levels drop below your pump bowl settings, significant damage to pump impellors, bearings and motors is likely to occur. As a result, your system could be without water until a new pump can be installed, and you might encounter significant equipment and labor costs to replace burned-out pumps and motors.**

b. **Read and record well pumping capacity**: We *strongly* recommend that you read and record your well flow totalizing meter on a regular basis. This can help you monitor usage and identify your degree of water loss or "unaccounted-for-water." Unaccounted-for-water is the difference between the water you produce from your sources and the amount actually delivered to customers.

c. **Monitor and record the water levels in your system storage tanks during various high-demand periods of the day**: We recommend that you monitor and record the level of the water in your storage tanks at the same time each day, which will help you identify increasing system demand or reduced source capacity conditions that can lead to major supply problems.

d. **Repair any obvious leaks in your storage tanks and distribution system.** If your distribution system is over 25 years old, consider starting a leak detection program to identify and repair leaks in your distribution system that may not be obvious, particularly unaccounted-for-water losses. Water that is not wasted through unrepaired leaks will be available to customers when needed. It will also save you money, because you will consume less power for pumping water that will ultimately be wasted anyway.

Create a Contingency Plan

To start your drought contingency plan, review your past water use data and anticipate upcoming demand. Then, plan appropriately for anticipated shortages. Minimally, your plan should include:

a. **Serious water conservation measures that will help mitigate water shortage problems**: If your system has experienced water shortages in prior years, and additional source capacity has not been brought online, it is imperative to begin conservation efforts immediately. Outdoor watering, and other non-essential water use should be curtailed.

b. **A temporary or permanent interconnection to a neighboring utility that has excess production capacity**: Such interconnections should be discussed with the appropriate Division of Drinking Water District office before implemented. Arrangements for an interconnection should be made ahead of an emergency, so now is the time to plan one if appropriate.

c. **Installation of treatment on standby sources that have water quality issues**: If you anticipate that you will need to treat standby sources to maintain drinking water quality standards, begin the planning and permitting process now and install the necessary equipment as soon as possible. Treatment equipment and constructional materials are already in tight supply and may not be available later to cover an emergency installation. Some treatment requires testing before it can come online, and this should be considered in your planning timeline.

d. **Join a Mutual Aid & Assistance Program**: Belonging to mutual aid associations, such as California Water/Wastewater Agency Response Network (CalWARN), will give you access to information on topics like emergency preparedness, disaster response, and mutual assistance processes for public and private water and wastewater utilities. Benefits include a mutual assistance agreement, process for sharing emergency resources among signatories statewide, and resources to respond and recover more quickly from a disaster or drought.

It is important that even for systems that use groundwater wells that have never experienced an outage, you take steps to verify water table depth and well pump settings as indicated above. If you believe your water system will be facing water shortage problems, we recommend you contact your district office to alert them and work through the steps needed to remain in compliance.

Create awareness that voluntary conservation is critical

Conservation extends existing supplies, helping to ensure California's communities and ecosystems weather this crisis. The State Water Board urges you to work with all customers in your service area to voluntarily reduce:

a. Watering of outdoor landscapes that causes incidental runoff onto adjacent property, non-irrigated areas, private and public walkways, roadways, parking lots, or structures.

b. Individuals washing privately-owned cars with a hose, unless they are using a positive action shut-off nozzle.

c. Applying potable water directly to driveways and sidewalks.

d. Using potable water in an ornamental fountain or other decorative water feature.

e. Using water to irrigate turf and ornamental landscapes during and within 48 hours after measurable rainfall.
f. Serving drinking water that was not requested in eating or drinking establishments.

g. Irrigating turf on public street medians or publicly owned and/or maintained landscaped areas between the street and sidewalk.

The State Water Board also encourages you to coordinate with:

a. Hotels and motels to ensure they allow guests to opt out of having towels and linens laundered daily.

b. Homeowners' associations, community service organizations, or similar entities to ensure they support water-efficient landscaping.

For more information about water supply planning, water conservation, drought-related events, and more, visit the Water Board's new drought webpages. They include a new visualization tool that allows you to explore water system supplies and demands. The water conservation portal offers water-saving tips and suggested conservation measures, references to policies and laws, and more resources. These pages will be continuously updated so check back regularly.

Thank you for your continued partnership in ensuring Californians have access to high quality water. Together, we can make every drop count.

CASTROVILLE COMMUNITY SERVICES DISTRICT

P.O. BOX 1065
OFFICE: 11499 GEIL STREET
CASTROVILLE, CA 95012
FAX (831) 633-3103

24-HOUR TELEPHONE: (831) 633-2560

June 24,2021

California Ocean Protection Council
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

RE: Proposition One - Coastal Environmental Justice Solicitation

Dear Chair and Grant Review Committee members:

I am writing to express strong support for the Central Coast Wetland Group's (CCWG) proposed multi-benefit recreational, water quality and flood plain enhancement project, "Castroville to the Coast". The Castroville Community Services District is committed to supporting this effort.

Castroville is an underserved and severely disadvantaged community within unincorporated northern Monterey County. Castroville is known as the "Artichoke Capital of the World" and has been a gateway community for migrants from its inception in 1882. The community faces a number of environmental challenges that Castroville to the Coast project will rectify. The community is at the northern end of the Salinas River Valley and receives stormwater flows from much of the Salinas Valley including the City of Salinas. These winter flows have led to periodic flooding within the community and adjacent farm land. In the summer, flows from agricultural runoff and the poor condition of the slough/reclamation ditch have created a polluted, degraded waterbody directly next to the community, thus posing a blight on an otherwise historic and vibrant community. Citizens of the community are denied the open spaces and natural resources of Monterey Bay and its coastal estuaries due to private lands and Highway 1 which isolate Castroville pedestrians from the coast and the adjacent community of Moss Landing and its harbor.

The proposed Castroville to the Coast project will design a pedestrian bike path and floodplain restoration along the Tembladero Slough that will increase the area of the channel, create a shallow floodplain marsh habitat and increase stability of channel banks, all needed to reduce flooding and improve water quality, creek and wetland habitat, and coastal access.

The project will work with farmers to retire frequently flooded crop land to expand the width of the slough along the approximately three mile reach between the community of Castroville and the Salinas River State Beach to increase flow capacity as prescribed in the Salinas Valley Stormwater Resources Plan (2019).

The Castroville Community Services District looks forward to collaborating in the planning and implementation of this important recreation, water quality and drainage project.

In addition; the Castroville Community Services District supports CCWG in finding the critically needed resources to permit, construct and operate this improved watershed drainage system.

Sincerely,

James Eric Tynan
General Manager

CALIFORNIA
AMERICAN WATER

Richard Svindland
President
California American Water
655 W Broadway, Suite 1410
San Diego, CA 92101
www.calamwater.com

P 619-446-4761
F 619-230-1096

October 21, 2020

UPS OVERNIGHT & EMAIL

Eileen Sobeck, Executive Director
State Water Resources Control Board
1001 I Street
PO Box 100
Sacramento, CA 95812

Re: **Carmel River Cease and Desist Order, WRO 2016-0016, Milestone 5**

Dear Ms. Sobeck:

This letter provides an update on California American Water Company's (Cal-Am) Annual Report regarding compliance with State Water Board WRO 2016-0016 (CDO) milestones. The Annual Report was submitted June 4, 2020 by letter from Chris Cook to Erik Ekdahl. As was predicted in June, CDO Milestone 5 was not met on September 30, 2020. Milestone 5 requires the following activities by September 30, 2020:

> (1) Drilling activity for at least one MPWSP Desalination Plan source water production well complete; (2) foundation and structural framing complete for MPWSP Desalination Plant pretreatment seawater reverse osmosis, and administration buildings at desalination plant; (3) excavation complete for MPWSP Desalination Plant brine and backwater storage basins; and (4) 25% MPWSP Desalination Plant transmission pipelines installed based on total length, including 100% installation of the "Monterey Pipeline and other ASR related improvements". (CDO Sect. 3.b.v., p. 21).

As provided in section 3.b.vi of the CDO, the consequence of a missed milestone is a reduction of 1,000 acre-feet of the Effective Diversion Limit, thereby reducing Cal-Am's Carmel diversion limit to 7,310 acre-feet in Water Year 2020-2021.

Progress towards Milestone 5

As explained in the Annual Report (Attachment 1), numerous circumstances beyond Cal-Am's control resulted in delays to the construction activities required in Milestone 5. First, in June 2018, Cal-Am timely submitted a Coastal Development Permit application for the Monterey Peninsula Water Supply Project (MWPSP) supported by the extensive environmental and technical analyses developed before the California Public Utilities Commission. On October 28, 2019, the California Coastal Commission staff released a partial staff report recommending

denial of the Coastal Development Permit. On November 4, 2019, Coastal Commission staff released an addendum to the staff report, stating that, among other things, additional groundwater modeling was needed to determine whether the project would deplete groundwater supplies. The Coastal Commission therefore decided to open a hearing on Cal-Am's application on November 14, 2019, but continued the hearing to a later date.

On January 28, 2020 Coastal Commission staff requested that Cal-Am withdraw its Coastal Development Permit application to allow time for more studies. Cal-Am declined to withdraw the application, opposing any additional delay. Cal-Am and many other parties also questioned the need for the additional groundwater analyses requested by Coastal Commission staff in light of the extensive record that had been created before the CPUC on the same issues. The SWRCB submitted a letter dated May 8, 2020 that raised similar questions about the need for the additional studies. Nevertheless, Cal-Am agreed to a short extension of the application deadlines to allow time to complete additional independent analyses of the issues raised by Coastal Commission staff. Time was further extended in response to the COVID-19 pandemic.

The Annual Report also noted the October 2019 order issued by the Monterey County Superior Court staying construction activities contemplated in Milestone 5. The stay order was in response to a Marina Coast Water District challenge to Monterey County's issuance of a development permit needed to begin construction on the desalination plant. Both the Coastal Development Permit and County development permit are necessary to begin the construction activities required in CDO Milestone 5.

Circumstances Resulting in Missed Milestone 5

There have been several developments since Cal-Am submitted the Annual Report in June 2020. The Coastal Commission scheduled Cal-Am's continued hearing for a special meeting on September 17, 2020, but on August 25, 2020, released a staff report again recommending denial of the project. Unfortunately, the Coastal Commission staff report did not provide any means for the Commissioners to independently consider the factual record and take any action other than denial of the application. Facing a risk of possible Commission denial, Cal-Am elected to withdraw its application on September 17, 2020. Cal-Am intends to refile the Coastal Development Permit application in the coming weeks and will use the intervening period to explore opportunities to address certain environmental justice concerns raised by the City of Marina. Thus, on September 25, 2020, Cal-Am sent a letter to the City asking if the City would meet with Cal-Am to discuss the City's concerns with the project, and explore possible options that could be mutually beneficial to the City, Cal-Am, and the region as a whole. The City responded on October 6, 2020, that it was amenable to opening a dialogue to address concerns of the City and its stakeholders. Upon receiving the City's letter, Cal-Am reached out to arrange next steps, and is awaiting the City's response.

Cal-Am has done everything within its control to develop and permit the MPWSP as required in the CDO, with the goal of eliminating unauthorized diversions from the Carmel River and, ultimately, extinguishing the CDO. For example, Cal-Am worked with a broad coalition of stakeholders to integrate the Pure Water Monterey project into the MPWSP in 2016, which resulted in a downsized desalination plant and source water intake system. Cal-Am has also diligently pursued project approvals and construction of project components to meet the CDO Milestones:

- CDO Milestone 1: Cal-Am achieved Milestone 1 on September 22, 2016 when the CPUC issued Decision 16-09-021, providing its approval to (1) enter into a Water Purchase Agreement with Monterey One Water and (2) construct various facilities (pipelines and pump stations) necessary to allow the Pure Water Monterey to proceed.
- CDO Milestone 2: Cal-Am achieved Milestone 2 in 2016, commencing construction of the Monterey pipeline and pump station project as part of the Pure Water Monterey project in October 2016, and commencing installation of the 36-inch pipeline on January 3, 2017.
- CDO Milestone 3: Cal-Am achieved Milestone 3 on September 13, 2018, when the CPUC issued Decision 18-09-017 certifying the MPWSP Final Environmental Impact Report and issuing a Certificate of Public Convenience and Necessity to construct the MPWSP 6.4 mgd desalination project. In 2018 and 2019 Cal-Am and the CPUC successfully defended all legal challenges to the CPUC's decision.
- CDO Milestone 4: Following issuance of regulatory permits and authorizations to begin work, Cal-Am achieved Milestone 4 on September 16, 2019 by commencing construction on the Desalination Transfer Pipeline project for installation of over 2,500 linear feet of pipeline.
- CDO Milestone 5: Cal Am was on track to achieve Milestone 5 when in October 2019 the superior court issued a stay on all physical activities at the desalination plant site pending the Coastal Commission's determination about the project slant wells. Since October 2019 when Coastal Commission staff released its report recommending denial of the Coastal Development Permit, Cal-Am has repeatedly attempted to work with Coastal Commission staff to resolve its concerns with the project, including submission of a detailed Habitat Mitigation and Monitoring Plan for the Cemex site, an analysis of local vernal ponds and an Adaptive Management Program to address any potential impacts, a plan for lining of the Monterey One Water outfall, reports on the adequacy of water supplies to meet customer demand, and an analysis of project impacts on disadvantaged communities.

While Cal-Am firmly believes that the circumstances that resulted in missing Milestone 5 are beyond Cal-Am's control, we understand that it is less clear whether the actions of other CDO "Applicants" contributed to the missed Milestone.[1] Specifically, the Monterey Peninsula Water Management District (MPWMD), one of the early proponents of the MPWSP and an Applicant when the SWRCB amended and extended the CDO in 2016, has now become a staunch opponent of the Project, reversing its position despite being a party to multiple settlement agreements concerning the Project, which agreements had been relied upon by multiple parties. MPWMD submitted correspondence to the Coastal Commission that has undermined and delayed the Coastal Commission's review and consideration of the MPWSP Coastal Development Permit application, including continued advocacy of a misleading water supply and demand analysis that was specifically rejected by the CPUC, submitting a deliberately manipulated consultant's memorandum to make it appear to support MPWMD's analysis, and

[1] The CDO directs several actions at the "Applicants" that jointly petitioned the SWRCB in 2016 to modify the prior CDO. The Applicants include Cal-Am, the Monterey Peninsula Regional Water Authority, the Monterey Peninsula Water Management District, the City of Pacific Grove, and the Pebble Beach Company. Section 3.b.viii. of the CDO requires a SWRCB finding that the cause for a missed Milestone is beyond the control of the Applicants, collectively, before the SWRCB may grant relief from EDL reductions for a missed milestone.

arguing instead for its own alternative water supply project (Pure Water Monterey expansion). In a June 15, 2020 letter to Coastal Commission executive director Ainsworth, MPWMD expressly asked the Coastal Commission to reject Cal-Am's application for the MPWSP.[2] Coastal Commission staff relied heavily on MPWMD's actions and the misleading information provided by MPWMD staff in the Coastal Commission staff's analysis of the MPWSP and recommendation to deny the Coastal Development Permit application.

The problem with MPWMD's position is that it will not produce an adequate, reliable and permanent long-term water supply for the Monterey Peninsula, which is required to lift the CDO and pull the Monterey Peninsula out of its perpetual state of water poverty and temporary fixes. MPWMD's positions will force the Monterey Peninsula to continue to rely on the Carmel River and Seaside Groundwater Basin indefinitely as the backstop to water supply and demand variability.

Perhaps more importantly, MPWMD appears willing to risk the Carmel River's recovery and the Monterey Peninsula's last and most critical water supply resource, the Seaside Groundwater Basin. For example, earlier this year, given the likelihood that an alternate water supply would not be completed by the end of 2021, the MPWMD Board was presented with a plan for an additional pipeline to maximize use of Aquifer Storage and Recovery (ASR) and Pure Water Monterey water supplies and minimize Carmel River diversions. The new pipeline would allow simultaneous injection of ASR and extraction of Pure Water Monterey from the Seaside Groundwater Basin. But opponents of the desalination plant objected to the new pipeline, claiming it also could support the desalination project. And so far, the MPWMD Board has delayed consideration of the pipeline, instructing staff to explore an alternative that, as noted by MPWMD staff, would necessitate intensification of pumping on the Carmel River in the summer months when Cal-Am is trying to reduce pumping to benefit the fishery. MPWMD's preferred alternative also does not account for critical protections for the Seaside Groundwater Basin. As the Seaside Basin Watermaster recently explained to Coastal Commission staff, without the volume of water to be provided by the MPWSP, the Seaside Groundwater Basin is in serious jeopardy of overdraft and seawater intrusion, conditions that would be catastrophic to both the communities' ASR and the Pure Water Monterey project, not to mention native groundwater supplies in the Basin. (See Attachment 2). This is a very short-sighted and dangerous game that the MPWMD is playing with the Monterey Peninsula's water supplies and resources. Rather than protecting and enhancing the region's water supplies and resources, as it is charged to do, MPWMD's actions appear to be designed to defeat the MPWSP at all cost.

Cal-Am understands that the primary function of the CDO milestones is to ensure that the MPWSP is diligently pursued and that the community understands the importance of reducing Carmel River diversions to authorized limits without delay. Cal-Am has at all times diligently pursued the MPWSP, and aggressively opposed all attempts to delay the project. Cal-Am continues to believe that the MPWSP is the only permanent and sufficient solution to the water

[2] We should emphasize that the water supply and demand analysis advanced by the MPMWD was rejected by the California Public Utilities Commission (CPUC), and that the Pure Water Monterey Expansion Project was rejected by Monterey One Water Board in August 2020 and has been aggressively opposed by the County, Monterey County Water Resources Agency, City of Salinas, and agricultural water users in the Salinas Valley. Moreover, as you are well aware, the Pure Water Monterey project itself has encountered significant delays and technical issues that affect both the timing and overall viability of that project.

supply shortage on the Monterey Peninsula. But given MPWMD's complicity in the events resulting in missing Milestone 5, we understand that the State Water Board is not likely to find that delays were beyond the control of the "Applicants." Accordingly, Cal-Am is preparing its Water Year 2020-2021 operations plan with the expectation that the Effective Diversion Limit under the CDO is reduced from 8,310 acre-feet to 7,310 acre-feet. In order to comply with the CDO and meet customer water demands in WY 2020-21, Cal-Am intends to rely on continued water conservation, continuation of the existing moratorium, optimizing water supplies, and carry-over credits under the CDO. Cal-Am is optimistic that the Monterey Peninsula's water demands can be met without additional rationing in Water Year 2020-2021.

Cal-Am would like to set up a meeting with you and your staff in the next few week to discuss Cal-Am's Water Year 2020-2021 operations in light of missed Milestone 5. At the meeting we also should begin discussions about how Cal-Am will manage water supplies next year in light of the likelihood that remaining CDO milestones will be missed. I will follow up with you this week to set a meeting.

Sincerely,

Richard Svindland

cc: Erik Ekdahl (via email)
Steve Westhoff (via email)

Farm Bureau Monterey

1140 Abbott St., Ste. C, Salinas CA 93901
P.O. Box 1449, Salinas CA 93902-1449
831-751-3100 www.montereycfb.com

July 21, 2021

Salinas Valley Basin Groundwater Sustainability Agency
Att: Chair Pereira and Executive Committee
P.O. Box 1350
Carmel Valley, CA 93924

VIA: E-mail to board@svbgsa.org

RE: RESPONSE to LandWatch of Monterey County letter dated July 19, 2021

Dear Chair Pereira and Executive Committee Members:

The recent letter received from Attorney John Farrow, representing LandWatch of Monterey County, makes assumptions about, and mischaracterizes, the motion that came before the SVBGSA Advisory Committee at their meeting on July 15th.

In the spirit of cooperatively working together on solutions that work for all stakeholders in the Salinas Valley Groundwater Basin, I offer these comments to clarify the inconsistencies that might be drawn from Mr. Farrow's assertions.

When making a motion in any particular meeting or forum, it is up to the maker of the motion to adequately describe the motion to ensure that clarity is achieved by all who are voting upon that motion; as was in this case, the motion made was clear to all who voted in favor and the intent of the motion was not to initiate any actions beyond what the motion stated.

For reference, the language of the motion made by myself, as an Advisory Committee member, was:

> **By consensus of this Advisory Committee: recommend that the SVBGSA Board of Directors direct staff and consultants to review the issues related to extractions from the deep water aquifers and the implementation of the groundwater sustainability plan for the 180/400 sub-basin aquifer, to provide more information and appropriate recommendations to the Advisory Committee and the Board of Directors, and request agency legal counsel to provide advice regarding the authority of the SVBGSA to implement any of the plan recommendations, including the authority of the SVBGSA to manage or restrict groundwater extractions in any specific area or aquifer, and the relationship of that authority to the reasonable and beneficial uses of groundwater. SVBGSA will continue to initiate the Deep Aquifer Study in an expeditious manner.**

Mr. Farrow asserts that the motion be interpreted as "to determine not *whether* but *how* to restrict pumping if that is independently found to be necessary as a result of the Deep Aquifer Study." (emphasis from the original language).[1]

The intent of the motion, as noted during the meeting, was for SVBGSA Staff, in consultation with their legal counsel, to determine if there is precedent and authority within SGMA for recommending any extraction limitations or prohibition PRIOR to a deep aquifer study that evaluates and determines water quantity, extent of the aquifer resources, and how extractions are impacting the groundwater levels in that strata layer.

The motion was <u>not</u> intended to order SVBGSA Staff or legal counsel to determine HOW this should be accomplished until that study is finalized and accepted by the SVBGSA Board of Directors. The Deep Aquifer Study will provide a scientific basis that will help determine WHETHER there is a need to make any management practice recommendations or extraction limitations related to either new or existing wells in that specific aquifer. Because the deep aquifer is the only water resource available to parcels impacted by unusable upper aquifer layers, it is imperative that the science lead to any and all determinations related to groundwater extractions.

It should also be noted that the failure of the County Board of Supervisors to extend the now-expired well ordinance does not provide a motivating compulsion on the part of SVBGSA to do so as a proxy, as the completion of the study is predicated first, as indicated in the 180/400 groundwater sustainability plan.

Interpretation of the motion made before the Advisory Committee, and passed by a majority of those present, should be made in the context of what was offered and discussed: as a pause to discover and further disseminate information of imposing any extraction limitations PRIOR to and absent a scientific study that provides the necessary information related to the setting of specific undesirable results and minimum thresholds for that deep aquifer.

To make that leap now, suggesting that the motion language suggests pumping extraction limitations or prohibitions should be decided before realizing this solid informational knowledge base is unwise and out of chronological order.

Your consideration for the true intent of the Advisory Committee motion made and passed is greatly appreciated.

Sincerely,

Norman C. Groot
Executive Director

[1] John Farrow, M.R. Wolfe & Associates, P.C.: "July 22 Agenda Item 4b; implementing the July 15 Advisory Committee motion regarding restrictions on Deep Aquifer groundwater extractions" dated July 19, 2021.

From: Paul Sciuto <Paul@my1water.org>
Sent: Friday, July 30, 2021 12:43 PM
To: Eric Tynan <eric@castrovillecsd.org>
Cc: Ron Stefani <rjstefani@aol.com>; Mike McCullough <MikeM@my1water.org>
Subject: New M1W Customer Assistance Program

Dear Eric,

We recognize customers may face circumstances that stretch their financial resources. In response, Monterey One Water has developed a new Low-Income Sewer Assistance Program to help qualifying residential customers with their wastewater bill. Enrolled customers will receive a credit for one bi-monthly billing cycle for Monterey One Water's wastewater treatment fee only. This credit will be available to eligible customers at least once every two years, depending on the availability of funds. Qualification for this program is income dependent and will use enrollment in the PG&E CARE utility assistance program as eligibility verification.

Help Support Our Community
As sewer system management is a joint responsibility in our region, I'm writing to request the Castroville Community Services District come alongside Monterey One Water and join this effort. With your support, the credit for Moss Landing residents would increase to include your collection fee charge. In 2020-21, your bi-monthly collection charge, representing two months of service, was $88.50.

This program is set to go into effect this September 2021. For the inaugural year, the M1W Board has budgeted $75,000, which would help 1,000 customers throughout our service area with the wastewater treatment portion of their sewer bills.

If the Castroville Community Services District is interested in learning more about the program and allocating funding to this program for Moss Landing residents, please contact Mike McCullough, Director of External Affairs at mikem@my1water.org. We value our partnership and hope we can find more ways to work together in supporting our community.

Thank you,
Paul

Paul A. Sciuto, P.E.

General Manager

Monterey One Water

5 Harris Court, Building D

Monterey, CA 93940

[redacted]

[redacted]

www.MontereyOneWater.org

Why American Farms Need Immigation Reform

WRITTEN BY: DANILO ZAK FOR *THE HILL - OPINION*

Among the many essential workers who have kept America running through the coronavirus pandemic are the nation's three million farmworkers. In March 2020, the Department of Homeland Security sent many of them certificates to carry on the job, declaring them "essential critical infrastructure workers." We need you, the agency said.

By one estimate, around 70 percent of U.S. farmworkers are undocumented. This puts them in a much more precarious position than other essential workers. Despite working on the pandemic's frontlines, many of our undocumented farmworkers still lack access to basic medical coverage due to their immigration status. Even though they pay taxes, most have also been denied government stimulus checks. On top of that, these workers must live in constant fear of immigration officials.

The American agriculture industry relies on undocumented workers to put food on our tables. They are stepping up for us, but our immigration system isn't stepping up for them. We need Congress to make it right by passing farmworker reform that encourages new immigrant workers while providing a pathway to citizenship for the undocumented workers in our fields today. In March, the House passed legislation that would achieve those goals, with support from both sides of the aisle and from constituencies representing both farmworkers and growers.

In the ag sector, immigration reform isn't a partisan issue – it's an undisputed necessity.

Immigrant workers have always been a huge part of the American agriculture industry. Even before the pandemic, the native-born agricultural workforce was shrinking, exacerbating a severe labor

CONTINUES ON PAGE 16 →

Why American Farms Need Immigration Reform

← CONTINUED FROM PAGE 15

shortage that has long impeded American farms. More than 40 percent of farmers say they are unable to obtain the necessary workers to produce their main crops.

Desperate for good workers, farmers have raised wages and sought new ways to advertise openings. But these are not easy openings to fill. Work on America's farms requires a combination of grit, skill and experience. It means rising early and leaving the fields late; picking, sorting and packing harvested produce; and operating difficult machinery outdoors in any and all weather conditions. Those who stay often need to have a history with the job and with the soil.

Most Americans are not willing or able to take on these jobs. In 2010, with U.S. unemployment near 10 percent, a 25-year high, United Farm Workers' "Take Our Jobs" campaign offered 1.8 million farming jobs to unemployed Americans. Only seven American workers stayed on after a few weeks of work in the fields.

With Americans unwilling to work on the farm, many growers have naturally turned to our legal immigration system. But that system isn't providing effective solutions to the agricultural worker shortage.

The temporary H-2A agricultural guest worker program has created an increasingly cumbersome, outdated and expensive process for farmers that cuts into already slim margins. Some crucial farming industries, such as dairy, have year-round labor needs and are cut out from the H-2A process entirely. Due to these limitations, less than 10 percent of all U.S. farmworkers are on H-2A visas.

Without much help from the legal immigration system, some farmers have even turned to mechanization in an effort to relieve their worker shortage. But farming innovation does not always come hand-in-hand with a reduction in workforce needs. In the 21st century, farm labor demand has remained steady – or even increased – even as technological advancement on the farm continues.

Given the severity of the agricultural worker shortage, and the lack of effective solutions, it is no wonder that the American agriculture industry has come to rely heavily on workers who lack immigration status.

These workers contribute nearly $9 billion a year to the fruit and vegetable sector alone. The majority have lived in the U.S. for over a decade, working the same farm for years, building expertise and growing roots in the community.

Yet because they lack legal immigration status, these essential workers and their families are constantly at risk. During a single immigration enforcement raid in Norwalk, Ohio, 90 children were separated from their farmworker parents. A local nursery in Norwalk lost 40 percent of its workforce. That same year, Ohio announced a crisis-level agricultural labor shortage.

That's why we need immigration reform now. Growers need a better legal immigration system to acquire new workers, and undocumented farmworkers need the security and stability that a pathway to citizenship can bring.

But there are signs of hope. On March 18, the House of Representatives passed a bipartisan bill that includes the three platforms reform will need: legalization and a pathway to citizenship for undocumented workers, H-2A reform, and, once the system works again, a means of enforcement. After Easter, the Senate has a new opportunity to take up the bill and pass meaningful immigration reform in the agriculture sector.

A sparse, uncertain and fragile agricultural workforce puts us all at risk. As Congress continues to plan America's economic recovery from the COVID-19 pandemic, it's time we put effective immigration and farmworker reform back on the table. Congress must take immediate action to step up for farmworkers, support our nation's farms and pass needed immigration reforms.

DANILO ZAK IS A SENIOR POLICY AND ADVOCACY ASSOCIATE AT THE NATIONAL IMMIGRATION FORUM. FOLLOW HIM ON TWITTER @DANILOZAK.

Monterey Peninsula water officials object to Cal Am's 'unfounded accusations'

By DENNIS L. TAYLOR | dtaylor@montereyherald.com | Monterey Herald
PUBLISHED: June 23, 2021 at 1:38 p.m. | UPDATED: June 23, 2021 at 1:40 p.m.

MONTEREY — The board of the Monterey Peninsula Water Management District approved a letter to state water officials Tuesday that is a stinging rebuke of what they say is California American Water Company's attempt to blame the district for Cal Am's failure to meet required milestones in its proposed desalination project.

Information supplied to the State Water Resources Control Board is important to the entire Monterey Peninsula because it will take that information and data and use it to make decisions affecting the water availability to the Monterey Peninsula.

In part, the issue concerns a letter written on Dec. 28 by water district General Manager David Stoldt to Eileen Sobeck, the executive director of the State Water Resources Control Board, whose agency is charged with enforcing a 2009 cease-and-desist order on over-pumping of the Carmel River aquifer.

In the December letter that was supported by the water district's board of directors, Stoldt "repudiated Cal Am's unfounded accusations which erroneously attempted to cast fault on the district for Cal Am's failure to meet its required Milestone 5."

Milestone 5 is a requirement that Cal Am show progress on certain construction elements of its proposed desalination facility. The project stalled when Cal Am withdrew its desal project from the state Coastal Commission when the agency twice deemed the application incomplete.

In the October letter from Cal Am to the Water Board, the company explained the reasons Milestone 5 was missed, including court action that stayed all physical activities on the project. But it took direct aim at the Water District, saying it has become a "staunch opponent" of the desal project.

"The (Water District) submitted correspondence to the Coastal Commission that has undermined and delayed the Coastal Commission's review of ... the permit application," the letter states. The Water District provided the Coastal Commission with a "misleading water supply and demand analysis that was specifically rejected by the (California Public Utilities Commission)."

While Stoldt has had conversations with State Water Board staff, state water officials never responded in writing to the December letter refuting those claims, so the board Monday night approved the sending of a second letter requesting a hearing specifically to refute Cal Am's claims.

A Water District analysis adopted last spring that was considered by the Coastal Commission indicated among other things that the expansion of Monterey One Water's Pure Water Monterey project will go a long way in addressing water needs on the Peninsula and calling into question whether a desal plant the size Cal Am wants to build is necessary.

Catherine Stedman, a spokeswoman for Cal Am, said its concern with the Water District is that it objected to the desal project before the Coastal Commission ever met to consider the application. She added that Cal Am, in fact, supports the Pure Water Monterey project.

Adding to the equation is that the Monterey Peninsula has done a superb job of water conservation. Stoldt estimates that since 2009, when the cease-and-desist order was implemented, the Peninsula has conserved somewhere in the neighborhood of 3,000 acre-feet of water annually.

"The District also seeks a hearing to present evidence refuting other incorrect statements made by Cal Am ...," wrote Water District attorney David Laredo in the letter approved Monday. "Among other matters, this evidence will provide a current and accurate analysis of water supply and demand affecting the Cal Am system."

Pure Water Monterey takes wastewater, primarily sewer water and agricultural runoff, and using filtration and other cleansing technology can then inject the water into the Seaside basin to increase water supply without overtaxing the Carmel River basin.

Because Cal Am failed to meet the current Water Board's milestone, the state can levy a penalty by ordering a 1,000 acre-foot reduction in the amount of water it's pumping. Generally, Stoldt said, the district agrees with the penalty concept. But in this case, it is asking the State Water Board to waive the penalty because there was no fault assigned in the delay.

Stedman said Cal Am has no problem with the 1,000 acre-foot penalty as water consumption is low at present. She explained that in winter months when the river is gushing the company can take additional water and inject it into the Seaside basin as part of the Aquifer Storage and Recovery program it and the Water District operate. That recovery generated credits for future needs.

"The District can't have it both ways," Stedman said. "They can't object to desal and then ask for the 1,000 acre-foot (penalty) waiver," she said.

The other concern the letter outlined is the lack of collaboration among the water board and all the interested parties, called applicants. The water board and Cal Am were providing written communication to each other without including the other applicants, including the Water District.

Stedman said it was odd the Water District is now objecting since the mode of communication with the Water Board hasn't changed since 2019.

The entire debate over water, which governs development through new hookups, began when in 1995 the state discovered that Cal Am was illegally pumping water from the Carmel River aquifer. It had a specific amount it could take from an existing water right but the state found it taking far more and selling it to customers.

The letter will be emailed to 17 other individuals affiliated with the water supply issue. On Monday night the board also decided to add elected officials to the list.

Monterey water officials told to pay for another Cal Am review

California American Water Co. urged LAFCO commissioners to require another feasibility study, which is what the commission did. (Monterey Herald archive)
By DENNIS L. TAYLOR | dtaylor@montereyherald.com | Monterey Herald
PUBLISHED: June 29, 2021 at 2:11 p.m. | UPDATED: June 29, 2021 at 2:12 p.m.

SALINAS — An inter-governmental body wants Monterey Peninsula water officials to pay for an independent third-party review of costs associated with a planned takeover of California American Water Co., a study water officials say they've already performed at a cost of over a half-a-million dollars.

A majority of commissioners with the Local Area Formation Commission for Monterey County (LAFCO) said Monday night they want the Monterey Peninsula Water Management District to foot the bill for an independent review to better establish the financial wherewithal of the district to operate a water delivery system, something the district believes it has already performed reliably.

LAFCO is charged with encouraging the orderly formation of local governmental agencies, discouraging urban sprawl, and encouraging the efficient delivery of local government services. It is composed of two directors representing the county, two representing cities (rotated), two representing special districts such as fire districts and one member at large.

That water district needs LAFCO to establish that the district can provide water delivery service, called "latent powers," as well as receive approval to annex 58 additional parcels of land into the district boundaries. If LAFCO does not approve those two requirements then the district's effort to acquire the water retailer could grind to a halt.

There are two ways the district can acquire Cal Am: purchase it at a negotiated price or seize it through eminent domain proceedings in court.

Dave Stoldt, the general manager of the water district, made himself available to answer questions the LAFCO commissioners might have had Monday night, but none were asked and on a 5-2 vote, the agency is now requiring a special study to try and establish current valuations of Cal Am for an eventual takeover.

Tuesday morning Stoldt was scratching his head as to why the commissioners ordered another review when the district has already done a feasibility study. During the meeting commissioners repeated the need for an "independent" study, implying that the data provided in the district's study was somehow inadequate, a study that cost the district at least $625,000 and took nine months to complete.

"We got one of the best consultants in the nation to do a third-party study, including an investment banking team," Stoldt said. "My gut instinct is they didn't read the report."

The district study placed the valuation at roughly $513 million, whereas Cal Am said its appraisal indicated the company was worth more than $1 billion. On Monday Cal Am attorney George Soneff, a real estate litigator for Los Angeles-based Manatt, Phelps and Phillips, opened the public comment period by telling commissioners that financial analyses by the district were flawed and contained numerous errors.

"This is audacious, this is a stunning proposal in its scope," Soneff told commissioners Monday night. "(The district) contends it's a half-billion-dollar proposal. Cal Am has submitted a certified appraisal report showing it's a billion-dollar proposal."

Stoldt maintains that Cal Am's proposal includes a valuation for a desalination plant that hasn't been built, asking "how do you appraise something that doesn't exist?"

The commissioners' vote ran counter to an overwhelming majority of callers, by a 3-to-1 margin, who urged the commission to move the district's plan forward, as well as LAFCO's own staff's recommendations that included "no additional independent analysis is needed."

One caller, Margaret-Anne Coppernoll, reminded commissioners of Measure J that was approved by voters in 2018 that included language specifically to "acquire the water system assets owned and operated by the California American Water Company."

"In a Constitutional republic it is we the people who have been vested with the power to govern," she said.

Another caller, Michael Baer, noted that "Cal Am has the highest rates in the nation" and raised the issue that many of the commissioners are not Cal Am customers.

"Some of you don't have any skin in the game — you don't live in the service area," he said.

Leading the charge to require an additional study was Commissioner Luis Alejo, who is also a Monterey County supervisor representing the district encompassing the city of Salinas — outside of Cal Am's service area.

Twice Alejo brought up LAFCO Executive Officer Kate McKenna having changed her mind about the recommendation, asking rhetorically why she now recommended approval when she didn't before. He added that it is LAFCO, as a legislative body, that has the responsibility of developing findings rather than accepting either Cal Am's appraisal or the district's feasibility study.

"The court will look to the administrative record," he said. "We need to get the best updated information possible."

Other elected officials representing portions of the county outside Cal Am's service area who voted for the additional study include Salinas Mayor Kimbley Craig and Monterey County District 3 Supervisor Chris Lopez, whose district covers all of the southern portion of the county south of Salinas.

"It seems as though commissioners who don't live in the water district are aligned with Cal Am," Stoldt said. "They let Cal Am attorneys lead them."

In the end, a motion was made and seconded to require the additional review, but Alejo introduced a slightly different motion that expressly said the water district will need to pay for it. That was the motion that passed Monday.

Certificate of Completion

This certifies that

James Eric Tynan

Has met the requirements for successful completion of the learning event entitled:

Financial Management and Accounting with QuickBooks ONLINE -Part 1

6/8/2021, 10:00 AM - 6/8/2021, 12:00 PM
Online

2 California Drinking Water Contact Hours

Instructor(s): Mary Fleming-Leslie

RCAC
www.rcac.org

Suzanne Anarde, CEO

This training course was presented by Rural Community Assistance Corp Training Dept
3120 Freeboard Dr #201 West Sacramento, CA 95691 916-447-9832 x 1429 or email registration@rcac.org.

Contact Hours have been approved for the Registered Environmental Health Specialist program.

Certificate of Completion

This certifies that

James Eric Tynan

Has met the requirements for successful completion of the learning event entitled:

Financial Management and Accounting with QuickBooks ONLINE -Part 2

6/8/2021, 2:00 PM - 6/8/2021, 4:00 PM
Online

2 California Drinking Water Contact Hours

Instructor(s): Mary Fleming-Leslie

RCAC
www.rcac.org

Suzanne Anarde, CEO

This training course was presented by Rural Community Assistance Corp Training Dept
3120 Freeboard Dr #201 West Sacramento, CA 95691 916-447-9832 x 1429 or email registration@rcac.org.

Contact Hours have been approved for the Registered Environmental Health Specialist program.

Drought: The end of California's groundwater free-for-all

Long opposed, meters are now measuring farmers' water use in the Golden State

PUBLISHED: July 5, 2021 at 6:00 a.m. | UPDATED: July 9, 2021 at 10:31 a.m.

The water spigots on California farms will soon be twisted tighter.

As the state faces a growing threat from drought, an increasing number of water agencies are planning to require flow meters on agricultural wells, part of a landmark effort to measure and constrain pumping that used to be free and unlimited. It's a controversial step aimed at protecting water supplies that could change cultivation practices in the Golden State's thirsty fields.

"It's hard to be as efficient as possible if you don't know how much water you're using," said Sierra Ryan, interim water resources manager for Santa Cruz County.

Under the state's tough new groundwater protection law, "we now have a legal obligation to manage our groundwater sustainably," she said. "And we cannot manage the basin with such large uncertainties in our water use."

The new approach is a major shift. Since California's early rough-and-tumble frontier days, the ability to pump water from a private well on personal property has been an agricultural birthright. If you owned the land, the thinking went, you owned the water under it. So while cities charge residents based on the amount of water they use, rural well owners did not need to report – or measure – their pumping.

MOSS LANDING, CA – JUNE 29: A meter used to measure well water usage is photographed in a strawberry field in Moss Landing, Calif., on Tuesday, June 29, 2021. For generations, the Pajaro Valley's groundwater was free, and farmers were not required to report or even measure how much water they pumped from the ground. A depletion of well water along with saltwater intrusion has ended that practice, and it is now required that every farm has a meter on its wells, just like suburban homes. The strategy will now serve as a model for the rest of drought-parched California. (Doug Duran/Bay Area News Group)

Even as aquifers drained, causing the land to sink and seawater to intrude, "well meters" were fighting words. The only way for officials to gauge pumping was to take aerial photos or track electricity consumption.

But the 2014 Sustainable Groundwater Management Act — SGMA, pronounced "sigma" — changes all that. It was adopted during the state's last devastating drought, when farmers relied on their wells for survival and pumped from aquifers like never before.

The law asserts that groundwater is a shared resource. While it upholds a farmer's right to pump, it imposes rules on its use. For the first time in California history, managers of the state's 140 most overdrawn groundwater basins must balance the amount of water being pumped from, and recharged into, aquifers by 2040. It allows increased pumping during drought only if no major problems result.

Managers of the most imperiled aquifers submitted their sustainability plans in January 2020. Santa Cruz County, for instance, aims to protect its groundwater in a multi-part plan of metering, conservation and recycling. In the Salinas Valley, a basin manager also will require metering.

MOSS LANDING, CA – JUNE 29: Leonard Villanueva, Meter Program Coordinator for the Pajaro Valley Water Management Agency, looks at a meter used to measure recycled water for irrigation in a strawberry field in Moss Landing, Calif., on Tuesday, June 29, 2021. The water usage can also be tracked from their offices by using the telemetry equipped meter. Along with well water, recycled water gives farmers another resource to irrigate crops. (Doug Duran/Bay Area News Group)

And in some of the state's most-troubled groundwater basins, water managers are not only metering farmers' water use but charging them for it.

Pajaro Valley — a landscape of soft fog, ocean breezes and a multimillion-dollar agricultural industry — was one of the earliest adopters of metering. With no surface sources, nearly all of its water comes from the ground. Starting in the 1950s, so much water was drawn from wells that the water table plummeted, permitting seawater to seep in. In the 1980s, the state authorized that Pajaro Valley Water Management Agency to take protective steps.

Now 900 water meters — green cylinders, smaller than a soccer ball — are welded onto well pipes among vast fields of lettuce, artichokes and plump strawberries.

This effort, combined with other measures, has reduced annual groundwater use by 7.8%, on average, between two five-year periods: 2006 to 2010 and 2015 and 2019, according to the agency. A recent U.S. Geological Survey analysis found the water table is generally stable, and there's no evidence of land sinking due to groundwater extraction.

"Metering tells us if we're going in the right direction or in the wrong direction," said Brian Lockwood, the agency's general manager. "Hopefully, it allows people to think about water use in a different way."

The new state law bolsters its case, he said. "Prior to the Sustainable Groundwater Management Act, it was always like walking up a sand dune — one step up, and then half step back," said Lockwood. "Now, we're not alone in needing to achieve sustainable resources. It's every groundwater basin in California."

Every day, staffers span the Pajaro Valley, sometimes hiking miles through the mud or fog to read flow rates and consumption at 40 to 80 different sites. In the future, the agency aims to use telemetry, so data can be viewed from the comfort of an office.

Growers are billed $246 an acre-foot, the equivalent of an acre of water one foot deep. In four years, fees will increase to $346. Those who allow their property to be flooded with stormwater, helping replenish the aquifer, can earn rebates. The agency also offers inducements, such as efficiency gadgets and incentives to fallow land.

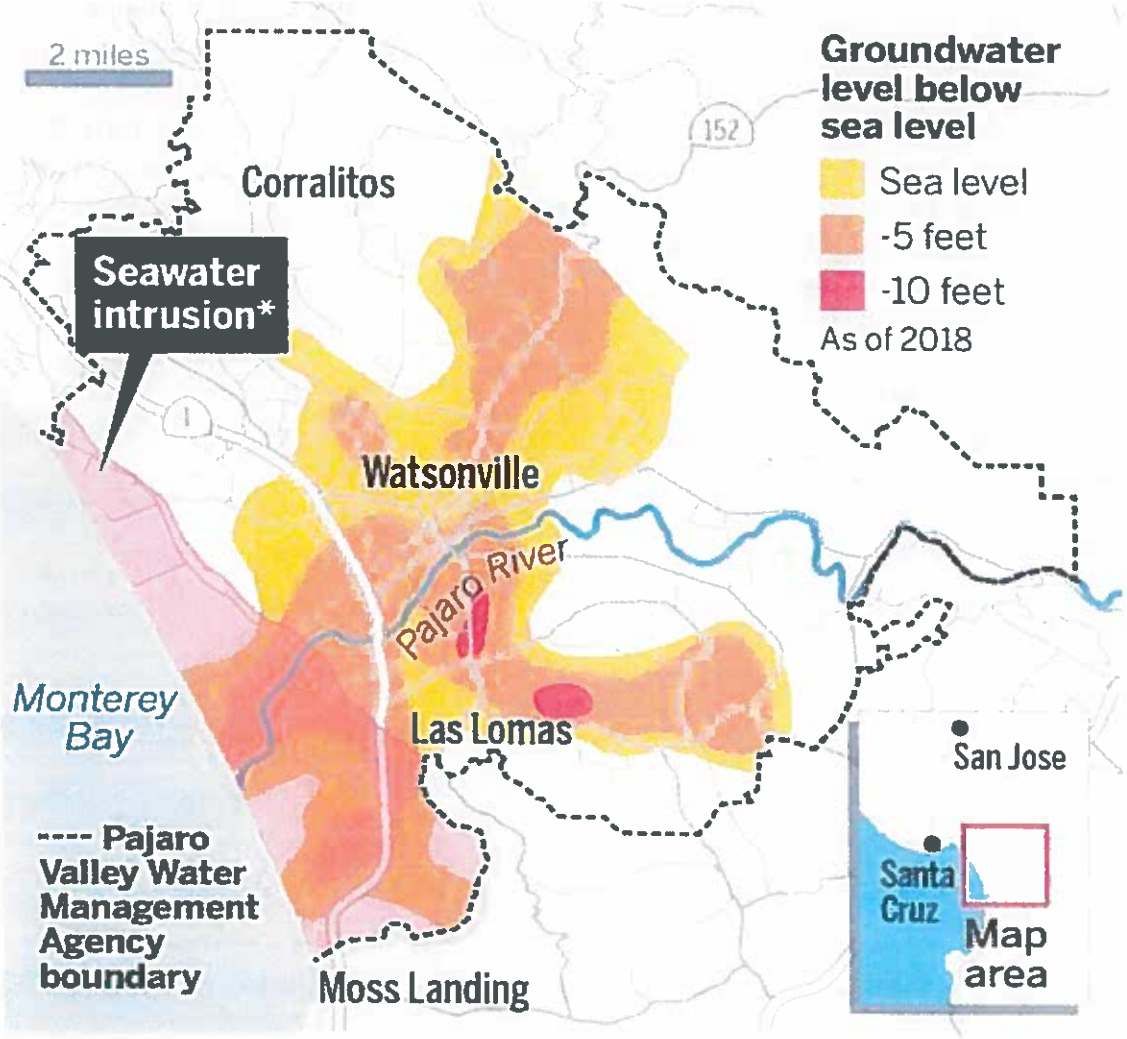
A handful of farms have refused access; their bills are estimated, with stiff penalties added.

MOSS LANDING, CA – JUNE 29: Strawberries are photographed in a field in Moss Landing, Calif., on Tuesday, June 29, 2021. For generations, the Pajaro Valley's groundwater was free, and farmers were not required to report or even measure how much water they pumped from the ground. A depletion of well water along with saltwater intrusion has ended that practice, and it is now required that every farm has a meter on its wells, just like suburban homes. The strategy will now serve as a model for the rest of drought-parched California. (Doug Duran/Bay Area News Group)
The agency's data is shared with farmers to help guide their irrigation practices. The agency also notes which crops are being grown, so it can build an accurate model of the region's changing land-use patterns — essential for long-term water planning.

"I think it's worked out pretty well for everybody," said Dick Peixoto, owner of the 3,000-acre Lakeside Organic Gardens in Watsonville, which produces 45 different types of organic vegetables.
But there's sticker shock, said Peixoto, who estimates he pays nearly $1 million a year for water that used to be free.

GROUNDWATER PRESERVATION

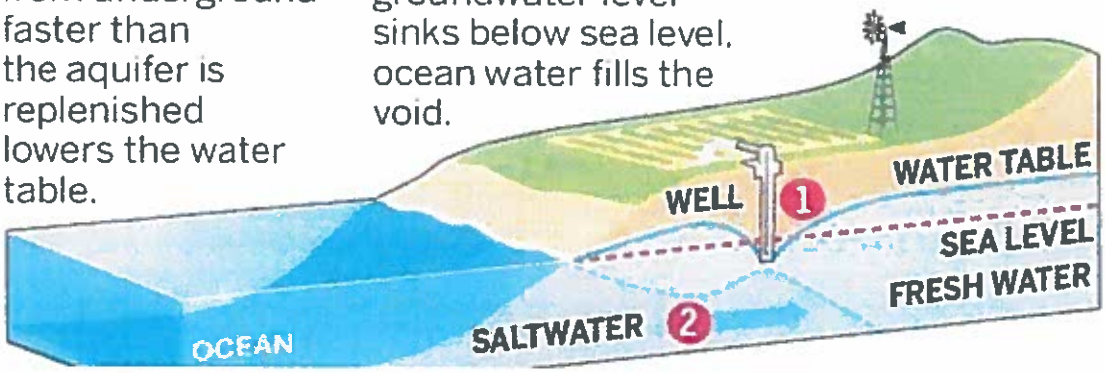
For generations, the Pajaro Valley's groundwater was free, and farmers were not required to report how much water they pumped from the ground. A crisis of depletion and saltwater intrusion ended that practice. The state's new Sustainable Groundwater Management Act requires water managers to ensure stability of their groundwater basin.



Problem: Seawater intrusion

1 Pumping water from underground faster than the aquifer is replenished lowers the water table.

2 When the groundwater level sinks below sea level, ocean water fills the void.



Monterey Peninsula letter writers blast commission decision

By DENNIS L. TAYLOR | dtaylor@montereyherald.com | Monterey Herald
PUBLISHED: July 19, 2021 at 2:04 p.m. | UPDATED: July 19, 2021 at 2:05 p.m.

MONTEREY — A chorus of letters have poured into the Monterey Herald from residents who said they believe an inter-governmental board should not be able to hold up efforts for a public water system to acquire California American Water Co.

The letters began shortly after a June 28 Herald article when the board of the Local Agency Formation Commission, or LAFCO, voted to require the Monterey Peninsula Water Management District to foot the bill for an independent study on the feasibility of the water district to buy out Cal Am, a study the water district says it has already done.

The Monterey County LAFCO typically votes on matters such as when a municipality wants to annex land into its boundaries, not on water issues. But in order for the Peninsula water district to acquire Cal Am, it must first go through LAFCO so it can acquire 58 parcels that currently lie outside of district boundaries.

LAFCO commissioners are members of the Monterey County Board of Supervisors, mayors of cities within the county and representatives from special agencies like fire districts.

More than a dozen letters right up through Sunday have been published since the LAFCO decision, most of which have criticized the commission's vote as being "in Cal Am's camp" and voted on by commissioners who don't represent the Monterey Peninsula and who are not Cal Am customers.

Melodie Chrislock is the managing director of Public Water Now, a nonprofit that drafted Measure J in 2018, which voters by a 56% to 44% margin approved and that requires the water district to pursue a buyout of Cal Am. In a July 13 letter, Chrislock said LAFCO is "standing in the way" of the buyout.

"A LAFCO board is supposed to be neutral, independent and provide balanced representation," Chrislock wrote. "Unfortunately, the Peninsula is not well represented on the LAFCO board, with only one mayor from the Peninsula and no supervisors. Most LAFCO members are not Cal Am customers, yet they could block the voter-mandated buyout of Cal Am."

The two county supervisors on the LAFCO board, Luis Alejo and Chris Lopez, represent districts in the Salinas Valley area. Another board member who voted to

force another study is Kimbley Craig, the mayor of Salinas. The only Peninsula mayor on the board is Seaside's Ian Olglesby, who voted against another study and is in favor of the annexation.

But Catherine Steadman, a spokeswoman for Cal Am, said it's obvious the LAFCO board is not favoring anyone.

"LAFCO is obligated by statute to make independent findings as to the feasibility and impacts of a government takeover of a public utility service," Steadman said in an email Monday. "At this point, the board has received the district's view of the feasibility and impacts, and our view. We understand the board doesn't see either version as objective and feels the complex analysis required to reach a reasonable conclusion should be conducted by an outside, independent expert."

Still, another letter writer on Sunday, Roland Martin of Carmel, went so far as to describe the LAFCO board as a pawn of Cal Am and that the board should not try and be a Peninsula water authority.

"(LAFCO), which has no vested interest or control over the distribution of water or its usage, is now being used by Cal Am as a foil in its efforts to avoid a takeover," Martin wrote. "As you would not take a pet poodle to CHOMP for analysis and evaluation, any analysis or valuation regarding water should not rest in the hands of LAFCO."

One key issue in the debate is the price of a Cal Am valuation. The district study placed the valuation at roughly $513 million, whereas Cal Am said its appraisal indicated the company was worth more than $1 billion.

The commissioners' vote ran counter to an overwhelming majority of callers, by a 3-to-1 margin, who urged the commission to move the district's plan forward. The board also ignored its own staff's recommendation that included "no additional independent analysis is needed."

Dennis L. Taylor | Reporter
Dennis L. Taylor has reported on diverse issues for three decades in the San Francisco and Monterey bay areas, including 10 years in the Silicon Valley business press covering venture capital and technology investments.
dtaylor@montereyherald.com

Monterey Peninsula water officials reluctantly agree to pay for buy-out study

By DENNIS L. TAYLOR | dtaylor@montereyherald.com | Monterey Herald
PUBLISHED: July 20, 2021 at 2:32 p.m. | UPDATED: July 20, 2021 at 2:32 p.m.

MONTEREY — Officials with the Monterey Peninsula water district begrudgingly agreed Monday to pay for a feasibility study requested by an intergovernmental body that has control over the future of the district's plan to take over California American Water Co.

The board of directors of the Monterey Peninsula Water Management District during its regular meeting Monday approved up to $70,000 to pay for a study that was in effect ordered by the Local Agency Formation Commission, or LAFCO, that will analyze the district's ability to deliver water as well as having the financial wherewithal to buy out Cal Am.

LAFCO must approve what's called the district's "latent powers," since a special district such as the water district cannot provide a "new or different service" without LAFCO's approval. The takeover of Cal Am will constitute a new or different service.

The study must be conducted if the water district wants to move forward with its plans to acquire the for-profit water delivery company. The water district's board approved the spending despite insisting the information LAFCO commissioners want has already been provided in a 119-page feasibility report conducted by Raftelis Financial Consultants in late 2019.

And a financial analysis by Barclay's – a $40 billion investment bank based in London — concluded that given the Raftelis and district assumptions for capital and operating costs, revenues and rates, the district "is able to finance the proposed purchase of the system based on comparisons with financing structures and coverage margins for similar water systems."

But the LAFCO board apparently didn't believe those companies were independent enough and chose their own consultant that the water district must pay for, which translates to what ratepayers must pay for. LAFCO staff found the Raftelis analysis adequate but the board thought differently.

The results of the financial study was a $513 million acquisition value for Cal Am. But Cal Am has stated its value is closer to $1 billion. The disparity between the two

values was one of the reasons the LAFCO commissioners wanted another third-party analysis. It chose a firm called Berkson Associates. Water district general manager Dave Stoldt noted that Cal Am's claim of a $1 billion value included its proposed desalination plant, which hasn't been built yet.

"They appraised assets that don't exist," Stoldt said Monday night.

But Catherine Steadman, a spokeswoman for Cal Am, said it's obvious the LAFCO board is not favoring anyone.

"LAFCO is obligated by statute to make independent findings as to the feasibility and impacts of a government takeover of a public utility service," Steadman said in an email Monday. "At this point, the board has received the district's view of the feasibility and impacts, and our view. We understand the board doesn't see either version as objective and feels the complex analysis required to reach a reasonable conclusion should be conducted by an outside, independent expert."

Stoldt said Berkson will likely produce much of the same data that Raftelis did and "will do a lot of the reading LAFCO commissioners failed to do."

"It's a lot like borrowing my watch to tell me what time it is," Stoldt said.

Board director Safat Malek questioned the process LAFCO used by not providing the district with an inkling of what the scope of the Berkson analysis will entail.

"No one knows the scope of services except them," Malek said Monday night. "Since we are paying shouldn't we know the scope of work?"

Board Co-chair Karen Paull noted that many "indisputable facts" that would be part of any analysis reside within the California Public Utilities Commission – Cal Am's regulators.

Director George Riley asked whether any study involving Cal Am would be accurate since the public has no access to the company's inner workings.

"It will be a one-sided review of our data and not Cal Am's," Riley said.

ENVIRONMENT

Without Enough Water To Go Around, Farmers In California Are Exhausting Aquifers

Well water is pumped into an irrigation system at a vineyard in Madera, California. California is suffering from drought, and farmers in the state's Central Valley are pumping more groundwater from their well to make up for a shortfall in water from the state's reservoirs.
Justin Sullivan/Getty Images

The next time you pick up some California-grown carrots or melons in the grocery store, consider the curious, contested odyssey of the water that fed them. Chances are, farmers pumped that water from underground aquifers on a scale that's become unsustainable, especially as the planet heats up.

Facing an ongoing drought that is squeezing surface water supplies, farmers are extracting groundwater at higher rates to continue growing food as usual.

California's farmers probably will pump an additional six to seven million acre-feet of water from their wells this year, above what they normally use, according to Josue Medellin-Azuara, a water expert at the University of California, Merced. That quantity would cover 10,000 square miles with a foot of water, and far exceeds the amount that naturally replenishes the aquifer, even during a year with normal rainfall.
"It's a huge amount," says Steve Jackson, a farmer in Visalia who helps to manage 40,000 acres of almonds and other crops. "I'd say 90 to 95 percent of our crop demands this year are going to be met by groundwater."

This year, however, may mark the beginning of the end of California's great groundwater grab. The state is preparing to phase in new limits on groundwater pumping that will force painful adjustments on the state's farmers.

California is a powerhouse of food production, growing some 40 percent of the country's fruit, vegetables, and nuts. Yet the production depends on a supply of water that's increasingly fragile and unreliable as the climate warms.

"Drought reveals the lie of a place," says Mark Arax, the Fresno-based author of *The Dreamt Land*, a history of California's water conflicts. "The lie is our ambition. We've taken on too much."
In good years, an intricate system of dams, aqueducts, and irrigation canals captures water from rivers and melting snow, much of it in the northern part of the state, and moves that

water to fields in the wide Central Valley where most crops are grown. The system also supplies coastal cities, but agriculture remains the largest consumer of water.

This year, rivers are running low. The state's biggest reservoirs contain less than half the average amount of water, and farmers have been forced to rely on their wells. "This year, there is no allotment, because there is no water," says Kathy Briano, referring to the amount of water that farmers are assigned for irrigation use. Briano grows almonds near the town of Porterville, and she's relying on her wells instead.
Until now, groundwater use in California has been unrestricted. Farmers and cities could pump as much as they wished. And there was a time when that water source seemed inexhaustible.

The Central Valley aquifer is like a giant, multi-layered lake beneath the ground. "A hundred years ago, when you tapped a foot into the earth, in certain parts of the valley, the water would gush out," Arax says. At that time, wells typically only needed to be 50 or 80 feet deep.

But year after year, towns and farmers --- but mostly farmers --- pumped more water out of the aquifer than nature put back in, and the water table fell. Today, farmers and towns are drilling wells over a thousand feet deep. Extracting so much water even changed the region's geology."As you draw the water up and out of the earth, the earth itself then collapses and sinks," Arax says. "We're not sinking by inches. We're sinking by feet."

Briano says the problems first became obvious during the drought of 2014-2015. "Everybody was pumping," she says. "You had to pump all that you needed, and you just brought that groundwater down to nothing."

On her ranch, the water table dropped by 60 feet. The well that supplied water to her house went dry. The same thing happened to hundreds of people who relied on shallow wells in the nearby town of East Porterville. "People were without water, and they had to bring water tanks in. They had no water at all!" she says.

During that drought, there was growing pressure to enact limits on groundwater use. Susana De Anda, executive director of the Community Water Center, in the town of Visalia, was among those pushing for change. "When 90 percent of our valley residents rely on groundwater, we have to be sure that we're sharing that for all beneficial uses," she says. "That means that we should not over-pump."
In 2014, California passed the Sustainable Groundwater Management Act (SGMA). It requires big changes, but they will be enforced only gradually, over the next two decades. Under this law, overuse of the aquifer must end by 2040. By that date, use and replenishment of the state's groundwater must be in balance.

State and local officials now are coming up with limits on groundwater use to achieve this. In practice, it could mean that farmers in the San Joaquin Valley, which occupies a large area of the Central Valley between Sacramento and Bakersfield, will have to cut their groundwater pumping by 70 or 80 percent by 2040, compared to what they're using this year.

In order to enforce these limits, some authorities are requiring meters on wells. Others are monitoring water use through satellites that can detect which crops are being grown.

The reaction among farmers has been mixed. Some, like Steve Jackson, agree that limits are necessary, even though groundwater has kept his farm alive in drought years. "It is a lifeline, but I think that it's a lifeline that we've all taken for granted, and it's not infinite,"he says. "I think that's what's coming home to all of us."

The limits probably will mean that some land will no longer grow crops, although there's dispute about how much. One study, backed by the agricultural industry, predicts that a million acres, or 20 percent of the fields in the San Joaquin Valley, will be taken out of production. Other researchers think it will be half that much. Farmers are likely to adapt by shifting their limited water supplies to their most valuable crops. They also will be able, for the first time, to buy and sell groundwater allotments, shifting the water to the places where it's worth the most.
Other farmers, like Kathy Briano, reject the prospect of idling fertile Central Valley land. Briano agrees that it makes sense to protect the aquifer. But to make up for it, she wants the state to deliver more water from dams and reservoirs, to which she says the farms are entitled. "My solution is, you need to bring us more water," she says. "We can't keep taking from the valley, because we're taking away [food] production, and where can we grow everything? Right here!"

Mark Arax, the writer, says the changing climate is likely to breed more conflicts like this, also in other parts of the country. "How we deal with this becomes an example for the rest of America, when it comes to their doorstep," he says.

The California dream was born in the Gold Rush, claiming nature and re-shaping the land. Now, Arax says, it's time to re-invent that dream.

ENVIRONMENT
The Great California Groundwater Grab

lidia@castrovillecsd.org

From:	Michael DeLapa <execdir@landwatch.org>
Sent:	Thursday, July 8, 2021 3:38 PM
To:	lidia@castrovillecsd.org; Eric Tynan
Subject:	Your support for moratorium on new Deep Aquifer pumping in the 180/400-Foot Aquifer Subbasin
Attachments:	LandWatch to SVBGSA Adv Com re DA moratorium.pdf; Untitled attachment 00010.htm

Dear Castroville Community Services District Board of Directors:

LandWatch asks you to support its request to the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) that, pending completion of a sustainability study for the Deep Aquifers, it impose a moratorium on extractions from new Deep Aquifer wells in the 180/400-Foot Aquifer Subbasin, i.e., wells that were not permitted prior to July 1, 2021.

As you know, the cities of Marina and Seaside and unincorporated Monterey County, including Fort Ord and Castroville, rely on the Deep Aquifers to provide domestic supplies to their residents, including disadvantaged communities. The coastal communities are also critically dependent on groundwater from the Deep Aquifers to support affordable and market rate housing. Increased Deep Aquifer pumping puts these groundwater supplies at risk.

There is still no reliable information about the extent or sustainable yield of the Deep Aquifers. The last study of sustainable yield, the 2003 WRIME study, concluded that increasing the extractions to 4,000 AFY would induce seawater intrusion in the upper aquifers and risk contamination of the Deep Aquifers themselves. Despite this, Deep Aquifer extractions have tripled over the past ten years and are now over 10,000 AFY, as the County continues to permit more and more high-volume production wells without any form of environmental review - as emergency "replacement wells." (Monterey County Water Resources Agency (MCWRA), Well Permit Application Activities Update, prepared for May 17, 2021 MCWRA Board of Directors meeting.) MCWRA reports that Deep Aquifer groundwater levels have been falling since 2014 and it has documented migration of contaminated upper aquifer water to the Deep Aquifers.

Permitting increasing Deep Aquifer pumping runs counter to the repeated recommendations of MCWRA staff that there be a moratorium on new Deep Aquifer pumping until completion of a sustainability study. And it runs counter to the 2020 Groundwater Sustainability Plan for the 180/400-Foot Aquifer Subbasin, which assumes that there will be a moratorium on new Deep Aquifer extractions pending completion of the Deep Aquifers study.

The Deep Aquifer study, recommended by MCWRA in 2017, has still not commenced and the County has not acted on MCWRA's 2020 recommendation for a moratorium. At this point, the SVBGSA should exercise its independent authority under SGMA to halt new Deep Aquifer extractions, i.e., the authority that the 180/400-Foot Aquifer Subbasin Groundwater Sustaiability Plan expressly cites in connection with the expected Deep Aquifer moratorium.

Accordingly, LandWatch has asked SVBGSA to halt new Deep Aquifer extractions pending completion of the sustainability study in letters dated June 9, 2021 and July 8, 2021 (attached) and in comments at the most recent meetings of the Advisory and the Executive Committees. In response, at least one member of the Advisory Committee has asked that the matter be placed on the agenda. Please add your voice and the voice of your agency to this reasonable and urgent request by writing to the SVBGSA Advisory Committee and its Board of Directors.

Best regards,

Michael

Via e-mail

July 8, 2021

Members of the Advisory Committee
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924

Re: Moratorium on new Deep Aquifer pumping pending completion of study

Dear Members of the Advisory Committee:

The Advisory Committee should recommend that the Salinas Valley Basin Groundwater Sustainability Agency (SVBGSA) enact a pumping moratorium on new Deep Aquifer wells permitted after July 1, 2021 in the 180/400-Foot Aquifer Subbasin pending completion of the proposed Deep Aquifer study. The reasons for this proposal are set out in LandWatch's June 9, 2021 letter to the SVBGSA Board of Directors, attached hereto as Exhibit 1.

Despite Monterey County Water Resources Agency's (MCWRA's) 2017 and 2020 recommendations for a moratorium on new Deep Aquifer wells, pumping from the Deep Aquifers has accelerated dramatically. Pumping in 2019 reached 10,347 AFY, despite the findings in the 2003 WRIME study that pumping even 4,000 AFY would aggravate seawater intrusion in the overlying aquifers and potentially contaminate the Deep Aquifers themselves. Groundwater levels in the Deep Aquifers have in fact fallen substantially since 2014, increasing the downward hydraulic gradient between the Deep Aquifers and the 400-Foot Aquifer and inducing vertical migration of impaired groundwater.

LandWatch believes that Priority Management Action Number 5 in the 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan (180/400 GSP) requires that the GSA take action. Priority Management Action Number 5 provides categorically that new Deep Aquifer pumping will not be allowed until the study is completed:

> SVBGSA will support extension of Ordinance 5302 immediately. *Deep Aquifers pumping will only be allowed after MCWRA completes its study of the Deep Aquifers' sustainable yield.*

(180/400 GSP, p. 9-20, emphasis added.) The 180/400 GSP explains that the GSA itself has the authority to halt extractions from the Deep Aquifer, citing California Water Code §10726.4 (a)(2). (*Id.* at 9-20.)

SGMA requires that a GSP "*shall* include a description of the projects and management actions the Agency has determined will achieve the sustainability goal for the basins." (23 CCR § 354.44(a), emphasis added.) The management actions must be described in detail and must be "supported by best available information and best available science." (23 CCR § 354.44(b), (c).) Here, the 180/400 GSP identifies specific measurable objectives and expected benefits from Priority Management Action Number 5, including reduced seawater intrusion, reduced

vertical migration of contaminants, attainment of groundwater storage objectives, and avoidance of unreasonable groundwater elevations. (180/400 GSP, pp. 9-19 to 9-20.)

Management actions are not just a paper exercise. The GSA must actually implement the management actions that the GSP identifies as necessary to sustainability. The GSA must periodically evaluate "whether the actions under the plan are meeting the plan's management objectives and whether those objectives are meeting the sustainability goal in the basin." (Water Code, § 10728.2.) DWR must also find that the GSA is actually implementing its projects and management actions. (23 CCR § 355.6(c)(2).)

Despite this, the GSA's legal counsel has argued the GSA has no "independent duty" to restrict pumping in the Deep Aquifers, despite the County's failure to take the very action on which the GSP's conclusions were predicated. (Les Girard, memorandum to SVBGSA Board of Directors, June 30, 2021, p. 2.) Mr. Girard argues that the GSP assumed that the *County* would impose the necessary moratorium and that "there is nothing in the text indicating that the SVBGSA will impose its own moratorium or extraction limitations, only that the SVBGSA will support a further moratorium imposed by the County of Monterey." (*Id.*)

This strained and formalistic reading of the GSP ignores the substantive basis of the GSP's sustainability conclusions, which is that *no new pumping from the Deep Aquifers will be allowed until the study is completed.* The GSA cannot reasonably find that the "actions under the plan are meeting the plan's management objectives" (Water Code, § 10728.2) if those actions have been aborted by a third party's failure to act. The GSA should use its authority and accept its duty to take the action necessary to meet the GSP's stated objectives and to obtain its express benefits.

Sincerely,

Michael D. DeLapa
Executive Director

Cc: SVBGSA Board of Director, board@svbgsa.org
Donna Meyers, meyersd@svbgsa.org
Gary Petersen, peterseng@svbgsa.org

EXHIBIT 1

Landwatch letter to SVBGSA Board, June 9, 2021

m | r | wolfe
& associates, p.c.
attorneys-at-law

June 9, 2021

Via e-mail

Members of the Board of Directors
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924
Via email board@svbgsa.org

Re: Failure to implement the Salinas Valley Groundwater Basin 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan

Dear Members of the Board:

We write to object to the failure of the Salinas Valley Groundwater Basin Groundwater Sustainability Agency (SVGBGSA) to take effective steps to implement a critical part of the Salinas Valley Groundwater Basin 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan (GSP).

The GSA has failed to implement "Priority Management Action # 5" in the GSP, which calls for a moratorium on additional well drilling in the Deep Aquifers in the 180/400-Foot Aquifer Subbasin pending completion of a study to determine their sustainable yield. Since its January 2020 adoption of the GSP, the SVGBGSA has not taken action to effect that moratorium and neither Monterey County nor the SVGBGSA have begun the study of the Deep Aquifers.

The County and the SVGBGSA have allowed new wells and increased pumping in the Deep Aquifers to impair water quality and to mine a groundwater resource. In May 2020, Monterey County permitted its moratorium on Deep Aquifer wells to expire, but the SVGBGSA failed to impose pumping restrictions, despite its authority to do so under Water Code Section 10726.4(a)(2). Since then, Monterey County has resumed issuing permits for Deep Aquifer wells. In 2020, 5 additional high capacity Deep Aquifer wells were constructed, and as of May 3, 2021, there were at least two additional permit applications pending. Pumping from the Deep Aquifers is now more than two and a half times the level that was projected to induce seawater intrusion in the upper aquifers and potentially intrude contaminated groundwater into the Deep Aquifers themselves.

The SVGBGSA should take immediate action to implement the GSP by prohibiting pumping from any new wells constructed in the Deep Aquifers. If the SVGBGSA fails to implement the GSP, the Department of Water Resources should compel it to do so under its authority to ensure that an adopted GSP "is being

implemented in a manner that will likely achieve the sustainability goal for the basin." (23 CCR § 355.6(a).) In determining whether GSP implementation is consistent with SGMA, DWR is charged to consider whether "the Agency is implementing projects and management actions consistent with the Plan." (23 CCR § 355.6(c)(2).) Here, it is clear that the continued permitting and construction of new wells in the Deep Aquifers is inconsistent with the GSP, which calls for a continued moratorium on such wells. Because the SVGBGSA has determined that a moratorium is needed to protect the Deep Aquifers pending completion of a study to determine sustainable yield, the failure to complete the study or to halt new wells demonstrates a failure to protect and manage the aquifers using the "best available science." (23 CCR § 355.4(b)(1).)

A. Background

There are a number of subbasins and "management areas" in the Salinas Valley Groundwater Basin. Although the full areal extent of the Deep Aquifers is unknown, the Deep Aquifers are located in the 180/400 Foot Aquifer Subbasin and the Monterey Subbasin, which are both coastal subbasins in the Pressure Subarea. There are several aquifers in these subbasins, denoted by their depth. Relevant historically productive aquifers in the coastal area include the 180-Foot Aquifer, the 400-Foot Aquifer, and the Deep Aquifers. (Brown and Caldwell 2015, MCWRA 2017.) The coastal areas of the 180-Foot Aquifer and the 400-Foot Aquifer suffer from seawater intrusion due to overdraft, which lowers the groundwater level below sea level. Since these aquifers are open to the sea, the seawater intrudes when the freshwater level has been lowered and no longer provides a barrier. (Geoscience 2013.)

The Deep Aquifers are poorly understood, but they are believed to be at least two separate aquifers. (WRIME 2003, p. 2-31; MCWD 2016, p. 37.) "The hydrostratigraphy, vertical and horizontal extents, and potential recharge areas for the Deep Aquifers are poorly known." (SVGBGSA 2020, p. 4-29; see also WRIME 2003, pp. 2-31 to 2-32.) However, the Deep Aquifers are believed to contain ancient water and there is currently no known source of recharge other than leakage of groundwater from aquifers above the Deep Aquifers, i.e., the 180-Foot and 400-Foot Aquifers. (WRIME 2003, p. 2-32; MCWRA 2020, pp. 35, 37; MCWD 2016, p. 37; MCWRA 2017 p. 53.) The "continued pumping of this old water represents mining of a groundwater resource." (MCWRA 2020, p. 37.)

The first production well in the Deep Aquifers was installed in 1974. (MCWRA 2017, p. 47.) From 1974 through the 1990s, new agricultural production wells went deeper and deeper to avoid seawater intrusion in the upper aquifers. (MCWRA 2017, p. 48.)

> The use of the Deep Aquifers for groundwater production has been driven by the need to drill deeper in order to avoid seawater intrusion, with wells being installed to subsequently deeper elevations with fresh-water-bearing materials.

(MCWRA 2017, p. 47.) Five agricultural production wells were drilled between 1974 and 1995. (MCWRA 2021, Figure 2.) In 1998, the Castroville Seawater Intrusion Project (CSIP) began to deliver recycled water to replace coastal pumping. (MCWRA 2017, p. 37.) Thus, for a period after 1998, agricultural pumping from the Deep Aquifers largely ceased and groundwater levels recovered. (MCWD 2016, p. 38; MCWRA 2017, pp. 27, 49-50.) No new agricultural wells were drilled in the Deep Aquifers from 1996 to 2005. (MCWRA 2021, Figure 2.) At that point, the only significant user of the Deep Aquifers was the City of Marina, whose wells in the 180- and 400-foot aquifers had become contaminated by seawater. (MCWD 2016, p. 45.)

A 2003 study for MCWD concluded that increasing pumping of the Deep Aquifers from the 2002 baseline level of 2,400 AFY to 4,000 AFY would (1) induce further seawater intrusion into the upper aquifers (the 180-Foot and 400-Foot Aquifers), which were vertically connected, and (2) risk contamination of the Deep Aquifers themselves. (WRIME 2003, pp. 4-7, 4-11 to 4-12.)

Unfortunately, construction of new agricultural production wells resumed in 2006 and accelerated in 2017-2020. (MCWRA 2021, Figure 2.) Today there are 57 Deep Aquifer wells in the 180-Foot and 400-Foot Aquifer Subbasin, including at least 32 agricultural wells. (*Id.*) Reported groundwater pumping has increased four-fold since 2002, from 2,416 AFY to 10,347 in 2019. (*Id.*)

So far, the Deep Aquifers are not believed to have been *directly* seawater intruded as a result of aquifer openings to the ocean. However, vertical flow from upper aquifers occurs, especially from wells that have been perforated multiple aquifers or are not properly sealed. This leakage permits migration of impaired groundwater between the upper aquifers and also to the Deep Aquifers. MCWRA reported in 2017 that this migration is induced and accelerated by over-pumping the Deep Aquifers.

> WRIME (2003) and Feeney and Rosenberg (2003) suggest that the predominant source of recharge to the Deep Aquifers is leakage from the overlying Pressure 180-Foot and Pressure 400-Foot Aquifers. Both of these aquifers have extensive areas of documented seawater intrusion overlying the Deep Aquifers. Continued pumping, and especially increased pumping, in the Deep Aquifers has the potential to induce additional leakage from the impaired overlying aquifers.

(MCWRA 2017, p. 54; *see also* MCWRA 2017, pp. 52, 53; MCWRA 2017, pp. 34-37 [discussing advancing seawater intrusion in the 400-Foot Aquifer due to vertical migration from the 180-Foot Aquifer].) MCWRA reported in 2017 that, despite efforts to limit inter-aquifer migration, "water quality data now show regional impacts from groundwater pumping are overriding the preventative measures implemented on the basis of site-specific hydrogeology, allowing for continued inter-aquifer migration of groundwater and advancement of seawater intrusion." (MCWRA 2017, p. 37.)

MCWRA again warned in 2020 that the vertical migration of upper aquifer water that is induced by additional pumping of the Deep Aquifers may carry contaminated groundwater to lower aquifers:

> As discussed in Section 5.2.9 of the 2017 Recommendations report, groundwater obtained through pumping of wells in the Deep Aquifers is thought to be recharged primarily by leakage from the overlying 180-Foot and 400-Foot Aquifers (Feeney and Rosenberg, 2003). Increasing groundwater pumping in the Deep Aquifers will likely result in increased leakage from overlying aquifers with impaired groundwater."

(MCWRA 2020, p. 35.) MCWRA reported in 2020 that Deep Aquifer groundwater levels have been falling since 2014, are well below sea-level, and that induced vertical migration of contaminated water to the Deep Aquifers themselves is in fact occurring:

> As is the case with the 180-Foot and 400-Foot Aquifers, groundwater levels in the Deep Aquifers are predominantly below sea level. Beginning around 2014, groundwater levels in the Deep Aquifers began declining and are presently at a deeper elevation than groundwater levels in the overlying 400-Foot Aquifer based on comparisons of multiple well sets at selected locations, meaning that there is a downward hydraulic gradient between the impaired 400-Foot Aquifer and the Deep Aquifers (Figure 16 and Figure 17). This decrease in groundwater levels coincides with a noticeable increase in groundwater extractions from the Deep Aquifers (Figure 16 and Figure 17). The potential for inducing additional leakage from overlying impaired aquifers is a legitimate concern documented by previous studies and is something that would be facilitated by the downward hydraulic gradient that has been observed between the 400-Foot Aquifer and Deep Aquifers.
>
> Seawater intrusion has not been observed in the Deep Aquifers. However, the Agency has documented the case of one well, screened in the Deep Aquifers, that is enabling vertical migration of impaired groundwater into the Deep Aquifers. The Agency is working with the well owner on destruction of this well

(MCWRA 2020, p. 31.)

B. Increasing Deep Aquifer well construction and pumping led to two-year moratorium on new Deep Aquifer wells from May 2018 to May 2020 to give the County time to conduct a study to determine sustainable yield.

By 2016, there were more than 40 wells in the Deep Aquifers, including high production agricultural wells, and pumping had reached 8,900 AFY – more than twice the 4,000 AFY level that the 2003 WRIME study concluded would induce seawater intrusion to the upper aquifers and put the Deep Aquifer itself at risk. (MCWRA 2017, pp. 47, 52.) In a 2017 study, MCWRA recommended a moratorium on new wells in the upper aquifers in the so-called "Area of Impact," the coastal area already suffering from

seawater intrusion. MCWRA also recommended a moratorium on new wells in the Deep Aquifers pending a sustainability study, noting that the moratorium on upper aquifer wells would drive people to drill more wells in the Deep Aquifers.

> The recommendation to prohibit construction of new wells in the Area of Impact and, following the enhancement and expansion of CSIP, to cease groundwater pumping within the Pressure 400-Foot Aquifer in the Area of Impact, has the potential to result in increased pumping in the Deep Aquifers. History has shown that once well construction and/or pumping is prohibited in a given area, people are very likely to drill wells to the next deepest water-bearing zone which, in this case, would be the Deep Aquifers. The construction and pumping of more wells in the Deep Aquifers will induce further leakage from the impaired overlying aquifers (Pressure 180-Foot and Pressure 400-Foot Aquifers), potentially degrading the water quality of the Deep Aquifers.

(*Id.*, p. 54.) MCWRA recommended a ban on Deep Aquifer wells continue until completion of a study because the Deep Aquifers are poorly understood.

> Scant data exists on the hydraulic properties of the Deep Aquifers. The areal extent, quantified rates of recharge, and estimates of water available for extraction are all topics that are poorly understood when it comes to the Deep Aquifers. Investigation of these and related topics should be completed before pursuit of groundwater from the Deep Aquifers continues.

(*Id.*, p. 54.) MCWRA specifically recommended that there be no exception for "replacement wells," i.e., wells that replace an existing well that fails due to water quality problems of structural failure. (*Id.*, p. 60.)

At the direction of the MCWRA Board of Directors and the County Board of Supervisors, a working group was convened for 90 days to develop an interim urgency ordinance. (Monterey County 2018a [Ordinance 5302, recital 6].) Based on some of this group's recommendations, in May 2018, the County enacted Urgency Ordinance No. 5302 imposing a 45-day moratorium on new wells in the 180, 400, and Deep Aquifers in the "Area of Impact," generally northwest of Davis Road. The ordinance also prohibited any new well in the Deep Aquifers outside the Area of Impact. As planned, on June 26, 2018, the Board adopted Ordinance No. 5303 which extended Ordinance No. 5302 until May 21, 2020, thus providing for a two year moratorium. (Monterey County 2018a, b [Ordinances 5302 and 5303].)

The announced intent of the moratorium in Ordinances 5302 and 5303 was to give the County and the SVGBGSA time to study the Deep Aquifer and develop further regulations within two years.

> This ordinance's temporary prohibition on drilling of new wells in the identified areas is necessary due to the current and immediate threat to the public health,

> safety, and welfare that would result from new wells in the Area of Impact and Deep Aquifers, pending the development of a plan for the sustainable management of the 180/400 Foot Aquifer Subbasin and the study and implementation of other steps to address seawater intrusion in the Pressure 180-Foot and Pressure 400-Foot Aquifers. *It is the intent and purpose of this interim ordinance to enact a ban that is only temporary in order to provide time for the County to study and develop appropriate regulations.* The areas where this ordinance applies will be the subject of study and development of further regulations, within two years of adoption of this ordinance, to address the sustainability of the groundwater supply. Pursuant to the Sustainable Groundwater Management Act (SGMA), the Salinas Valley Basin Groundwater Sustainability Agency and the Marina Coast Water District Groundwater Sustainability Agency must adopt Groundwater Sustainability Plans (GSPs) for sustainable management of the critically overdrafted 180/400 Foot Aquifer by January 31, 2020. Additionally, pursuant to Policy PS 3.1 of the 2010 Monterey County General Plan, the County is conducting a five-year comprehensive study of the Zone 2C assessment area of the Salinas Valley Groundwater Basin, including development of an integrated comprehensive hydrogeologic model to assess the ability of the Salinas Valley Groundwater Basin to provide a sustainable supply of water for land use activities projected to year 2030 under the General Plan and to 2040 for the GSP planning horizon. Additionally, on April 24, 2018, the Board of Supervisors endorsed a number of other measures recommended by the Ninety-Day Working Group for addressing seawater intrusion, such as destruction of certain identified wells. *A temporary halt on drilling of new wells in the denoted areas under this ordinance will enable the County to study and develop policies and regulations in connection with the Groundwater Sustainability Plans and results of the General Plan study and to implement other recommended actions.* Absent this ordinance, applicants could continue to obtain well permits that could exacerbate seawater intrusion without the guidance of regulations to be developed for the sustainable management of the Salinas Valley Groundwater Basin."

(Monterey County 2018a, emphasis added [Ordinance 5302, recital 8].)

C. Despite MCWRA's recommendations to the contrary, the County continues to permit so-called "replacement wells" in the Deep Aquifers.

Contrary to MCWRA's 2017 recommendation, the 2018-2020 moratorium in Ordinances 5302 and 5303 exempted "replacement wells," i.e., wells drilled to replace the water supply previously obtained from wells that have failed due to seawater intrusion or structural collapse. (Monterey County 2018a [Ordinance 5302, Section 5.A.4 and 5]; see MCWRA 2017, p. 45.) Thus, the County continued to permit Deep Aquifer wells during the moratorium as long as they were considered replacement wells. (MCWRA 2020, p. 29.) Indeed, as the moratorium was about to lapse in May 2020, MCWRA found that exemption for replacement wells had actually increased well construction in the Deep Aquifers above the previous rate of well construction.

> The exemption for replacement wells has brought about an increase in the number of wells installed in the Deep Aquifers on an annual basis. Prior to approval of Ordinance No. 5302, typically one or two wells were installed in the Deep Aquifers in a given year. Prior to 2006, many years had no new Deep Aquifers wells being drilled. In comparison, four new wells were installed in the Deep Aquifers in 2018: two replacement wells and two wells that were permitted prior to approval of Ordinance No. 5302. In 2019, four replacement wells were drilled in the Deep Aquifers (Figure 14) and so far in 2020, one replacement well has been drilled in the Deep Aquifers.

(MCWRA 2020, p. 29.)

In its May 2020 report to the Monterey County Board of Supervisors, issued just as the two-year moratorium was set to expire, MCWRA recommended continuing the Ordinance's restrictions, *and also prohibiting replacement wells*. (MCWRA 2020, p. 6.) The report noted the existence of the "previously unseen phenomenon" of seawater intrusion via vertical migration from the 180-Foot Aquifer to the 400-Foot Aquifer. (*Id.*, p. 1; see *id.* pp. 15.) The report explains that the "downward groundwater gradient between the 180-Foot Aquifer and 400-Foot Aquifer . . . acts as a driving force for vertical migration or inter-aquifer seawater intrusion." (*Id.*, p. 25.) This finding is consistent with earlier warnings that increased pumping of the Deep Aquifers *also* creates a downward gradient that may induce seawater intrusion into the upper aquifers. (See, e.g., MCWRA 2017, p. 54; WRIME 2003, pp. 4-7, 4-11 to 4-12.) MCWRA's 2020 report also documented at least one case of vertical migration of contaminated groundwater to the Deep Aquifer. (*Id.*, p. 31.)

Indeed, MCWRA's 2020 report found that "[i]ncreasing groundwater pumping in the Deep Aquifers will likely result in increased leakage from overlying aquifers with impaired groundwater." (*Id.*, p. 35.) And the report noted that replacement wells are in fact resulting in substantially increased Deep Aquifer pumping:

> As discussed in Section 4.3, eleven replacement wells have been permitted for installation in the Deep Aquifers; seven of these have been constructed as of April 2020. All eleven replacement wells are proposed for agricultural irrigation use. . .. If all eleven replacement wells were to pump an equivalent annual volume of groundwater from the Deep Aquifers as the wells they are replacing in the 400-Foot Aquifer, as most applicants have indicated is their intention, an additional 2,400 acre-feet per year of groundwater would be extracted from the Deep Aquifers (Figure 19). This added pumping would be an increase of 23% over the 2019 annual extractions from the Deep Aquifers. Additionally, there are two wells in the Deep Aquifers that were permitted prior to passage of Ordinance No. 5302 that are also not yet operational, but which will also contribute to increasing future groundwater extractions from the Deep Aquifers once they are brought into production.

(MCWRA 2020, p. 34.)

MCWRA's 2020 report recommended that the prohibitions continue until such time as the Deep Aquifers can be studied to determine its sustainable yield. (MCWRA 2020 pp. 26-27.) MCWRA explained that the conditions described in the Findings and Declarations of Ordinance Nos. 5302 and 5303, which supported the moratorium adoption, continue to exist and worsen, and thus continue to pose an immediate threat to the public peace, health and safety. MCWRA's findings in support of its recommendation to ban new Deep Aquifer wells, including new replacement wells include the following:

- "Wells are being installed in the Deep Aquifers at an increasing rate through use of the exemption for replacement wells allowed by Ordinances No. 5302 and No. 5303.
- "Groundwater extractions from the Deep Aquifers have increased 21% since the 2017 Recommendations report was released.
- "Extractions from the Deep Aquifers are expected to increase an additional 23% over 2019 extractions once all replacement wells that have been permitted thus far become operational.
- "Isotope analysis of water from the Deep Aquifers indicates that it is not derived from recent recharge (Hanson et al., 2002). Though stored groundwater may not be the primary source of current extractions in the Deep Aquifers, continued pumping of this old water represents mining of a groundwater resource.
- "There continues to be a scant amount of data on many facets of the Deep Aquifers geologic, hydrologic, and geographic properties. With the addition of new agencies that will be managing aspects of the Deep Aquifers, a comprehensive understanding of the Deep Aquifers is essential for near-term decision making and long-term water resources planning."

(MCWRA 2020, p. 37.) Despite MCWRA's recommendation to extend the moratorium *and* to prohibit replacement wells, the Board of Supervisors allowed the moratorium to lapse at their May 19, 2020 meeting. (Monterey County, 2020b [Board Order].)

With the May 2020 lapse of the moratorium, the County was able to process applications to permit Deep Aquifer wells and began doing so. The County briefly suspended new well permitting from August 2020 to December 2020 when the California Supreme Court held in *Protecting Our Water and Environmental Resources v. County of Stanislaus* (2020) 10 Cal.5th 479, 497 that well permits are not automatically exempt from CEQA review as "ministerial" actions. (Monterey County, 2020a [Ordinance 5339].) However, that 90-day moratorium continued to allow issuance of replacement well permits. (*Id.*) And that 90-day moratorium was allowed to lapse in December 2020. The County continues to issue Deep Aquifer replacement well permits and to do so without any CEQA review, relying on CEQA's exemption for "emergency" projects.

As of May 2021, 57 total wells have been installed in the Deep Aquifers, of which 25 were installed in the past 10 years, 14 in the past three years, and 5 in 2020. (MCWRA 2021, pp. 1, 4 [Figure 1].) As noted, MCWRA has concluded that the increased pumping of Deep Aquifer wells has been lowering Deep Aquifer groundwater levels since 2014, increasing the vertical gradient between the Deep Aquiver and the overlying 400-Foot Aquifer, and inducing migration of contaminated groundwater into the Deep Aquifers. (MCWRA 2020, pp. 31, 35.)

D. Neither the County nor SVGBGSA has commenced or funded the Deep Aquifer study recommended over three years ago.

As of May 2020, two years after the moratorium that was enacted to enable the County to study the Deep Aquifer, MCWRA reported that no funding had yet been identified for a Deep Aquifer study. (MCWRA 2020, p. 35.) As of March 21, 2021, neither the County of Monterey nor the SVGBGSA had actually funded, much less commenced, the Deep Aquifer study recommended by MCWRA in October 2017, over three years earlier. (SVGBGSA 2021, p. 7 ["Time to start the conversation on how to get this done!"].)

E. The 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan provisions to protect the Deep Aquifers have not been implemented.

The GSP does not adequately assess or address the Deep Aquifers because, it acknowledges, there is insufficient data. The GSP acknowledges that the "hydrostratigraphy, vertical and horizontal extents, and potential recharge areas for the Deep Aquifers are poorly known." (SVGBGSA 2020, p. 4-29.) Accordingly, it defers analysis to the future:

- "An aquifer properties assessment and deep aquifers investigation will be conducted to address key data gaps." (*Id.*, p. ES-16; see p. 10-5.)
- "MCWRA does not produce groundwater elevation maps of the Deep Aquifers. Insufficient data currently exist to map flow directions and groundwater elevations in the Deep Aquifers. This is a data gap that will be addressed in GSP implementation." (*Id.*, p. 5-14.)

Absent this data, the minimum thresholds were not meaningfully devised to protect the Deep Aquifer. For example, Table 8-2 sets the minimum threshold for chronic lowering of groundwater levels at -10 feet for the *single* Deep Aquifer well for which the GSP reports data. (*Id.*, p. 8-15.) But this minimum threshold has already likely been exceeded because MCWRA found that Deep Aquifer groundwater levels have been declining since 2014. (MCWRA 2020, p. 31.) Or, for example, the minimum threshold for seawater intrusion was set based on MCWRA's mapping of the 500 mg/l chloride concentration seawater intrusion front. (SVGBGSA 2020, p. 8-32.) But MCWRA has not mapped or measured seawater intrusion in the Deep Aquifers. So, the GSP arbitrarily set the minimum threshold for seawater intrusion in the Deep Aquifers at the "line defined by

Highway 1." (*Id.*, p. 8-6.) Since there is a no reported direct ocean connection to the Deep Aquifer, setting the minimum threshold for saline contamination as if seawater would advance from the ocean is meaningless. The acknowledged path of saline contamination that puts the Deep Aquifer at risk is vertical migration from upper aquifers. (*Id.*, pp. 5-42, 9-20.)

The only management action identified in the GSP to address risks to the Deep Aquifer is "Priority Management Action 5: Support and Strengthen Monterey County Restrictions on Additional Wells in the Deep Aquifers," which was proposed in January 2020 when the County still had a moratorium on Deep Aquifer wells. Under this management action, SVGBGSA was supposed to ensure that the moratorium was extended until the Deep Aquifer sustainable yield is determined:

> SVBGSA will work with Monterey County to extend this ordinance to prevent any new wells from being drilled into the Deep Aquifers until more information is known about the Deep Aquifers' sustainable yield. MCWRA plans to complete this study of the Deep Aquifers over the next three years, when funding becomes available. SVBGSA will comment on the MCWRA study of the Deep Aquifers to ensure that the study and the resulting permanent regulations will promote groundwater sustainability as defined in this GSP.

(SVGBGSA 2020, p. 9-19.) The plan provides that "SVBGSA will support extension of Ordinance 5302 *immediately*. Deep Aquifers pumping will only be allowed *after* MCWRA completes its study of the Deep Aquifers' sustainable yield." (*Id.*, p. 9-20, emphasis added.) The plan notes that SVGBGSA has the authority to halt extractions from the Deep Aquifer:

> California Water Code §10726.4 (a)(2) provides GSAs the authorities to control groundwater extractions by regulating, limiting, or suspending extractions from individual groundwater wells or extractions from groundwater wells in the aggregate (CWC, 2014).

(*Id.* at 9-20.)

The purported benefits of this management action were to be improved groundwater levels and groundwater storage and reduction of vertical migration of impaired groundwater from overlying aquifers. (*Id.* pp. 9-19 to 9-20.)

As noted, the County has allowed the moratorium to lapse and continues to permit Deep Aquifer wells. However, the SVGBGSA has not exercised its acknowledged authority to restrict Deep Aquifer pumping. The promised study of sustainable yield has neither commenced nor been funded. Groundwater levels in the Deep Aquifers continue to decline and the vertical migration of impaired groundwater from overlying aquifers is in fact occurring.

The SVGBGSA must now take action to implement the GSP by restricting pumping from Deep Aquifer wells pending completion of the Deep Aquifers study. Although the SVGBGSA cannot deny a well construction permit, it can restrict or ban pumping. (Water Code, §10726.4 (a)(2).) Thus, SVGBGSA should bar pumping from any new wells in the Deep Aquifers, which will have the same practical effect as would a County moratorium on well permits.

If the SVGBGSA is unwilling to take action to enforce its GSP, the DWR should use its authority to ensure that an adopted GSP "is being implemented in a manner that will likely achieve the sustainability goal for the basin." (23 CCR § 355.6(a).) Although DWR *must* evaluate GSP implementation every five years, DWR "*may* evaluate the implementation of a Plan *at any time* to determine whether the Plan is consistent with the objectives of the Act and in substantial compliance with this Subchapter." (23 CCR § 355.6(f), emphasis added.)

In determining whether GSP implementation is consistent with SGMA, DWR is charged to consider whether "the Agency is implementing projects and management actions consistent with the Plan." (23 CCR § 355.6(c)(2).) Here, it is clear that the continued permitting and construction of new wells in the Deep Aquifers is not consistent with the GSP, which calls for a continued moratorium on such wells. Because the SVGBGSA has determined that a moratorium is needed to protect the Deep Aquifers pending completion of a study to determine sustainable yield, the failure to complete the study and to halt new wells constitutes a failure to protect and manage the aquifers using the "best available science." (23 CCR § 355.4(b)(1).)

Neither the SVGBGSA nor DWR should wait to take action. Continued investments in very expensive Deep Aquifer wells is damaging the aquifer and creating expectations of continued water use that are very likely unsustainable and imprudent.

Yours sincerely,

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

John Farrow

JHF:hs

Cc: Donna Meyers, SVGBGSA, meyersd@svbgsa.org
Gary Petersen, SVGBGSA, peterseng@svbgsa.org

References

1. Brown and Caldwell, State of the Salinas River Groundwater Basin Report, January 2015, https://www.co.monterey.ca.us/home/showpublisheddocument/19586/636232667593230000

2. Geoscience, Protective Elevations to Control Sea Water Intrusion in the Salinas Valley, November 2019, https://www.co.monterey.ca.us/home/showdocument?id=19642

3. Marina Coast Water District (MCWD), Urban Water Management Plan, June 2016, https://www.mcwd.org/docs/engr_files/MCWD_2015_UWMP_Final.pdf

4. Monterey County, Ordinance 5302, May 2018, https://www.co.monterey.ca.us/home/showpublisheddocument/76746/636900588655270000

5. Monterey County Ordinance 5303, June 2018, https://www.co.monterey.ca.us/home/showpublisheddocument/87849/637197092177000000

6. Monterey County Ordinance 5339, September 2020, https://library.municode.com/ca/monterey_county/ordinances/code_of_ordinances?nodeId=1045133

7. Monterey County, Board Order, Legistar File ID No. ORD 20-006 Agenda Item No. 14.1 , May 19, 2020, https://monterey.legistar.com/LegislationDetail.aspx?ID=4539196&GUID=FADC2E12-CE4B-4FE4-9B0C-753EE1E4D19C&Options=&Search= download order at https://monterey.legistar.com/View.ashx?M=F&ID=8562927&GUID=A553DB0F-8F19-445B-B3B8-55963FE7C7EE

8. Monterey County Director of Health, Board Report, Legistar File Number ORD 20-006, May 19, 2020, https://monterey.legistar.com/View.ashx?M=F&ID=8440192&GUID=82376A3E-8C46-417B-8ABB-B0FE8785FDA9

9. Monterey County Water Resources Agency (MCWRA), Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin, Oct. 2017, https://www.co.monterey.ca.us/home/showdocument?id=57396

10. Monterey County Water Resources Agency (MCWRA), Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater

Basin: 2020 Update, May 2020, p. 35, https://www.co.monterey.ca.us/home/showdocument?id=90578.

11. Monterey County Water Resources Agency (MCWRA), Well Permit Application Activities Update, prepared for May 17, 2021 MCWRA Board of Directors meeting, https://monterey.legistar.com/View.ashx?M=F&ID=9381226&GUID=34ED34CD-3A39-4851-87A3-298BE70D383C

12. Salinas Valley Groundwater Basin Groundwater Sustainability Agency (SVGBGSA), Salinas Valley Groundwater Basin 180/400-Foot Aquifer Subbasin Groundwater Sustainability Plan, January 9, 2020, https://svbgsa.org/wp-content/uploads/2020/04/SVBGSA-Combined-GSP-2020-0123-rev-032520-1.pdf

13. Salinas Valley Groundwater Basin Groundwater Sustainability Agency (SVGBGSA), Seawater Intrusion Group Meeting Presentation, March 21, 2021, https://svbgsa.org/wp-content/uploads/2021/03/3-22-21-SWIG-Presentation.pdf

14. WRIME, Deep Aquifer Investigative Study, May 2003, pdf available upon request

811 El Capitan Way, Suite 130, San Luis Obispo, CA 93401
Ph. (805) 787-0326 / F. (805) 692-6931

June 8, 2021

Mr. Eric Tynan
Castroville Community Services District
11499 Geil Street
Castroville CA 95012

Subject: **Proposal for Professional Engineering Services – Emergency Deep Aquifer Supply and Storage Tank Project**

Dear Mr. Tynan:

Thank you for the opportunity to submit this proposal for Professional Engineering Services for planning and draft design document preparation for the Emergency Deep Aquifer Supply and Storage Tank Project (Project) for the Castroville Community Services District (District). MNS was selected for this work based on our on-call engineering proposal dated November 9, 2020.

This proposal is based on our communication with the District and the Grant Agreement between the State of California (Department of Water Resources) and Monterey County Water Resources Agency Agreement Number 4600013799 Proposition 1 Round 1 Integrated Regional Water Management (IRWM) Implementation Grant (Grant). MNS Engineers, Inc. (MNS) offers our qualified team to provide professional services for this Project.

Project Understanding

The Castroville Community Services District provides water and sewer service to all of Castroville as well as locally defined areas extending north to Moss Landing and east to Moro Cojo. The District's water system infrastructure includes ground water wells, pipelines, pump stations, and storage reservoirs. The District's Well Site No. 4 includes a ground water well, a 640,000 gallon above ground steel storage reservoir, and a discharge booster pump station. The design of the Project will be advanced to 30% complete level, and bridging documents prepared in support of procuring the services of a design-build team to finalize the design and construct the project.

The purpose of the Emergency Deep Aquifer Supply and Storage Tank Project is to provide an additional safe and reliable water supply for the District. The project includes the planning, design and construction of three components: (1) deep aquifer well (1,400 feet), (2) arsenic treatment system, and (3) a welded steel storage tank (640,000 gallons), as well as additional improvements needed to develop a complete and functional system on a municipal site. The District will construct a potable water storage tank at the Well No. 4 site to provide approximately 640,000 gallons of additional storage, operational redundancy, regulate water temperature, and increase water availability for fire protection. The Project will provide approximately 300 acre-feet per year (AFY) of clean drinking water to the community of Castroville and increase water supply reliability. The Project is being funded through agreement 4600013799 for the award of $3,462,861 of Round 1 Proposition 1 IRWM funds to the Greater Monterey County IRWM Program. Of this amount, the District's share of the award is $395,000 for the Project. The Department of Water Resources (DWR) is the administrator of the funds through its South Central Region Office in Fresno.

The preliminary 30% design of subsurface and above ground equipment for the proposed deep aquifer well, including well pump, pump shaft, pump motor, and wellhead treatment (if required), are included in this Proposal. The hydrogeologic evaluation, final design and installation of the proposed deep aquifer well is not included in this Proposal and will be completed by others. According to the District, water extracted from existing water wells screened in the same geologic formation as the proposed deep aquifer well, has concentrations of arsenic above the safe drinking water standards.

The District previously retained the services of MNS to plan for piping modifications at the Reservoir No. 4 site to allow water from another site to be able to fill the existing and proposed reservoirs. The Project design will incorporate these recommended improvements.

Project Scope

MNS has tailored a scope of work to provide engineering services for the Project. A description of tasks and responsibilities are described below.

Task 1 – Project Management, QA/QC, and Meetings

This task includes project management, quality assurance/quality control (QA/QC), and meetings associated with the Project.

Subtask 1.1 – Project Management

The Project Manager, Paul Greenway, will provide ongoing coordination of the project team including the District and the internal project team. Paul will monitor the budget and serve as the main point of contact with the District. Regular phone calls and e-mail updates will be sent from the Project Manager to the District's Project Manager to keep coordination open and up-to-date. The Project Manager will submit monthly invoices with all supporting documentation in a format acceptable to District.

The Project Manager is responsible for ensuring all deliverable deadlines are met, all internal quality control reviews are completed, and the final products meet the expectations of District.

Subtask 1.2 – Quality Assurance/Quality Control

In accordance with MNS company policy, all deliverables, calculations, recommendations, and other documentation will be reviewed by an experienced engineer, not otherwise associated with the project, prior to submittal to District. Documents will be reviewed to ensure technical excellence, the goals and expectations of District are being met, and conformance with applicable design checklists and standards. For this project, all deliverables and other items requiring quality control reviews will be reviewed by Tyler Hunt, PE.

Subtask 1.3 – Meetings

Over the course of the Project, MNS will facilitate and lead meetings and conference calls as required to move the Project forward and ensure District is informed and in concurrence with the progress of the project. MNS will develop a meeting agenda, and will submit meeting minutes for the Project Kick-off Meeting to the District within five business days. We anticipate two formal meetings, which will occur virtually:

- Project Kick-off Meeting
- Draft 30% Design Review Meeting

In addition, we have budgeted for four additional virtual meetings with District staff to discuss and gain concurrence on project progress, as well as one site visit.

The MNS Project Manager and the Lead Engineer will attend each meeting.

Task 2 – Reporting

MNS will prepare quarterly progress reports and quarterly invoices to submit to DWR in accordance with requirements set forth in the Proposition 1 2019 Guidelines and Agreement 4600013799. Quarterly reports will be submitted to DWR's Project Manager through the DWR Grant Review and Tracking System (GRanTS). MNS will prepare the Project Completion Report and Grant Completion Report as provided in Exhibits A and F of the Agreement.

Task 3 – Land Purchase

No scope is included for this task. The land purchase will be completed by others.

Task 4 – Feasibility Studies

Project Feasibility Studies were completed as part of the project development process. Preliminary studies and work required to support project design and California Environmental Quality Act (CEQA)/permitting included a Hydrogeologic Evaluation, Topographic and Boundary Survey, and Geotechnical Investigation. The Hydrogeologic Evaluation is not included in this Scope and will be completed by others.

Subtask 4.1 Topographic and Boundary Survey

MNS will perform ground surveying and mapping for the tank and well #6 site located in Castroville. Ground surveying will include the District property known as APN 133-491-048 and a portion of the easterly 60' of the neighboring property known as APN 133-491-021 (Approx. 37,000 Sq. Ft.). The mapping will be tied to the NAD83 datum and NAVD88 datum based on local benchmarks. The scope of work will include the following items:

- Hardscape, structures, walls, fences, trees (6" in diam. and above)
- Observable utilities

MNS will prepare a topographic/utility base map in AutoCAD at a scale of 1" = 20' with 1' contour intervals.

A record boundary will be prepared based on a best fit of field located monuments. This scope of work does not include title report acquisition or easement retracement.

Subtask 4.2 Geotechnical Investigation

Our subconsultant, Yeh and Associates, Inc. (Yeh), will evaluate the subsurface geologic and geotechnical conditions in the vicinity of the Project site and provide geotechnical recommendations for design and construction of the new tank and facilities associated with this project. Yeh will conduct a review of available existing data, conduct field exploration, laboratory analysis, and prepare a draft and final geotechnical report. Yeh's proposal for geotechnical services is attached to this Proposal.

Task 5 – CEQA Documentation

Our subconsultant, Rincon Consultants, Inc. (Rincon), will complete environmental review pursuant to CEQA. We propose to perform additional studies and reports to satisfy the requirements of a CEQA-Plus evaluation to meet applicable criteria for federal funding sources. Rincon's proposal for preparing necessary environmental documentation and studies is attached to this Proposal.

Task 6 – Permitting

MNS will conduct a preliminary review with the State Water Resources Control Board (SWRCB), to review 30% design documents. MNS will discuss the requirements of amending the existing Domestic Water Supply Permit, and update the 30% design documents as appropriate to address any concerns and streamline the permitting process.

Other permits are anticipated to be required; MNS assumes these permits will be completed by others, or as future work by MNS. We anticipate these future permits will include:

- SWRCB Domestic Water Supply Permit Amendment
- County of Monterey Grading Permit
- County of Monterey Use Permit

- Post Construction Stormwater Requirements
- Permit to operate/Permit to Construct

Task 7 – 30% Design

MNS will prepare and submit Draft and Revised 30% design plans and opinion of probable cost of construction. The design drawings will be developed using the topographic and boundary survey completed in Task 4.1, supplemented with prior work by MNS, and as-built record drawings provided by the District. Drawings will be prepared in AutoCAD Civil 3D 2021. For budgeting, we have assumed the Project will be based on one welded steel tank constructed on grade at the existing Well No. 4 site. The area of disturbance is less than one acre; as a result, a Stormwater Pollution Prevention Plan (SWPPP) is not required. Erosion control requirements will be included, as well as conceptual post-construction stormwater improvements.

Conceptual modifications to the District's SCADA system and control programming will be included in the 30% plans.

Our design efforts will be supported by our subcontractor, SSG Structural Engineers, LLP (SSG), for structural design services, and Fehr Engineering (Fehr), for electrical engineering support services. Proposals for services to be provided by SSG and Fehr are provided as attachments to this Proposal.

The following shows the anticipated sheet list for the Project.

Sheet	Sheet No.	Description
1	G-1	Title Sheet, Vicinity Map, Location Map, and Sheet Index
2	G-2	General and Civil Notes and Existing Site Plan
3	C-1	Demolition Plan
4	C-2	Site Plan
5	C-3	Grading and Drainage Plan
6	C-4	Site Piping Plan
7	C-5	Site Piping Details 1
8	C-6	Site Piping Details 2
9	C-7	640,000 Gallon Tank Plan and Sections
10	C-8	640,000 Gallon Tank Details 1
11	C-9	Hydropneumatic Tank Plan and Sections
12	C-10	Arsenic Treatment System
13	C-11	Arsenic Treatment System Details
14	C-12	Civil Details 1
15	C-13	Civil Details 2
16	C-14	Stormwater BMP Plan and Details
17	S-1	Structural Notes and Special Inspections
18	S-2	Tank Structural Plan and Sections

Sheet	Sheet No.	Description
17	S-3	Tank Structural Details
18	S-4	Hydropneumatic Tank Structural Plan and Details
19	S-5	Arsenic Treatment System Structural Plan and Details
20	S-6	Back-up Generator Structural Plan and Details
21	E-1	Electrical Notes
22	E-2	Electrical Site Plan
23	E-3	Single Line Diagram and Lighting Schedule
24	I-1	Instrumentation Notes
25	I-2	Process and Instrumentation Diagram

Following submittal of the draft 30% design, MNS will lead a design review meeting with District staff to discuss District comments and gain a consensus on design decisions to advance the design to submit a revised 30% design.

Task 8 – Project Monitoring Plan

MNS will prepare a Project Monitoring Plan (Plan) to document the future success of the Project. The Plan will be based on the guidance provided in Exhibit L of the draft agreement with DWR, and will incorporate a Post-Performance Monitoring Report as described in Exhibit F of the draft agreement. The Plan will be developed as a Technical Memorandum, which will be submitted to the District as a draft document for review and approval. MNS will finalize the report after receipt of any comments from the District.

Within ninety (90) calendar days after the first operational year of the Project has elapsed, MNS will prepare the first of three annual Post Performance Reports based on the results of data collected through implementation of the Project Monitoring Plan. We have included budget to complete two additional annual Post Performance Reports in year 2 and 3 after project completion.

Task 9 – Contract Services

Following completion of the 30% design documents, and appropriation of construction funds, MNS will support the District to procure the services of a design-build team to complete the design of the Project and construct the proposed improvements. Work under this task will not be completed without separate authorization. Services to be provide under this task include:

- Study and Report Phase:
  - Prepare a report which will, as appropriate, contain: a summary description of Project, Owner's objectives for the Project, recommendations of design-build solicitation procedures, recommendations for the composition of a Selection Panel, outline of a Request for Design-Build Qualifications (RFQ), outline of a Request for Design-Build Proposals (RFP), and design-build competition schedule.
- RFQ and Shortlisting Phase:
  - Announcement and/or Advertisement of Intent to Request Design-Build Qualifications.
  - Request for Design-Build Qualifications (RFQ), including selection criteria for Design-Builder shortlisting.
  - Announcement mailing list.
  - Information to assist Selection Panel in shortlisting process.
  - Any Addenda required to the RFQ.
  - Publish Advertisement: Request for Design-Build Qualifications.

  - Distribute RFQ to all requesting same and to Owner's project staff and maintain list of RFQ holders.
  - Conduct pre-submittal meeting(s) for interested parties, if appropriate.
  - Respond to questions from interested parties and, after review and approval by Owner, publish answers in addenda to RFQ.
  - Summarize the information contained in the qualification statements and distribute to Selection Panel and Owner.
  - Assist Selection Panel in evaluation of qualifications.
  - Assist Selection Panel in presenting recommendations to Owner.
  - Notify all respondents of the Owner's actions on the Selection Panel's recommendations for shortlisting.
- RFP Preparation Phase
  - Prepare instructions to proposers, including proposal evaluation and selection criteria.
  - Prepare Proposal Form.
  - Prepare Agreement Form.
  - Prepare Bond Forms (if required).
  - Prepare General and Special Conditions of the Design-Build Contract.
  - Prepare Program of Facility Requirements.
  - Prepare Space Standards and Environmental Requirements.
  - Prepare Performance Standards.
  - Prepare Materials to assist Selection Panel in proposal selection.
  - Prepare Addenda to the RFP.
- RFP and Proposal Phase
  - Distribute RFP Document and attachments to all proposers to Owner's project staff and Selection Panelists, and maintain list of RFQ holders.
  - Conduct pre-proposal meeting(s) for proposers.
  - Respond to questions from proposers and, after review and approval by Owner, publish answers in addenda to RFP.
  - Assist the Owner to receive proposals, determine and certify if they meet the deadline and the minimum submittal.
- Design Build Team Selection Phase
  - Distribute copies of the proposals to the Selection Panel and the Owner.
  - Examine each proposal for compliance with the minimum requirements of the RFP.
  - Assist the Selection Panel in evaluation of the design-build proposals based on the selection criteria published in and selection of a winning proposal for recommendation to Owner.
  - Note the Selection Panel deliberations and record their votes for inclusion in a written Final Report of the Selection Panel.
  - Assist the Selection Panel in presenting the Panel's recommendation to Owner.
  - Assist the Owner to take appropriate action on the recommendation.
  - Assist the Owner and the Design-Builder to complete and execute the design-build contract, including the development of the Basis of Design Documents, the GMP Exhibit, if applicable, and the clarification and documentation of appropriate sections of the Design-Builder's proposal, if necessary.
  - Assist in coordinating the award of contract and issuance of notice to proceed.

Task 10 – Construction Administration

No support services for Task 10 are included in this proposal.

Deliverables

The following deliverables will be submitted to the District over the course of this Project:

- Meeting Agendas and Meeting Minutes

- Quarterly Invoices, Quarterly Progress Reports, Project Completion Report, Grant Completion Report, Post Performance Reports
- Draft and Final Geotechnical Investigation Report
- CEQA Categorical Exemption and Supporting Documents
- Draft 30% Design Documents
- Final 30% Design Documents
- Project Monitoring Plan
- Post-Performance Reports (3)
- Design-Build Procurement Documents

Project Team

MNS has assembled a qualified team with the skills and expertise to bring this Project to completion in-line with the District's goals. Nick Panofsky, PE will lead the team as Project Manager, supported by Sean Packard, PE, as Senior Project Engineer, Albert Wong, PE, as Senior Control Systems Engineer, and Tyler Hunt, PE, will provide QA/QC reviews. For Electrical design, Thomas Pinkerton, PE with Fehr Engineering Company will provide support. Michael Parolini, PE, SE, with SSG Structural Engineers, will provide structural engineering services.

Compensation

MNS proposes to perform the services described herein for an estimated fee of **$287,827**. A breakdown by task is provided in the following table. A detailed fee proposal spreadsheet is available on request. All fees are in accordance with the MNS Standard Fee Schedule, also included as an attachment.

Task	Fee
Task 1 – Project Management, QA/QC, and Meetings	$34,170
Task 2 – Reporting	$17,760
Task 4 – Feasibility Studies	$35,154
Task 5 – CEQA	$40,703
Task 6 – Permitting	$2,800
Task 7 – Design	$105,800
Task 8 – Project Monitoring Plan	$16,220
Task 9 – Contract Services	$36,140
Total	**$288,747**

Schedule

We are prepared to meet or exceed the schedule provided in the following table, assuming a Notice to Proceed date of July 1, 2021.

Milestone	Date
Project Kickoff	Week of July 5, 2021
Topographic and Boundary Survey	July 12-30, 2021
Draft Geotechnical Report	September 30, 2021
Draft 30% Design Documents	November 26, 2021
District Review	2 Weeks
Final 30% Design Documents	January 7, 2022
CEQA Documents	March 25, 2022.

Closing

Thank you for the opportunity to submit this proposal. We are excited and look forward to working with the District. Please feel free to contact me at 805.592.2074 or npanofsky@mnsengineers.com, or Paul Greenway, at Paul@G7ei.com or 831.400.8964 with any questions you may have about our submittal. Thank you for your consideration.

Sincerely,
MNS Engineers, Inc.

Nick Panofsky, PE
Lead Engineer

Attachments:
Fee Schedule
Detailed Fee Spreadsheet
Yeh and Associated Proposal
Rincon Consultants Proposal
Fehr Engineering Proposal
SSG Proposal

CASTROVILLE COMMUNITY
SERVICES DISTRICT
From the desk of
Eric Tynan – General Manager
Phone (831) 633-2560

TO: Castroville CSD Board of Directors

DATE: July 20, 2021

Re: New Office Hours

RECOMMENDATION;
Permanently change office hours from 8:30 am till 4:45 pm M-F to open 8:30am -12:30pm, closed for lunch from 12:30 -1:30 and open from 1:30 to 4:45 M-F

SUMMARY:
After the armed robbery in 2018[1] the District Board mandated that the Office Staff would not be left unattended in the office due to safety concerns. In addition, currently it is necessary for field staff to augment Office Staff to cover lunches which is problematic when operations such as leak repair, vacations, sick leave ect… stress the Operations Staff's ability to complete its duty's
While the District office was closed for the covid pandemic it gave myself and the Staff a chance to revisit our hours of operations and how we could still provide great customer service while ensuring the safety of Staff and complete the field work in an efficient manner.

A test run
For the past several weeks the District office has been closed for lunch from 12:30 till 1:30 and the phones answered by the recorder. The Office Staff seems generally happier and appreciates not juggling overlapping lunches and trying to see who can cover when overlapping lunches don't work.
Also, by closing the office it greatly reduces the need for anyone else other than Office Staff from getting involved the till or billing and cash handling which is always a concern of our auditors.
Finally, we have not had any negative comments from our customers.

In conclusion,

- Safety concerns of Staff and Board are addressed.
- No complaints from our customers.
- Better control of cash and billing issues.
- More efficient use of Operations time and talents

Respectfully submitted,

J.Eric Tynan

CASTROVILLE COMMUNITY
SERVICES DISTRICT
From the desk of
Eric Tynan – General Manager
Phone (831) 633-2560

TO: Castroville CSD Board of Directors

DATE: July 20, 2021

Re: Well #3 Off-line due to elevated Chlorides, TDS & Specific Conductance

RECOMMENDATION;
Proceed with destruction of Well #3 due to elevated levels exceeding Chloride, TDS and Specific Conductance in Well #3 and consider appropriate response.

SUMMARY:
Well # 3 provided about 22% of CCSD's water supply.
In May of 2019, Monterey Bay Analytical Services notified us that the Chloride levels in Well #3 had jumped to 733 Mg/L. This is well past the secondary standard MCL of 500 Mg/L. The District immediately notified the State Water Resource Control Board-Division of Drinking Water of the change and they ordered the well to be put on standby status and to only to be used in a water emergency or shortage. In 2019, after installing a drop pipe to pull from lower in the well column, the constituents dropped low enough to continue to use well #3 but have recently risen again above allowable limits.

A little History
Wells #2 and #3 both exhibited high chlorides in the past. Well #2 was sleeved in 2006 and its Chlorides dropped from over 500 Mg/L to 63 Mg/L and have stayed there. Well #3 was sleeved in 2009 and the Chlorides dropped from over 500 Mg/L to the low 300's before slowly rising again to finally exceed the secondary limit of 500 Mg/L.

I've researched several options including desalting the well but concluded the odds that sea water intrusion would continue to increase the concentration of the brine until it would exceed allowable sewer discharge and also the District would need to return the $395,000 grant for emergency water supply for proposed well #6

In conclusion,
- CCSD has agreed for MCWRA to destroy Well #3 .
- Working diligently to complete purchase of land next to well #4 for a new Deep Well.
- Continue to pursue additional grant funding.
- Complete permitting and construction of Well #6

Respectfully submitted,

J.Eric Tynan

STATE OF CALIFORNIA
APPLICATION
FOR
DOMESTIC WATER SUPPLY PERMIT AMENDMENT
FROM

Applicant: CASTROVILLE COMMUNITY SERVICES DISTRICT
(Enter the name of legal owner, person(s) or organization)

Address: 11499 GEIL ST. CASTROVILLE, CA. 95012

System Name: CASTROVILLE COMMUNITY SERVICES DISTRICT

System Number: 2710005

TO: dwpdist05@waterboards.ca.gov
State Water Resources Control Board
Division of Drinking Water – Monterey District
1 Lower Ragsdale Dr., Bldg. 1, Suite 120
Monterey, CA 93940

Pursuant and subject to the requirements of the California Health and Safety Code, Division 104, Part 12, Chapter 4 (California Safe Drinking Water Act), Article 7, Section 116550, relating to changes requiring an amended permit, application is hereby made to amend an existing water supply permit to:

WELL #3, CASTROVILLE CSD

Abandone and destroy Well 3 by MCWRA

(Applicant must state specifically what is being applied for - whether to construct new works, make alterations or additions in works or sources, or change or modify treatment, etc)

I (We) declare under penalty of perjury that the statements on this application and on the accompanying attachments are correct to my (our) knowledge and that I (we) are acting under authority and direction of the responsible legal entity under whose name this application is made.

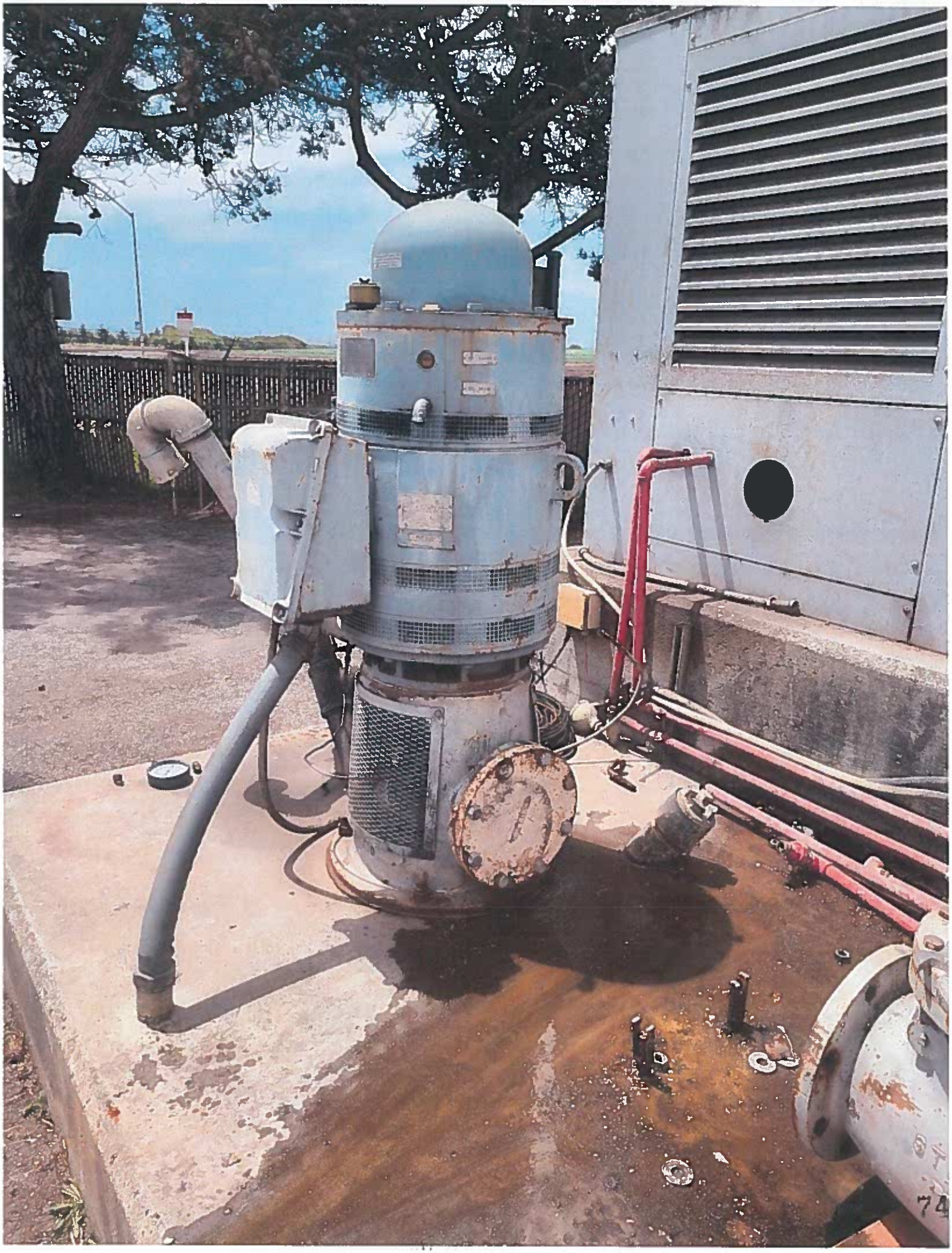
By: J. ERIC TYNAN

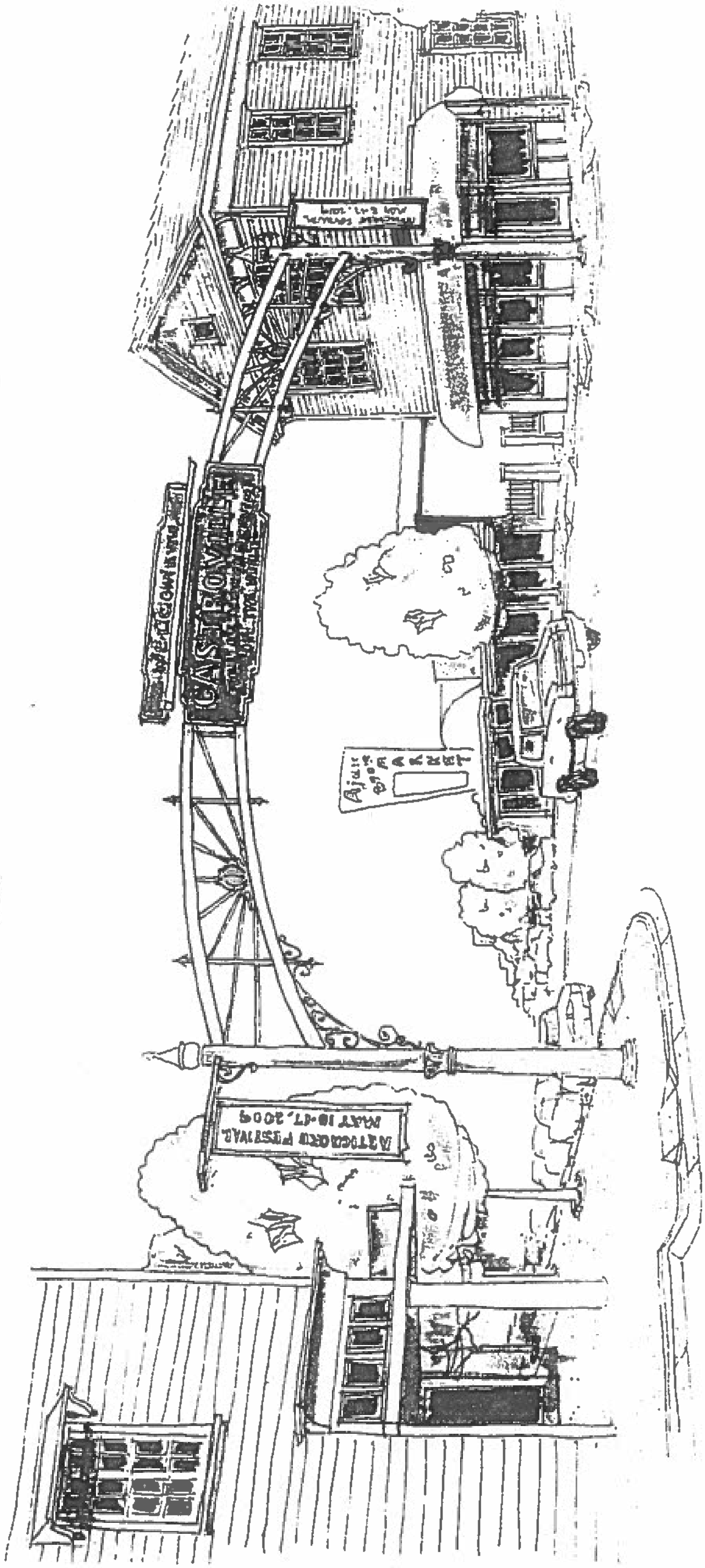
Title: GENSERAL MANAGER

Address: 11499 GEIL ST, CASTROVILLE, CA. 95012

Telephone: 831.235.0155

Dated: 6/17/2021

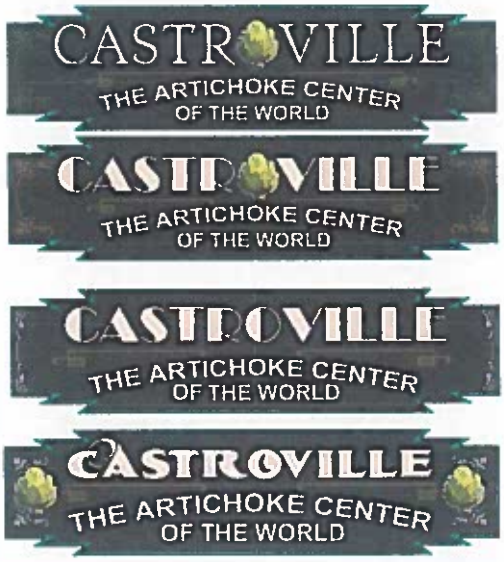



CASTROVILLE


Welcome To
CASTROVILLE
ARTICHOKE CENTER OF THE WORLD


CASTROVILLE
THE ARTICHOKE CENTER
OF THE WORLD


Welcome To
CASTROVILLE
ARTICHOKE CENTER OF THE WORLD


CASTROVILLE
THE ARTICHOKE CENTER
OF THE WORLD
CASTROVILLE
THE ARTICHOKE CENTER
OF THE WORLD
CASTROVILLE
THE ARTICHOKE CENTER
OF THE WORLD
CASTROVILLE
THE ARTICHOKE CENTER
OF THE WORLD


CASTROVILLE

United States Environmental Protection Agency

SCS Advanced Shared Services (/AWIA/Home/SCSHandoff)

Contact Us (/AWIA/Home/Contact)

America's Water Infrastructure Act (Sec. 2013(a)) / Risk and Resilience Assessment Certification Statement

I **JAMES TYNAN** hereby certify that **CASTROVILLE COMMUNITY SERVICES DISTRICT**, serving a population of **7100**, has conducted, reviewed, or reviewed and revised an assessment of the risks to, and resilience of, its system. This assessment included an assessment of:

- The risk to the system from malevolent acts and natural hazards;
- The resilience of the pipes and constructed conveyances, physical barriers, source water, water collection and intake, pretreatment, treatment, storage and distribution facilities, electronic, computer, or other automated systems (including the security of such systems) which are utilized by the system;
- The monitoring practices of the system;
- The financial infrastructure of the system;
- The use, storage, or handling of various chemicals by the system;
- The operation and maintenance of the system; and
- May include an evaluation of capital and operational needs for risk and resilience management for the system.

Date of certification: **06/25/2021**

The U.S. EPA and the authorized official signing this document agree that this certification may be signed electronically. The parties agree that the typed electronic signature that appears on this certification is the same as a handwritten signature for the purposes of validity, enforceability, and admissibility.

Once you have submitted your risk and resilience assessment certification, EPA will send an email acknowledging receipt of your certification. If you have any problems, please email us at dwresilience@epa.gov (mailto:dwresilience@epa.gov).

Certify now

Print this page

SHEET NUMBER TOTAL SHEETS

CASTROVILLE STREET IMPROVEMENTS
FROM MAIN STREET TO BLACKIE RD
AND CASTRO ST TO MERRITT ST
MORO COJO TO WOOD ST AND
GEIL ST TO McDOUGALL ST.

SUBMITTED BY: J. L. PASCUA, P.E.
DESIGN BY: JOSE LUIS GOMEZ — CHKD BY: X. X
DRAWN BY: JOSE LUIS GOMEZ — CHKD BY: X. X
SPECIFICATIONS WRITTEN BY: X. X. 00000 — CHKD BY: X. X
APPROVED, RECOMMENDED BY: TOM BONGUT, PE

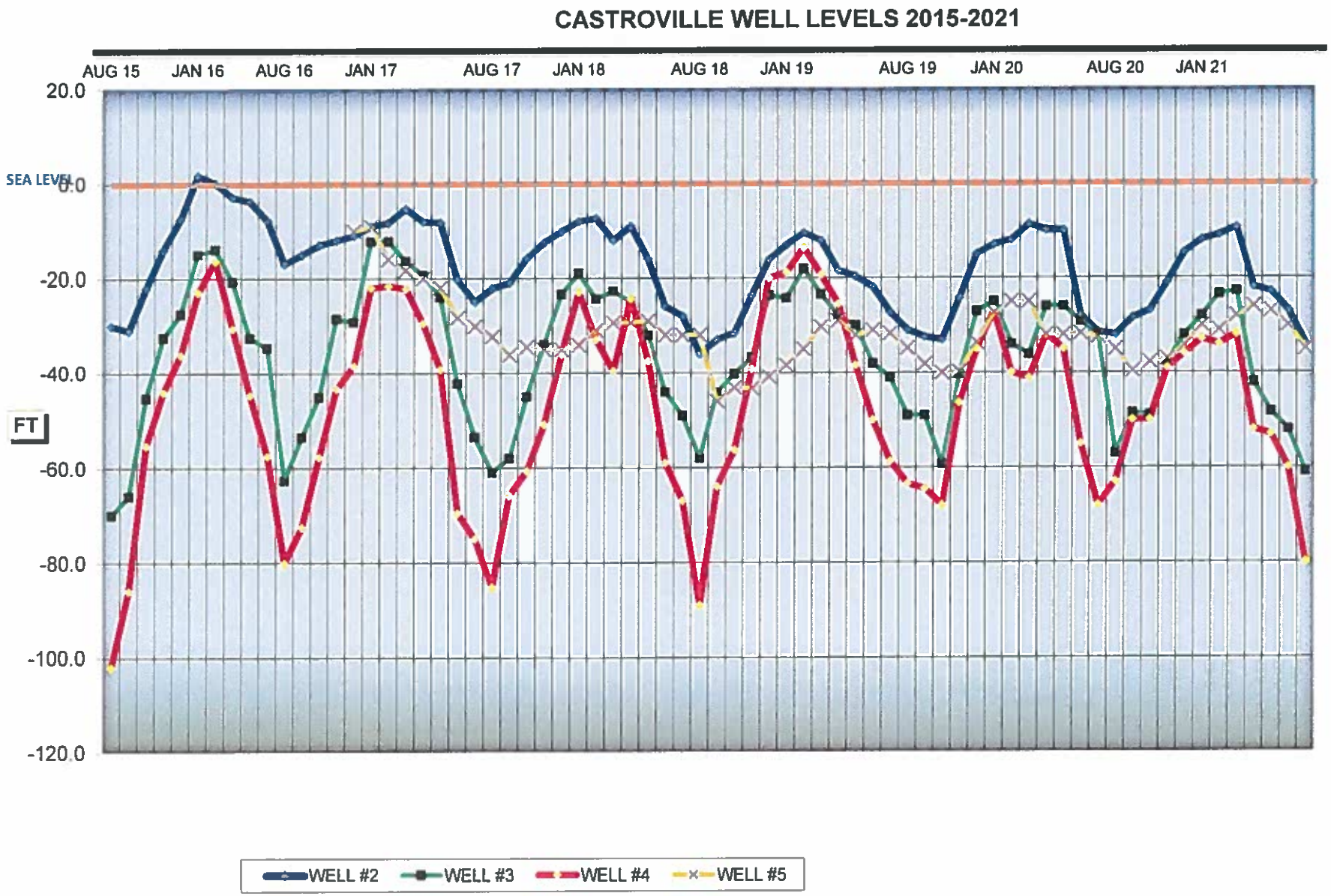
NO	DATE	REVISION	APPROVED

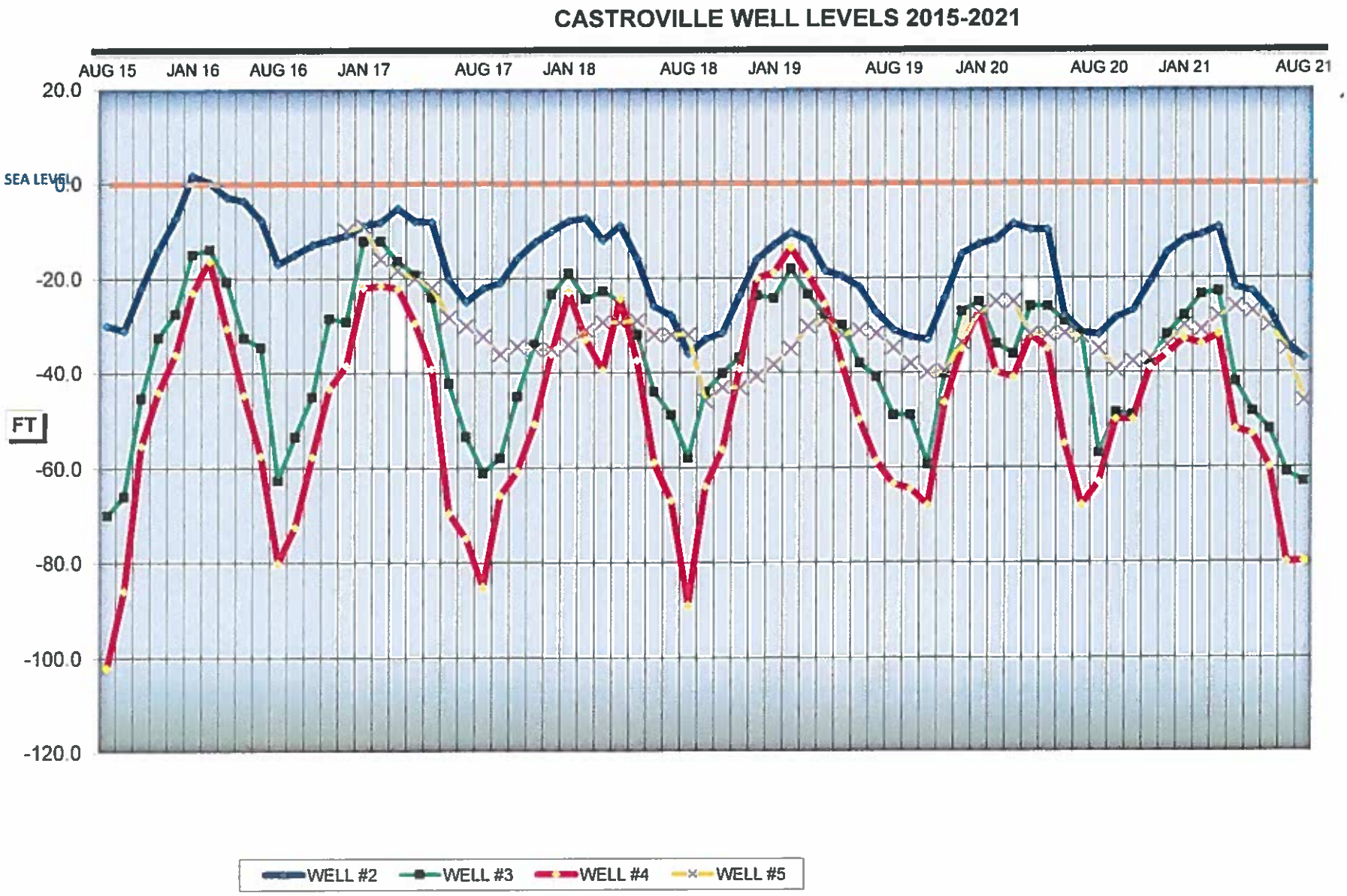
COUNTY OF MONTEREY
RESOURCE MANAGEMENT AGENCY
DEPARTMENT OF PUBLIC WORKS
ENGINEERING SECTION
[illegible]

CASTROVILLE STREETS PAVEMENT REHABILITATION
BETWEEN HWY 156 & BLACKIE RD AND CASTRO/GEIL TO MERRITT
PROJECT NO. XXXXXX

LAYOUT PLAN

DATE: 06/23/2021
SCALE: NOT TO SCALE
RELATIVE BORDER SCALE: IN INCHES 0 1 2 3
SHEET: G1
WBS: LAYOUT1


CASTROVILLE WELL LEVELS 2015-2021
AUG 15
JAN 16
AUG 16
JAN 17
AUG 17
JAN 18
AUG 18
JAN 19
AUG 19
JAN 20
AUG 20
JAN 21
20.0
0.0
-20.0
-40.0
-60.0
-80.0
-100.0
-120.0
SEA LEVEL
FT
WELL #2
WELL #3
WELL #4
WELL #5


CASTROVILLE WELL LEVELS 2015-2021
AUG 15
JAN 16
AUG 16
JAN 17
AUG 17
JAN 18
AUG 18
JAN 19
AUG 19
JAN 20
AUG 20
JAN 21
AUG 21
20.0
SEA LEVEL
0.0
-20.0
-40.0
FT
-60.0
-80.0
-100.0
-120.0
WELL #2
WELL #3
WELL #4
WELL #5

CASTROVILLE COMMUNITY SERVICES DISTRICT

GENERAL MANAGER'S REPORT JULY 20, 2021

- **Regulatory Compliance**
  - SWRCB-DDW inspection of water system April 2021
  - No coliform violations, all routine samples negative for June 2021
  - Well #3 on standby pending destruction by MCWRA
  - EAR report to SWRCB - May 15th
  - Completed MCWRA 2021 Well Extraction Report
  - Submitted Annual SWRCB-DDW water system report
  - Submitted water reports to 9 large Water system customers 6/9/2021
  - Regulatory documentation for Castroville Zone 1 sewer jetting activities
  - Submitted No-spill report to State documenting Castroville, Moro Cojo and Moss Landing systems for March 2021 on 6/2/2021
  - Regulatory documentation for MLCSD – Zone 1 & 2 sewer jetting activities
  - Regulatory documentation for CCSD – Zone 3 sewer jetting activities

- **Current Projects**
  - Maintain clean-up of Trash & graffiti @ HWY 156/ UPRR crossing at Benson Rd-
  - Implement grant for $395,00 Prop 1 funding for new water supply well
  - Consider MOU with County for Elkhorn bridge force main
  - Response to possible on-going litigation
  - Inspect Grease traps in Castroville & Moss Landing to reduce FOG
  - Design and secure funding for Washington sewer by-pass line
  - Finalize land purchase of site for future Deep Well #6
  - Review quotes for painting District Office
  - Review quotes for Recoat and re-seal the marshaling area at the office complex And recoating district paving and striping at District facilities
  - Replace awnings at District office
  - Complete EPA mandated Resilience, Recovery and ERP -due June 30th
  - Grant proposal to SWRCB for new Castroville water supply for $2.8 million
  - Consider "Ice Pigging" at District force mains
  - Moss Landing Operations, see report in Board packet
  - Moro Cojo Operations, see report in Board packet
  - Castroville Operations, see report in Board packet

❖ Completed Projects

- Smoke tested Struve Rd sewer system w/RCAC – found 7 cross connections and reported to M1W Source control
- Painted graffiti @ 17+ locations throughout town
- EPA mandated Risk and Resilience water system study submitted
- Pot-holing for new sewer force main @ Washington and Tembladera
- Investigate Soils and directional drilling for Washington bypass sewer line
- Repair leak on Hydro Tank #3- need to consider new tank @ site #4
- Inspect new Sewer, Storm drain and water connections for Hartnell campus
- MCWRA granted for $83,000 contribution for Well #3 destruction
- Plan review for sewer connections at Merritt and Washington Streets
- District awarded grant with DWR for Moss Landing sewer for $ 500,000
- Completed and submitted 2021 CCR to SWRCB-DDW
- Replaced 10 registers for water meters in May 2021
- Change-out Arsenic treatment media for Well #5 -approx. $134,000
- Repaired/replaced 3 service laterals
- Well site #4 modifications for filling storage tanks from distribution system & additional 600,000-gallon water tank

❖ Upcoming Projects

- Tie-in to MPWSP Desal water line
- Paint office Building & install new awnings
- Design and secure funding for New Deep Well#6
- Replace aging Hydro pneumatic tanks at well sites
- Recoat and re-seal the marshaling area at the office complex
- Install lock-down manhole covers on Castroville Blvd (1 of 3)
- Install new checks and gate valves for Castroville Blvd Lift Station
- Pig Station Lift Stations #1 & #2 force mains in Moss Landing
- New Deep Well #6 permitting, funding, land acquisition and design
- Investigate water and sewer capacity for Driscoll's 63 proposed Farm Labor Housing Units on Merritt Street at end of Union St.
- Consider costs for Castroville Oaks project for street & sewer service
- Design & funding for Washington Sewer Bypass line
- Finish installing "No dump- spills to Bay" medallions at all storm drain inlets

❖ **Meetings/Seminars (attended)**

- Meeting of the Executive Board of the SVGWB GSA -Ron & Eric
- DAC ongoing engagement with SVGWB-GSA
- Sea Water Intrusion Working Group Advisory Committee
- Monterey Peninsula Water Management District Board meeting
- Monterey 1 Water- various Board meetings- Ron and Eric
- MPWMD Board meeting- Ron and Eric
- SVGWBGSA-Advisory Committee-Eric
- Sea Water Intrusion Working Group (SWIG-TAC) Tech Advisory Committee
- Meeting of the Deep Well Working Group (MCWRA-TAC)
- SVGWB- Basin Overview workshop-Ron & Eric
- IRWM Committee meeting
- M1W Budget Committee-Ron & Eric
- Sea Water Intrusion Committee meeting- SWIG-Eric

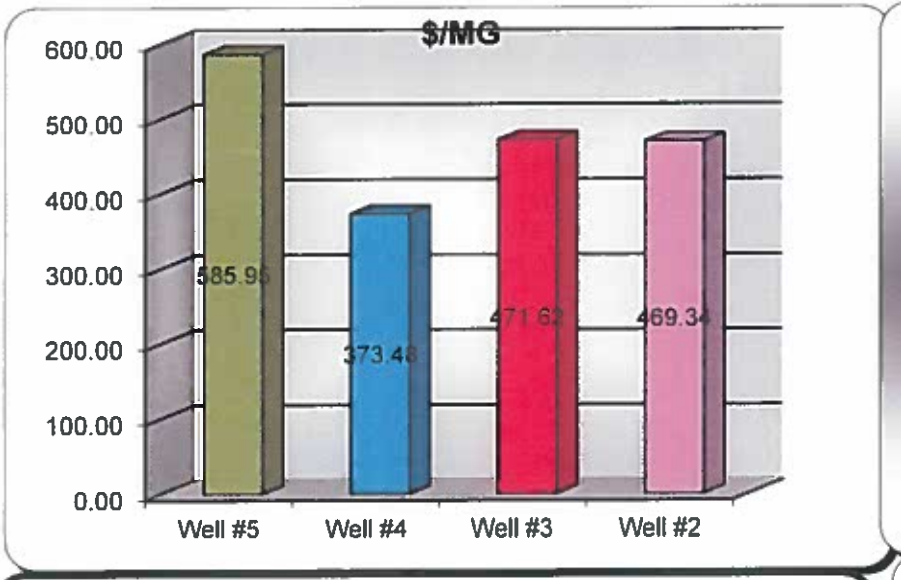
❖ **Meetings/Seminars (upcoming)**

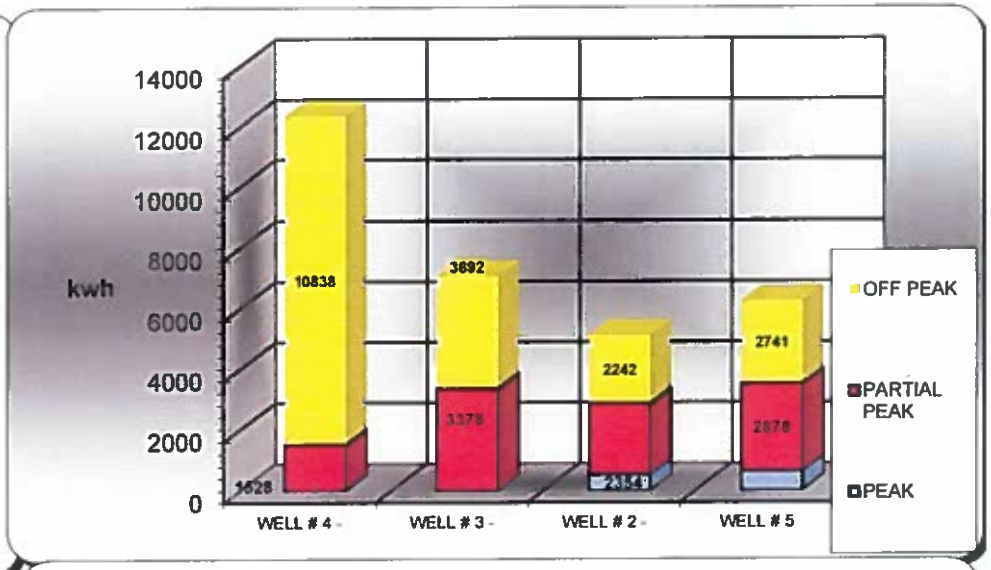
- Attend as Panelist for townhall re: LAFCO formation for East Garrison
- RCAC training Financial Management and Accounting
- Meeting of the MCWRA- TAC -Advisory Comm. on Deep Wells-Eric
- Moss Landing Chamber meeting
- Moss Landing Community Plan Update
- Monterey 1 Water- various Board meetings- Ron and Eric
- Neighborhood Watch
- Water & Wastewater General Managers group
- Quarterly Water Managers meeting
- SVGWB GSA Advisory committee meetings
- Monterey County Sherriff's Citizens Advisory Group-Adriana & Eric
- Quarterly Special District Managers meeting

❖ **Improvements/Ideas/Suggestions**

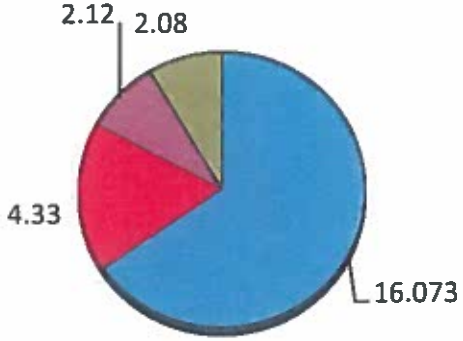
- Install "For fire use only- all others will be fined" on all fire hydrants
- Select areas for Saddle, main valves and lateral replacement program
- Pressure wash and weed maintenance on fire hydrants

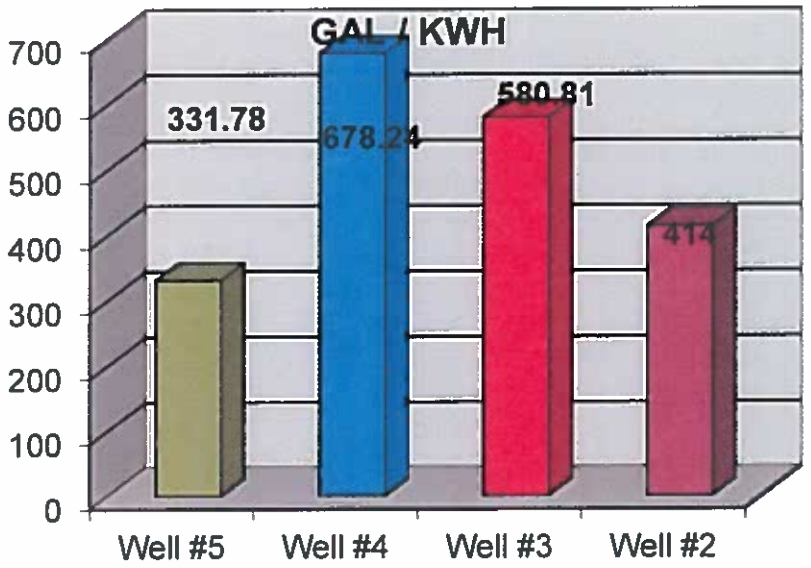
May-21





Million Gallons





MAY -21 to JUN- 21	PG&E	PEAK	PARTIAL PEAK	OFF PEAK	TOTAL KWH	FLOW/G x MG	PG&E $
WELL # 4 -	6/14/2021					691186000	
	5/14/2021					675113000	
65.33%			1528	10838	23698	16.073	$6,003
WELL # 3 -	6/14/2021					204980000	$2,044
	5/14/2021					200646000	
17.62%			3378	3692	7462	4.33	
WELL # 2 -	6/14/2021					517098000	$995
	5/14/2021					514978000	
8.62%		521	2354	2242	5118	2.12	
WELL # 5	6/14/2021					83443013	$1,216
	5/14/2021					81367747	
8.44%		637	2878	2741	6255	2.08	
MONTHLY TOTALS		1158	10138	19513	42533	24.60	$10,258

Well 2- 45 %
Well 5-55 %

$417
AVG. $ PER MILLION GALLONS

$138
AVG $ PRICE PER ACFT

Power usage by rates zones

$ / MG	Well #5	Well #4	Well #3	Well #2
	585.95	373.48	471.62	469.34

WELL SITE 2 DATA

	well 2
PG&E $	$2.602
TOTAL KWH	12558
$/KWH	$0.21
PARTIAL PEAK	2262
OFF PEAK	9745

Gal / Kwh

Well #5	Well #4	Well #3	Well #2
332	678	581	414

CASTROVILLE COMMUNITY SERVICES DISTRICT

OPERATIONS REPORT
June 2021

Emergency calls:

Leak at 11878 Cypress St.

Leak at 10961 Haight St.

Leak at 10840 Seymor St.

Sea Garden – Bad Level Sensor (JR on call).

Maintenance:

- Shop Inventory.
- Moss Landing – Sewer Inspections.
- Lift Station # 3 – Check valve stuck in open position.
- Well # 2 – Paint Storage Tank Top Vent.
- Sea Garden LS – Paint Propane Gas Tank.
- Conference Room – Fix Lights.
- Video Del Monte and Main St. Sewer Lines.
- Well # 3 – Install Water Hose and Meter to Maintain Chlorine Residual.
- Well # 2 – R.O. Installation
- Moss Landing – Video Sewer MH26 – MH25.
- Castroville Blvd. – Install Lights timer.
- Jetter truck – Hose was repaired.
- Well # 4 – Grease Booster # 1.
- Hartnell College - Job Cost.
- Sea Garden / Castroville Blvd. – Fill up Propane tanks / Replace Pressure Reg. Valves.

Weekly

- Rounds – Well sites (Check water softeners, Chlorine Generator, tanks, pumps, etc.)
- Mark water and sewer lines (USA's) as necessary.
- Respond to e-mails.
- Rounds - Lift stations (Check fluids, oil, alarms, floats, etc.)
- Jetting. (Castroville, Moro Cojo, Moss Landing).
- Water samples (Bacteria).
- Mapping reports.
- Office grounds keeping.
- Wash and clean trucks.
- Lift stations grounds keeping.
- Maintain Cartegraph records updated.
- Take Garbage and recycle out.

Monthly

- Run Generators.
- Water Loss Report.
- Read and re-read meters.
- Deliver 72 hrs. notices.
- Replace registers.
- Reset logs on tablet for Lift Stations.
- Reset logs on hand-held for Well sites.
- Fire Hydrants readings.
- Read water level well bubblers.
- Troubleshoot computers, printer, Internet.
- Water Well level bubblers readings.

Work Orders:

a) 7 Day Disconnect Notice – 34
b) Final Bill Read Meter – 8
c) Investigate – 4
d) Miscellaneous – 4
e) Intall/Change Meter -1
f) Turn on Service - 2
g) Reg – 1
h) Shut Off - 1

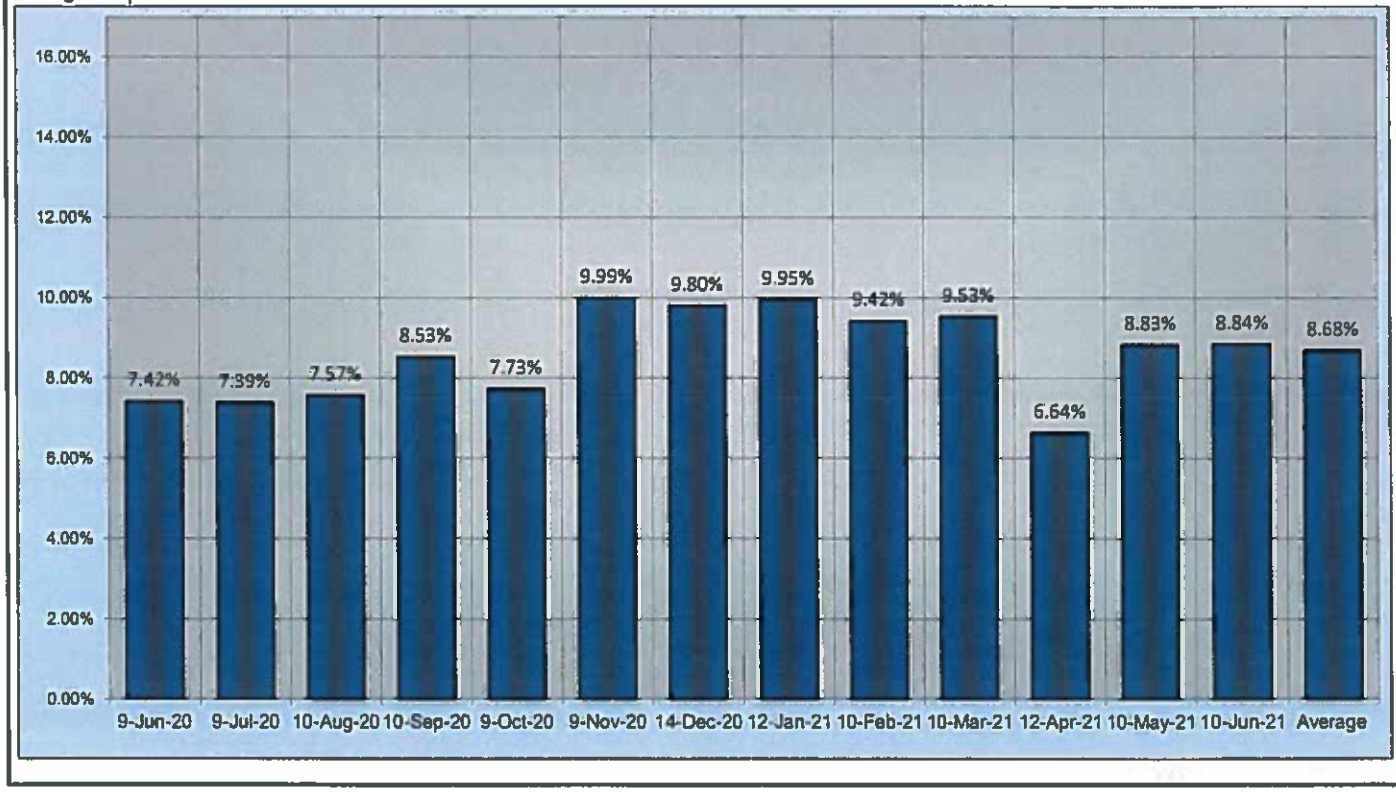
TOTAL WORK ORDERS – 42

Castroville Community Services District

Percent Water Loss

Monthly & Yearly

Month	Well #5 Gal.	Site 2 Well Gal.	Site 3 Well Gal.	Site 4 Well Gal.	Totals Water Pumped	Totals Water Sold	miscellaneous	Unaccounted Water %
9-Jun-20	2787634	2890000	5062000	11867000	22606634	20524492	404976	7.42%
9-Jul-20	2898739	3007000	5454000	13259000	24618739	22416632	383916	7.39%
10-Aug-20	2506892	2869000	5120000	15792000	26287892	23790237	508259	7.57%
10-Sep-20	2524901	2673000	5169000	15431000	25797901	23190850	406480	8.53%
9-Oct-20	2190333	2566000	5114000	13231000	23101333	20975678	339976	7.73%
9-Nov-20	2355041	2515000	4792000	13844000	23506041	21020722	136543	9.99%
14-Dec-20	2153919	2301000	4954000	11929000	21337919	19105708	141208	9.80%
12-Jan-21	1501603	1552000	3820000	8382000	15255603	13606262	131751	9.95%
10-Feb-21	2559535	2687000	3503000	6395000	15144535	13652586	65806	9.42%
10-Mar-21	1030589	987000	3747000	9333000	15097589	13508491	150666	9.53%
12-Apr-21	1051320	4304000	4360000	9762000	19477320	17545357	639103	6.64%
10-May-21	1395892	1798000	4639000	12341000	20173892	18144393	247795	8.83%
10-Jun-21	1890618	1933000	5074000	14943000	23840618	21316639	415776	8.84%
Average								8.68%



CASTROVILLE COMMUNITY SERVICES DISTRICT

CASTROVILLE - ZONE 1
MONTHLY O&M REPORT
JUNE 2021

❖ **LIFT STATION #5 Del Monte**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ **LIFT STATION #6 @ Sea Garden**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ LIFT STATION #7 @ Via Linda

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ JETTING ACTIVITIES

- Total jetted approx. 6,310 feet

❖ OTHER MATTERS

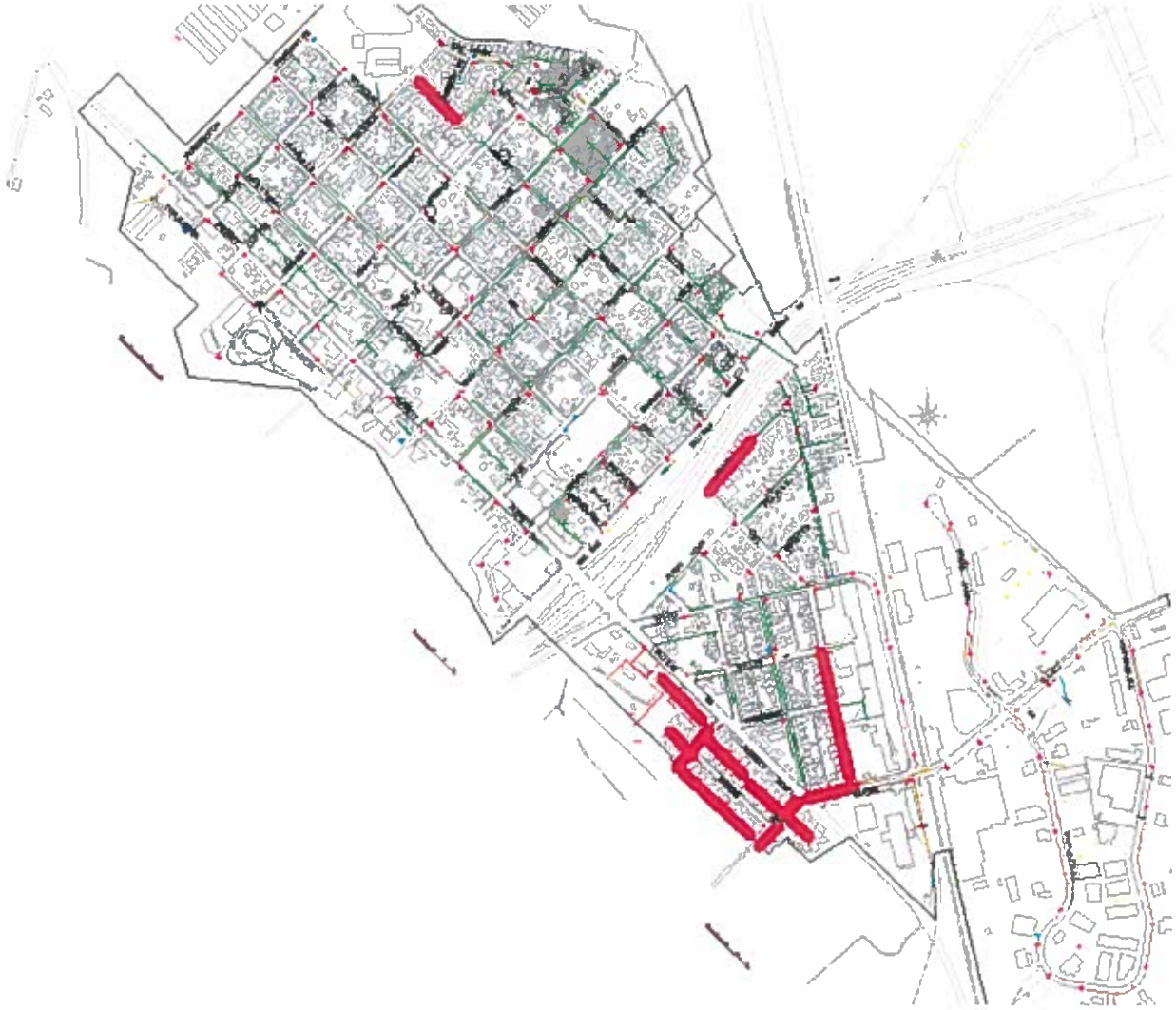
- Responded to 12 Underground Alert marking requests
- Submitted no-spill report to SWRCB on 7-6-2021
- Clean storm drains in January and February 2021
- Performed Bi-annual inspection of grease traps at various facilities in and March 2021 and November 2020

❖ Improvements/CIP/Suggestions

- Confirm that storm drain interceptors are Marked- "DO NOT DUMP, FLOWS TO BAY" by August 2021
- Confirm that storm drain interceptors are clear

Castroville

JUNE 2021 JETTING 7/13/2021



ID	Material	Length	Street	Downstream MH	Upstream MH
10800 Oak	6" Clay	310	OAK St.	MH 30	CO 30.2
10800Palm	6" Clay	145	Palm St.	MH 32	MH 33
10900Oak	6" Clay	123	OAK St.	MH 29	MH 30
10900Palm	6" Clay	135	Palm St.	MH 32	MH 33
11000Blackie	6" Clay	436	Blackie Rd	MH 28	MH 29
11200Blackie	8" Clay	440	Blackie Rd	MH 28	MH 28.1
11300Main	6" Clay	400	Main St.	MH 21	MH 21.1
11400Blevins	SDR35 6"	236	Blevins Way	MH 11.6	MH 11.8
11600Castro	10" Clay	423	Castro St.	MH 26	MH 27
11600Cypress	6" Clay	165	Cypress St.	MH?	CO 35
11600Merritt	6" Clay	220	Palm St.	MH 32	CO31.1
11700Castro	10" Clay	602	Castro St.	MH 27	MH 28
11700Cypress/alley	6" Clay	700	Cypress St.	MH 33	CO 34
11700MerrittWay	6" Clay	390	Cypress St.	MH 31	MH 32
11750MerrittWay	6" Clay	390	Cypress St.	MH 30	MH 31
11800CypressCir	6" Clay	234	Cypress Cir	MH 30	CO 30.1
11800DelMonte	8" Clay	395	Del Monte Ave.	MH 28.1	MH 28.6
11900DelMonte	8" Clay	177	Del Monte Ave.	MH 28.6	MH 28.2
11950DelMonte	8" Clay	109	Del Monte Ave.	MH 28.2	CO 28.3
13000Blackie	8" Clay	250	Blackie Rd	MH 28.1	CO 28.11
Oak/Cypress	6" Clay	30	OAK St.	MH 30	MH 30
	TOTAL	**6310**			

CASTROVILLE COMMUNITY SERVICES DISTRICT

MORO COJO - ZONE 2
MONTHLY O&M REPORT
JUNE 2021

❖ **LIFT STATION @ CASTROVILLE BLVD**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ **LIFT STATION @ COMPO DE CASA**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

- **JETTING ACTIVITIES**
  - Jetted sewer lines btwn MH #72 to-MH #72.1
  - Jetted sewer lines btwn MH #73 to-MH #73.1
  - Jetted sewer lines btwn MH #72 to-MH #73
  - Jetted sewer lines btwn MH #71 to-MH #72

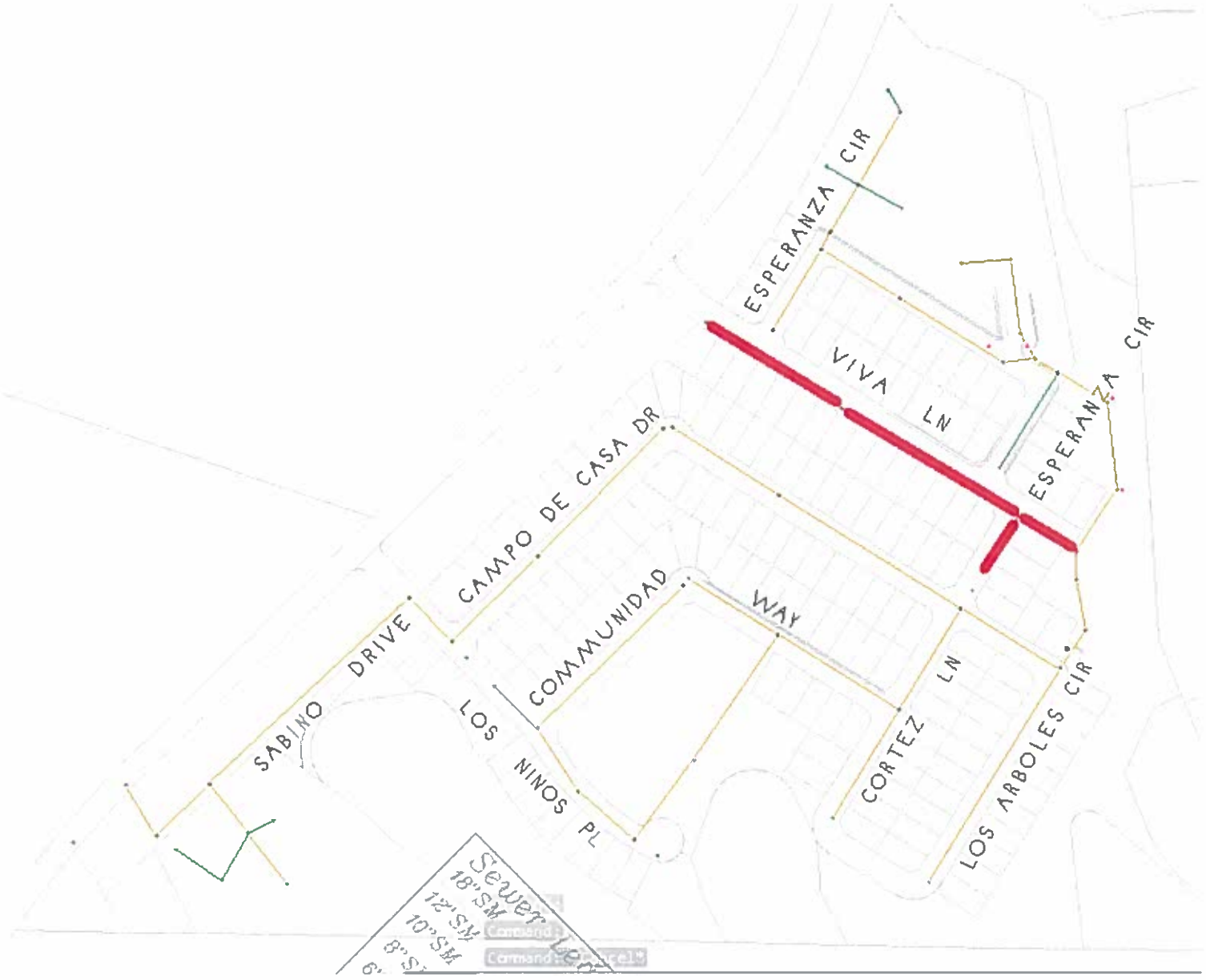
  - Total jetted approx. 1055 feet

- **OTHER MATTERS**
  - Responded to 0 Underground Alert marking requests
  - Cleaned and weed-whacked Lift Station site
  - Reported 1 Street light out
  - SWRCB-Reported "no-spill" 7/6/2021
  - NCP&R Cleaned EQ Basins in Dec 2020
  - Performed inspection of all storm drains in November 2020
  - Street sweeper cleaned in November
  - Mowing completed April-May 2021
  - Detention ponds are clean & fence secured

- **Improvements/CIP/Suggestions**
  - Confirm that storm drain interceptors are clear

Moro Cojo

JUNE 2021 JETTING 7/13/2021



ID	Material	Length	Street	Downstream MH	Upstream MH
Cortez Ln	PSM SDR35 6"	135	Cortez Ln.	MH 72	CO 72.1
Viva Ln	8" PVC	340	Viva Ln	MH 73	CO 73.1
Viva Ln/2	8" PVC	440	Viva Ln	MH 72	MH 73
Viva Ln/3	8" PVC	140	Viva Ln	MH 71	MH 72
	TOTAL	**1055**			

CASTROVILLE COMMUNITY SERVICES DISTRICT

MOSS LANDING (ZONE 3)
MONTHLY O&M REPORT

JUNE 2021

❖ LIFT STATION # 1 (Struve Rd)

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ LIFT STATION #2 (Hwy 1 @ Pottery barn)

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ **LIFT STATION #3 (in front of Phil's fish market)**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ **LIFT STATION #4 (Potrero Rd)**

- Did pump-down, alarm check, and general inspection of Lift Station 6/3/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/10/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/17/2021
- Did pump-down, alarm check, and general inspection of Lift Station 6/24/2021

❖ **JETTING ACTIVITIES**

- Jetted sewer lines btwn MH #5 to-MH #1
- Jetted sewer lines btwn MH #1 to-MH #2
- Jetted sewer lines btwn MH #6 to-MH #5
- Jetted sewer lines btwn MH #7 to-MH #6
- Jetted sewer lines btwn MH #1 to-MH #9

- Total jetted approx. 1505 feet

❖ **OTHER MATTERS**

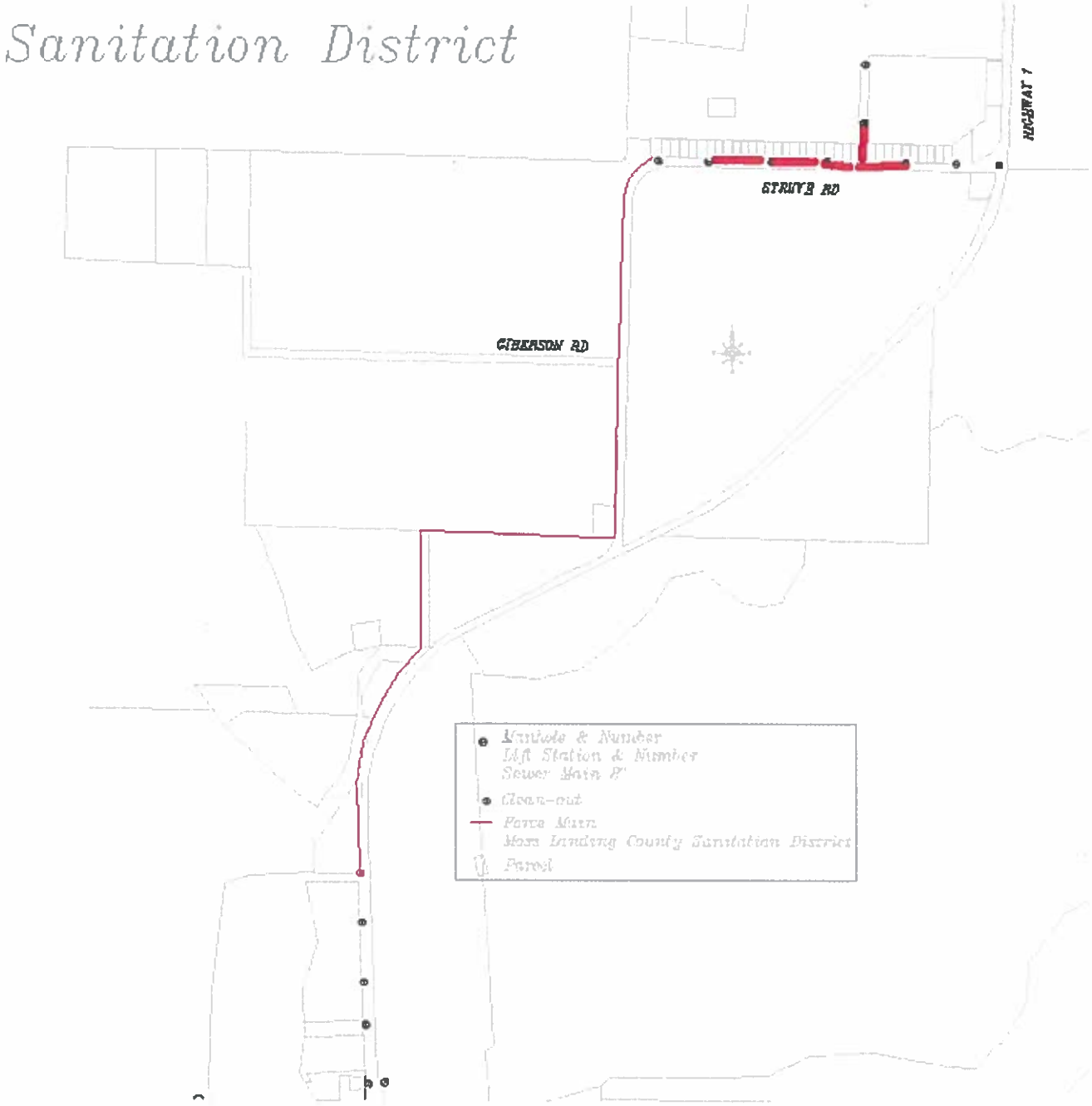
- Responded to 17 Underground Alert marking requests
- Received approval for $500,000 grant from DWR to initiate Moss Landing sewer system improvements and upgrades
- Finalizing grant application for $2.8 Million for upgrades and repair of sewer system
- Performed Bi-annual inspection of grease traps at various facilities in and March and May 2021
- Emailed notice of "no spill" to CIWQS 7-6-2021
- Need to replace manholes on HWY 1, Sandholdt and Jetty Road
- Manhole at Jetty Rd leaking need to replace before rains again
- Investigating grant opportunity from M1W of $800,000

❖ **Improvements/CIP/Suggestions**

- Need to recoat or replace 7 manholes that internal walls are failing
- Consider options for Elkhorn Bridge Force Main replacement
- Schedule pigging of Station #1 & Station #2 force mains

Moss Landing

JUNE 2021 JETTING 7/14/2021



ID	Material	Length	Street	Downstream MH	Upstream MH
MH1>MH5	8" Clay	252	Struve Rd.	MH5 ML	MH1 ML
MH2>MH1	8" Clay	285	Struve Rd.	MH1 ML	MH2 ML
MH5>MH6	8" Clay	398	Struve Rd.	MH6 ML	MH5 ML
MH6>MH7	8" Clay	305	Struve Rd.	MH7 ML	MH6 ML
MH9>MH1	8" Clay	265	Struve Rd.	MH1 ML	MH9 ML
	TOTAL	1505			

CASTROVILLE COMMUNITY SERVICES DISTRICT

GENERAL MANAGER'S REPORT AUGUST 21, 2021

- **Regulatory Compliance**
  - Last SWRCB-DDW inspection of water system April 2021
  - No coliform violations, all routine samples negative for June, July and August
  - Well #3 Abandoned pending destruction by MCWRA
  - EAR report submitted to SWRCB - May 15th
  - Completed MCWRA 2021 Well Extraction Report
  - Submitted Annual SWRCB-DDW water system report
  - Submitted water reports to 9 large Water system customers 6/9 and 7/7/2021
  - Submitted No-spill report to State documenting Zone 1, 2 & 3 for June and July
  - Regulatory documentation for MLCSD – Zone 1 & 2 sewer jetting activities
  - Regulatory documentation for CCSD – Zone 3 sewer jetting activities

- **Current Projects**
  - Implement grant for $395,00 Prop 1 funding for new water supply well
  - Follow up with M1W re: Smoke tested Struve Rd sewer system w/RCAC – found 7 cross connections and reported to M1W Source control
  - Finalize MOU with County for Elkhorn bridge force main
  - Investigating Sea Harvest Lift Station malfunctions & lack of flow
  - Response to possible on-going litigation
  - Inspect Grease traps in Castroville & Moss Landing to reduce FOG
  - Design and secure funding for Washington sewer by-pass line
  - Finalize land purchase of site for future Deep Well #6
  - Review quotes for painting District Office
  - Review quotes for Recoat and re-seal the marshaling area at the office complex And recoating district paving and striping at District facilities
  - Replace awnings at District office
  - Complete EPA mandated Resilience, Recovery and ERP -due June 30th
  - Grant proposal to SWRCB for new Castroville water supply for $2.8 million
  - Consider" Ice Pigging" at District force mains
  - Zone 1-Castroville Serwer Operations, see report in Board packet
  - Zone 2-Moro Cojo Sewer Operations, see report in Board packet
  - Zone 3- Moss Landing Sewer Operations, see report in Board packet

❖ Completed Projects

- Painted graffiti @ 10 locations throughout town
- Recoat and re-stripe the parking area at the office complex
- EPA mandated Risk and Resilience water system study submitted
- Pot-holing for new sewer force main @ Washington and Tembladera
- Investigate Soils and directional drilling for Washington bypass sewer line
- Repair leak on Hydro Tank #3- need to consider new tank @ site #4
- Inspect new Sewer, Storm drain and water connections for Hartnell campus
- MCWRA granted for $83,000 contribution for Well #3 destruction
- Plan review for sewer connections at Merritt and Washington Streets
- District awarded grant with DWR for Moss Landing sewer for $ 500,000
- Completed and submitted 2021 CCR to SWRCB-DDW
- Replaced 10 registers for water meters in May 2021
- Changed-out Arsenic treatment media for Well #5 -
- Repaired/replaced 3 service laterals
- Planning well site #4 modifications for filling storage tanks from distribution system & additional 600,000-gallon water tank

❖ Upcoming Projects

- Tie-in to MPWSP Desal water line
- Paint office Building & install new awnings
- Design and secure funding for New Deep Well#6
- Replace aging Hydro pneumatic tanks at well sites
- Install lock-down manhole covers on Castroville Blvd (1 of 3)
- Install new checks and gate valves for Castroville Blvd Lift Station
- Pig Station Lift Stations #1 & #2 force mains in Moss Landing
- New Deep Well #6 permitting, funding, land acquisition and design
- Investigate water and sewer capacity for Driscoll's 63 proposed Farm Labor Housing Units on Merritt Street at end of Union St.
- Consider costs for Castroville Oaks project for street & sewer service
- Design & funding for Washington Sewer Bypass line
- Investigate possible Well 7 location
- Locate old connections for replacement before County proceeds with street rehab of south side of town
- Finish installing "No dump- spills to Bay" medallions at all storm drain inlets

❖ Meetings/Seminars (attended)

- Meeting of the Executive Board of the SVGWB GSA -Ron & Eric
- DAC ongoing engagement with SVGWB-GSA
- Sea Water Intrusion Working Group Advisory Committee
- Monterey Peninsula Water Management District Board meeting
- Monterey 1 Water- various Board meetings- Ron and Eric
- MPWMD Board meeting- Ron and Eric
- SVGWBGSA-SWIG -Advisory Committee-Eric
- Sea Water Intrusion Working Group (SWIG-TAC) Tech Advisory Committee
- Meeting of the Deep Well Working Group (MCWRA-TAC)
- SVGWB- Basin Overview workshop-Ron & Eric
- IRWM Committee meeting
- Attend as Panelist for townhall re: LAFCO formation for East Garrison
- RCAC training Financial Management and Accounting
- SVGWB- GSA Directors meeting-Ron & Eric
- M1W Budget Committee-Ron & Eric

❖ Meetings/Seminars (upcoming)

- Meeting of the MCWRA- TAC -Advisory Comm. on Deep Wells-Eric
- Moss Landing Chamber meeting
- Clean & Dirty Water Managers meeting
- Moss Landing Community Plan Update
- Monterey 1 Water- various Board meetings- Ron and Eric
- Sea Water Intrusion Group Advisory meeting- SWIG-Eric
- Water & Wastewater General Managers group
- Quarterly Water Managers meeting
- SVGWB GSA Advisory committee meetings
- Monterey County Sherriff's Citizens Advisory Group-Adriana & Eric
- Quarterly Special District Managers meeting

❖ Improvements/Ideas/Suggestions

- Install "For fire use only- all others will be fined" on all fire hydrants
- Select areas for Saddle, main valves and lateral replacement program
- Pressure wash and weed maintenance on fire hydrants