



MONTEREY PENINSULA WATER MANAGEMENT DISTRICT

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March 22, 2004

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SUBJECT: MPWMD COMMENTS ON DRAFT EIR FOR PEBBLE BEACH COMPANY DEVELOPMENT PLAN – SCH #2002021130

Dear Mr. McCue:

The Monterey Peninsula Water Management District (MPWMD) appreciates this opportunity to comment on the above-referenced Draft EIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. The proposed project includes a new 18-hole golf course, a new driving range, and 160 new visitor-serving units (173 rooms); relocation of the existing Equestrian Center; creation of 33 residential lots within 5 subdivisions; and construction of 60 employee housing units.

The MPWMD is responsible for water resources management for the Monterey Peninsula, including the Carmel River Basin, Seaside Groundwater Basin and the Del Monte Forest area. Our comments are divided into two parts: (1) reclamation and associated water entitlements, and (2) accuracy of water demand estimates.

Reclamation and Water Entitlements

Comment 1: Mitigation Measure PSU-E1 (pages 3.5-15 and 3.5-16). Three alternative mitigation approaches are proposed to address the impact of increased demand for potable water for irrigation. The first two involve improvements to existing distribution systems to deliver potable water to the Proposed Golf Course and to other irrigation sites. Neither of these two approaches should be allowed because they would exacerbate existing adverse effects to the Carmel River due to water diversions to serve the community. Potable water should not be used for irrigation of any proposed new facilities, and all efforts should be made to minimize potable use for irrigation associated with the Proposed Project and for existing users of the CAWD/PBCSD Recycled Water Project. Only the third alternative mitigation approach should be allowed, that is, implementation of the Phase II improvements to the CAWD/PBCSD Recycled Water Project prior to any increased irrigation associated with the Proposed Project.

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Comment 2: At least four tables in the DEIR (Table 4.4-7 [page 4.4-36], Table 4.4-8 [page 4.4-37], and Tables G.2-1B and G.2-6B in Appendix G.2) indicate that with the Phase II improvements to the CAWD/PBCSD Recycled Water Project, 100 percent of the cumulative irrigation use (existing plus project irrigation use) can be met up to a total of 1,352.4 acre-feet per year with the "drier than normal during dry season year" scenario. Adequate information does not appear in the EIR to support this conclusion. Some information is provided in Appendix G.2 regarding recycled water plant capacity and Forest Lake Reservoir capacity. A water balance calculation or spreadsheet should be included in the EIR to demonstrate how the conclusions regarding recycled water availability were reached.

Based on technical documents the Water Management District has reviewed to date, the District is concerned that the proposed Phase II reclamation project may not be able to meet the maximum irrigation requirements described in the Draft EIR. We recommend that the EIR preparers confer with CAWD and PBCSD to clarify this issue. If it is determined that 1,352.4 AF is not available for use in dry years, then all sections in the EIR that refer to, and are based on 1,352.4 AF supply from the reclamation project should be revised.

Comment 3: Appendix G.2, Table G.2-7, titled "Summary of Pebble Beach Company's Water Entitlement by Area." What does the last line of this table represent? The "Area" is stated to be "Proposed Project Area," and the water entitlement amount is indicated to be 349.15 AFY. The EIR should explain what the 349.15 AF figure signifies and how it was derived. Also, Pebble Beach Company's water entitlement does not include Area S and Area W. The information in the table should be clarified as to the ownership of these two areas and the fact that they are not part of the Pebble Beach Company's entitlement.

Water Demand Estimates

Comment 4: Table G.2-3A, Potable Water Use of Proposed Project. For initial planning purposes, MPWMD staff concurs with the estimated water demand projections described in the Draft EIR, but suggests some refinements for the Final EIR as described below.

MPWMD has established water use factors for various uses, which are contained in the MPWMD Rules and Regulations (Rule 24). Commercial water factors are used to estimate demand for non-residential uses and residential projects use a fixture unit methodology to estimate potential demand. It is the MPWMD's policy to conduct a site inspection before any change in use or permanent abandonment of use (i.e. demolition of structures).

MPWMD does not have a water use factor specific to golf courses. Water use at the proposed golf course should be calculated by reviewing actual use at the other 18-hole courses in the Del Monte Forest area. The Final EIR should reevaluate the proposed golf course consumption by including a professional turf irrigation assessment and water use

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budget, based on local weather and soil conditions, planned irrigation systems, and the type of turf grass and related plantings.

Table G.2-3A shows a project water demand of 33.0 AF for 33 residential units. It is MPWMD's understanding that this figure is based on an estimated average of 1.0 AFY per residence. The water demand projections appear reasonable as an initial estimate. However, recent MPWMD action requires properties greater than 10,000 square-feet to prepare water budgets for all landscaped areas, and the water demand from the water budget is additive to the District's outdoor water use factor (i.e. one-half of the total interior fixture unit value). The Final EIR should clearly describe this process and the consultant may want to include an additional increment of water for outdoor uses for those projects that will be subject to water budgets.

The MPWMD will finally calculate the estimated water demand at the time that the individual project is pending a building permit. It should be noted that the MPWMD plans to update its commercial water use factors in the near future. Projects are subject to the rules in effect at the time the complete application package is received. Rules may be periodically revised by action of the MPWMD Board of Directors. Therefore, the use factors used in this DEIR may not be identical to the factors in effect at the time the water permit is issued. Finally, the District will review the project again upon completion (or occupancy) to determine that the proper water use factors were applied and that an appropriate amount of water was set aside for the project.

Thank you for this opportunity to review the Draft EIR for the Pebble Beach Company's Del Monte Forest Preservation and Development Plan. If you have any questions regarding reclamation/water entitlement, please contact Andy Bell, Planning & Engineering Division Manager, at 658-5620. For questions on water demand estimates, please contact Stephanie Pintar, Water Demand Division Manager, at 658-5630.

Sincerely,

for 

Fran Farina
 General Manager

Cc: MPWMD Board
 Andy Bell
 Stephanie Pintar