



June 10, 2011

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DIRWM, Financial Assistance Branch  
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Sacramento, CA 94236-0001

Attention: Trevor Joseph

Sent via email to: DWR\_IRWM@water.ca.gov

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**RE: A response to the proposal evaluation of: Implementing IRWM Projects in the Greater Monterey County Region**

Dear Trevor Joseph,

This letter provides a response to the Proposal Evaluation of the proposal titled "Implementing IRWM Projects in the Greater Monterey County Region" submitted by the City of Soledad under the Proposition 84 Integrated Regional Water Management (IRWM) Grant Program, Implementation Grant, Round 1, FY 2010-2011.

We thank the review committee for their consideration of our proposal, and the organized and transparent manner with which the process has been conducted. We support your draft funding recommendation. Having been recommended for partial funding, we hope that some level of additional funding could be applied to this project.

This letter provides specific response to a selection of the comments provided in the evaluation, largely by identifying information contained in the many pages of the proposal that may have been overlooked. As a result, you may find it appropriate to assign additional points to our proposal, which may justify an increase in funding level towards the amount requested.

Feel free to contact us if you have any questions.

Sincerely,

Bryan Largay

Elkhorn Slough Tidal Wetland Project Director

On behalf of the Greater Monterey County Regional Water Management Group

## **A response to the proposal evaluation of:**

### **Implementing IRWM Projects in the Greater Monterey County Region**

**Applicant: City of Soledad**

**Proposition 84 Integrated Regional Water Management (IRWM) Grant Program, Implementation Grant, Round 1, FY 2010-2011.**

## **Work Plan**

The reviewers noted that “it is not clear which agency or entity will administer the grant by compiling the sub-grantee invoices and reports.”

In the application package, the City of Soledad provided an executed copy of the authorizing resolution as the lead agency on this project. The resolution number 4599 was included in the application package as part of attachment one (provided in the proposal under filename ATT1\_IG1\_Eligible\_2of5). An excerpt is provided below:

**NOW THEREFORE, BE IT HEREBY RESOLVED**, by the City Council of the City of Soledad as follows:

- 1) Authorizes that application be made to the California department of Water Resources to obtain an Integrated Regional Water Management Implementation Grant pursuant to the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006 (Public Resource Code Section 75001 et seq.);
- 2) Appointing the City Manager or her delegate as the authorized representative for the City of Soledad to enter into an agreement to receive a grant for the City of Soledad Recycle Water Project;
- 3) Authorizing and directing the City Manager or her delegate to prepare the necessary data, conduct investigations, file such application, and execute a grant agreement with California Department of Water Resources.

**PASSED AND ADOPTED** by the City Council of the City of Soledad at a special meeting duly held on the 15<sup>th</sup> of December, 2010....”

The reviewers noted that the “Project 7 work plan does not indicate any deliverable to DWR, and lacks any supporting documentation, such as structural specifications or a picture of the proposed LIDs.”

An interpretive data report is the final deliverable listed in the Work Plan as Task 7.3.e on page 127, as a Deliverable on page 128, and on pages 170 and 171. This report will summarize the findings of the project and will be made available to DWR as well as other agencies and interested stakeholders, furthering the overall goals of the IRWMP.

The project evaluates the potential for existing LID projects to reduce toxicity of stormwater runoff during rain events. No new construction of LIDs will take place as

part of this project, and as such, there are no structural specifications or pictures of proposed LIDs provided. On page 127 of the Materials, Methods and Standards section it is stated that no new construction will occur. The project lead felt that providing the construction plans and design specifics of the existing LID sites might be confusing or misleading if the project reviewers thought the designs would be constructed as part of this proposal. All LID sites being evaluated for this project have been constructed by other entities and are already completed. Photographs of LIDs that are used in the project will be included in the final report.

### **Water Quality and Other Expected Benefits**

The review noted: "Only average levels of benefits relative to costs might be realized through this proposal; however, the quality of the analysis is partially lacking and supporting documentation is partially unsubstantiated."

The proposed projects provide numerous water quality and other expected benefits, including benefits with respect to the environment, climate change, and public outreach and recreation. A table on pages 4 and 5 of the Work Plan Introduction (proposal filename ATT3\_IG1\_Workplan\_1of46.pdf) provides an overview of these benefits.

Eight different categories of water quality benefits are identified, which will improve the condition of surface water (inland), groundwater, estuarine waters and coastal waters. The projects address 15 of 20 Water Quality goals and objectives and all 14 of 14 Environment goals/objectives, which are listed in the table on pages 12-16 of the Work Plan Introduction.

Each of the seven proposed projects provide water quality and other benefits, however the text of the proposal review focused only on the benefits provided by Project 4. We expect that if the benefits of the other projects were fully considered, the project would be considered to have above average water quality and other benefits.

The benefits of the specific projects are reviewed below. This information was provided in the proposal and supporting documentation, and is reiterated here to facilitate review. Two major water quality management priorities in our region are seawater intrusion and nitrate contamination of groundwater. Because these affect water supply, they are discussed in our proposal in sections pertaining to supply in addition to water quality, and some of those benefits may have been missed in the evaluation process.

#### ***Project 1***

The Soledad Water Recycling/Reclamation Project provides water quality benefits detailed in the Work Plan Introduction (included in the proposal under filename ATT3\_IG1\_WorkPlan\_1of46) and appendices. Salinas Valley groundwater is adversely impacted by nitrate. Nitrate removal is one of the focal points of the project, and has regional groundwater quality benefits. As described in the proposal, the Soledad Project directly implements upgrades to improve water quality, which are called out for in the Long Term Wastewater Management Plan (included in the proposal under filename ATT3\_IG1\_Workplan\_4of46.pdf). This plan identifies targets for nitrate that the project will help meet: *"the 2005 WDR includes an effluent limit for 5 mg/L nitrate (as N) to take effect in January 2006 and 5 mg/L ammonia (as N) to take effect in January 2010."*

The Monterey County Groundwater Management Plan (included in the proposal under filename ATT1\_IG1\_Eligible\_3of5) details water quality needs of the region. The Soledad recycle water project is integral to the plan's overall success in reducing nitrates and providing overall improvement in the Forebay Basin of the Salinas River aquifer. These benefits are highlighted in the plan in Chapter 4, Groundwater Management Plan elements; Element 6: Short-term and Long-term Water Quality Management, and Element 7: Continued integration of recycled water.

### ***Project 2***

The Castroville CSD Well 2B Treatment Project will enable water supply to be drawn from the 900 foot aquifer. This is a critical strategy to reduce over pumping of the 180 and 400 foot aquifers in order to reduce water quality impairment of those aquifers by seawater intrusion. This benefit is described in the Work Plan Introduction (filename ATT3\_IG1\_WorkPlan\_1of46). Castroville Well 2B would significantly help mitigate salt water intrusion by reducing pumping on the 400' aquifer which is intruded up to 3 miles inland, as identified in the 2009 Groundwater Summary Report (included in the proposal under filename ATT3\_IG1\_WorkPlan\_25of46) and the 2007 Seawater Intrusion Maps (included in the proposal under filename ATT3\_IG1\_WorkPlan\_26of46). Well 2B would therefore help the water quality for the community around Castroville as well as private parties who pump nearby.

### ***Project 3***

The San Jerardo Wastewater Project: Water Quality Concerns in a Disadvantaged Farm-Worker Community in the Salinas Valley addresses nitrate contamination in the Salinas Valley Groundwater Basin. Salinas Valley groundwater is adversely impacted by nitrate, as described in the Work Plan Introduction (included in the proposal under filename ATT3\_IG1\_WorkPlan\_1of46). Nitrate removal is one of the focal points of the project, and will be achieved through the proposed wastewater treatment improvements. The project will also improve water quality by reducing the discharge of 1,2,3-trichloropropane into the underlying aquifer system (see the Work Plan Introduction).

### ***Project 4***

The review comments illustrate that the Project 4 benefits were fully considered.

### ***Project 5***

The project Water Quality Enhancement of the Tembladero Slough and Coastal Access for the Community of Castroville is intended to "enhance the thoroughly degraded Tembladero Slough, a water body which currently has 14 303(d) listed pollutants that flows untreated into the Monterey Bay National Marine Sanctuary", described in the Work Plan Introduction. Achieving these benefits will require a collaborative effort "between County planners, farmers, scientific researchers, and the community," which is the focus of this phase of the project. This will set the stage for actions on the ground in the future to "improve water quality through the purchase of easements and creation of treatment wetlands in strategic locations along the slough". The coordination project will also "improve flood plain open space areas, create enhanced habitat, and construct

public access trails..." This focused planning effort is a necessary predecessor to large scale improvements in conditions on the ground.

### ***Project 6***

The project "Watershed Approach to Water Quality Solutions" is entirely focused on water quality, emphasizing Santa Rita Creek, a water body with seven TMDL listings. As described in the Work Plan Introduction, the project will "focus outreach and referrals to leverage existing programs and funding for implementation of irrigation and nutrient management practices and the Livestock and Lands program. In addition, much needed management measures will control erosion from strawberry crops. Two restoration projects along Santa Rita Creek totaling 0.25 stream miles will promote environmental stewardship, reduce illegal dumping, stabilize banks and increase biofiltration of pollutants through revegetation of native plants."

The benefits are described further in Attachment 8, (proposal filename ATT8\_IG1\_WQOtherBen\_1of5). Water quality and other expected benefits are described on page 32 and 33 of this attachment with many examples of reduced nutrient and bacteria concentrations listed in Table 16 on pages 38 and 39, including quantitative estimates of reduced pollutant loading of sediment, nitrate and bacteria as a result of the project: "An estimated 70-90% less water will be used by growers and 20-50% reduction in pounds of nitrogen will be applied to fields. Manure management at small ranchettes along the creek is estimated to reduce 80% of fecal and nutrient contamination entering the creek." Specific pollutant load reductions are listed in Table 16 pages 38 and 39.

### ***Project 7***

Water quality benefits are also provided by the project Evaluation of Potential for Stormwater Toxicity Reduction by Low Impact Development (LID) Treatment Systems Water Quality benefits. Monterey County is undergoing urban development with much of that activity centered in and around the City of Salinas where the project will be conducted. The project will evaluate the ability of urban bioswales and other treatment systems to reduce toxicity as an important component of regional urban stormwater runoff. This investigation will help the City of Salinas, Monterey County and other communities as they prepare strategies related to stormwater management and aquatic life protection.

This concludes our response.