

Greater Monterey County Integrated Regional Water Management Disadvantaged Community and Tribal Needs Assessment

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Introduction

The Disadvantaged Community (DAC) and Tribal Needs Assessment is primarily informed by community outreach conducted by Jeanette Pantoja from California Rural Legal Assistance, Inc., (CRLA) as part of the Greater Monterey County Integrated Regional Water Management (GMC-IRWM) process and CRLA's Salinas Valley Safe Drinking Water (SVSDW) Project. Outreach and data collection leading to this Assessment took place over ten months, with the initiation of the Project in June 2012. The purpose of this Assessment is to document the needs of tribal and DAC communities as they relate to water management in the GMC IRWM planning region, thereby, informing future project development.

Barriers to Drinking Water and Wastewater Quality, Access, and Affordability

Drinking Water Quality

The Salinas Valley receives no "imported" water, except for Salinas River water, which originates in San Luis Obispo County. This can be both an asset, as Valley communities are not subjected to the state politicking that comes with reliance on water outside of their region, but it can also be an immense responsibility. Maintaining the region's water quality is of critical importance to communities in the Salinas Valley, especially to those who are small and low-income. In the Central Coast region, groundwater accounts for approximately 83 percent of the water supply used for agricultural, industrial, and urban purposes. That level jumps to nearly 100 percent for rural domestic purposes. The primary groundwater contaminants affecting disadvantaged communities in the Salinas Valley include nitrate and arsenic, but exposure to saltwater intrusion is an additional concern with particular consequences for North Monterey County residents.

Nitrate is the most common anthropogenic drinking water contaminant in California and is primarily attributed to percolation from irrigated cropland. Communities in the agriculture dominant Salinas Valley are particularly at risk of nitrate contamination of their drinking water. In March 2013, UC Davis published a study, "Addressing Nitrate in California's Drinking Water," which documented the extent of nitrate contamination in both the Salinas Valley and Tulare Lake Basin. Groundwater data cited by the study showed that 57% of the study area population relies on a community public water system with untreated nitrate concentrations above the drinking water standard of 45 mg/L. If existing trends in nitrate groundwater contamination continue, the percentage of people affected could increase to 80% by 2050. According to the study, public drinking water supplies in north, east, and central Salinas Valley are the most impacted. Outreach by CRLA staff revealed several DAC communities reliant on systems currently violating the nitrate Maximum Contaminant Level (MCL). A breakdown of nitrate contaminated drinking water systems in Monterey County is provided in Table 1.

Arsenic is the most common groundwater contaminant in the state of California and affects a multitude of systems in Monterey County. While arsenic is naturally occurring, the demand of water from domestic and agriculture uses may cause groundwater levels to drop and release arsenic from rock formations. This may certainly be the case in the Salinas Valley, where demand is currently not being compensated by groundwater recharge. Increasingly, municipal water systems are installing deeper wells in order to escape nitrate contamination and salt-water intrusion at the upper aquifers. In doing so, these systems risk running into increased levels of arsenic. For example, in 2007, the Castroville Community Services District drilled a new well into the Deep (900-foot) aquifer to reduce pumping from the shallower aquifers, which had been experiencing increased salinity due to saltwater intrusion. Soon after, monitoring of this new well indicated arsenic levels above the drinking water standard. A breakdown of arsenic contaminated drinking water systems in Monterey County is provided in Table 1.

Source of Monitoring Data	System Type	Timeframe of Monitoring Information	# of Systems Violating Nitrate MCL (45 mg/L)	# of Systems Violating Arsenic MCL (10 µg/L)
State Water Board Report “Communities That Rely on a Contaminated Groundwater Source for Drinking Water”	Community Water System (15+ connections or serving 25+ people)	2002-2011	10 systems serving 116,047 people	7 systems serving 125,417 people
Monterey County Environmental Health Drinking Water Program	State and Local Small Systems (2-14 connections)	2007-2011	145 of ~900 systems	75 of ~900 systems
GAMA Domestic Well Project	Private Wells (1 connection)	2011	9 of 79 samples	8 of 79 samples

Table 1. Drinking Water Monitoring Data by System Type

Access to Clean Drinking Water

DACs Reliant on Small Drinking Water Systems

Residents of small disadvantaged communities are distinctly susceptible to contamination of their drinking water for several reasons: (1) the drinking water systems upon which they rely are rural, (2) these systems are more likely to rely on a single well as a source, and (3) these residents cannot benefit from the economies of scale of a larger water system.

Rural drinking water systems in the Salinas Valley are vulnerable to contamination by surrounding agricultural practices and on a smaller scale, failing septic systems, forcing these communities to rely on bottled water for any number of years. Historic and intensive agricultural practices have contaminated drinking water in a large number of DACs, specifically labor camps, isolated trailer home groupings, and other types of unincorporated communities. In the rural North Monterey County, where drinking water wells and septic systems are densely situated, localized contamination of drinking water sources by failing septic systems is a well-known but poorly documented issue. Most of these communities rely on one well as their single source of water, and the resulting contamination has kept several of these communities on “do not drink” orders for years and even decades. DACs simply do not have the capital to drill another well as soon as their only source becomes contaminated and in many cases, the extent of contamination makes it difficult to find a non-contaminated source nearby. San Jerardo Cooperative now has to transport their water from a well source located two miles away from the community, because the onsite well became contaminated with nitrate and 1,2,3-tetrachloropropane. Furthermore, the cost of repairing, maintaining, and/or replacing a contaminated drinking water system is divided among a small number of users making it unaffordable to finance mitigation projects. Analysis of drinking water monitoring information collected by the County demonstrates increased vulnerability of smaller systems (Table 2).

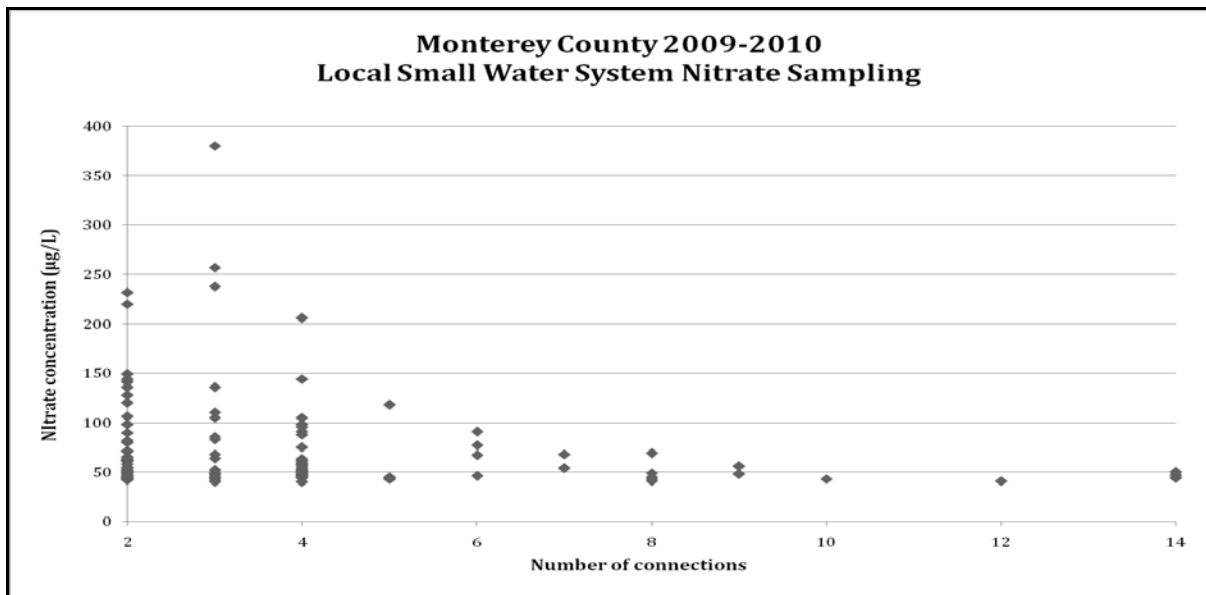


Table 2. Systems with the fewest connections experience the most acute contamination.

Language Barriers

According to US census data, 52.1% of Monterey County residents speak a language other than English at home. This percentage is likely much higher within the Salinas Valley because of the large Hispanic population. The percentage of residents born outside of the US is also higher in

Monterey County than in the rest of the state: 30.3% versus 27.2%. Indeed, the vast majority of DAC residents speak Spanish either exclusively or as their primary language. This language gap necessitates outreach and information that is both linguistically and culturally accessible.

Monterey County and, in particular, the Salinas Valley have also experienced an influx of non-Spanish speaking peoples emigrating from Mexico in recent years, which represent up to forty different indigenous languages. The most commonly spoken languages in these communities are Triqui and Mixteco, neither of which have a written form. Thus, the provision of outreach and information to these communities is especially challenging; it necessitates translators and undermines the effectiveness of written materials. Many organizations and services providers have begun to incorporate indigenous language translation into their outreach events and services, but the County has yet to adopt a broad strategy to provide services to this population.

The breadth of information about water quality, water management, and funding for both drinking water and wastewater infrastructure that is available in languages other than English is, unfortunately, limited, effectively barring many DAC residents from participating in processes that impact the quality of their drinking water and wastewater infrastructure. For example, annual Consumer Confidence Reports are often the only medium by which water systems communicate drinking water quality to their ratepayers, but Spanish language translations of these Reports are rarely available. Notices indicating a violation, such as exceeding a primary drinking water contaminant, are available in Spanish, but these notices employ technocratic language that is inaccessible to most DAC residents. As a result, DAC residents simply understand that they must not drink the tap water, but they fail to understand the health implications for which that recommendation was made or the alternatives available to their community.

Community Capacity

All residents in the Salinas Valley face decreased access to a healthy and reliable drinking water supply due to groundwater degradation; however, disadvantaged communities are disproportionately impacted in part due to chronic under-representation in decision-making processes affecting water management and related infrastructure investment. DACs face a number of barriers to effective participation, including, but not limited to: language access, lack of institutional knowledge, need to identify and empower leaders within the community, and lack of effective policies that facilitate their participation within agencies and stakeholder processes. Improved community understanding of the procedural and technical aspects of water management decision-making at local and regional levels will increase the capacity of DACs to advocate for equitable policies and community investments, but more outreach is necessary in order to realize those improvements on a broader scale.

Affordability

Expanding groundwater contamination and operating costs are increasingly making affordable drinking water and wastewater services more difficult to provide. California Department of Public Health's (CDPH) affordability threshold for drinking water rates as a percentage of Median Household Income (MHI) is set at 1.5%. Alternatively, USEPA's defines their affordability threshold as 2-2.5% for drinking water and wastewater rates combined. The reality for disadvantaged communities is starkly different. A 2011 Pacific Institute study, "The Human Costs of Nitrate-contaminated Drinking Water in the San Joaquin Valley," reported that residents in communities with contaminated drinking water spend an average of 4.6% of their income on drinking water, three times greater than the recommended expenditure by CDPH. Yet, even DACs without contamination of their delivered drinking water are experiencing skyrocketing rates. Some drinking water systems have been able to avoid contamination related violations due to the employment of expensive treatment technology. Even larger water systems, such as Cal Water are expending \$2 million a year to treat for nitrate contamination. Ratepayers, in turn absorb these costs, but many may struggle to afford rises in their utility rates.

The Operation and Maintenance (O&M) of a drinking water and/or wastewater system is an increasingly expensive endeavor. These systems struggle to cope with rises in energy, replacement or repair of aging infrastructure, drinking water or wastewater treatment, and compliance requirements. Small water systems in particular are handicapped by increased O&M costs because they lack the economies of scale by which to spread these costs (i.e., not as many ratepayers). For example, a typical financial audit of a water system is \$10,000-\$15,000. This cost may be insurmountable for a water system with a small number of ratepayers and resulting small annual budget. The DAC community of San Jerardo was able to implement a project to provide the community with clean drinking water, but ironically, residents in this community now pay rates averaging at \$125 per month compared the \$30 rates from before the project because the O&M for the new system is much more expensive. The state government has yet to devise a mechanism by which to assist DACs with their O&M costs but this burden needs to be a consideration when proposing a new infrastructure project in any DAC.

Technical Assistance and Capacity Development

Typically, small DACs lack the resources and technical background to develop and advocate for infrastructure projects, which in turn limits the extent to which they can participate in the project driven IRWM process. Technical assistance is critical not just for planning and project development, but also for overall DAC drinking water and wastewater system sustainability. A volunteer board comprised of members of the community often runs systems in small rural communities. These volunteers frequently take on this responsibility with a very limited understanding of drinking water and/or wastewater O&M necessitating substantial training and capacity development. Technical Assistance providers traditionally target their services at supporting Technical, Managerial, and Financial (TMF) Capacity of drinking water and

wastewater systems. Technical assistance needs of GMC IRWM disadvantaged communities are more comprehensively documented in Appendix 2.

Data Management

More robust regional groundwater monitoring and drinking water quality monitoring is necessary in order to accurately assess areas with a high risk of contamination and DACs at high risk of exposure. Ongoing disadvantaged community outreach has been conducted with drinking water and groundwater monitoring data that is often outdated, fragmented, and stored in a diverse and incompatible array of platforms. Some of the resources SVSDW Project staff has utilized to analyze regional drinking water quality includes reports by state agencies and universities, EPA Safe Drinking Water Information System (SDWIS), Monterey County Environmental Health records, and the State Water Board sponsored GeoTracker GAMA site.

Data pertaining to the smallest of drinking water systems (i.e. fewer than 15 connections) is particularly deficient, even though Monterey County Environmental Health Department is regarded as having one of the most comprehensive drinking water monitoring programs in the State. The County monitors both State Small (4-14 connections) and Local Small (2-4 connections), but the number of these system, ~900, makes consistent monitoring and the resulting data management a logistical challenge. Simply updating this information and mapping it would make outreach and support of these communities substantially more feasible.

Even less is known about private water systems (single connection), as these systems are subject to no regulatory oversight. Owners of these systems are solely responsible for monitoring and maintaining drinking water quality, but unfortunately, there is no way to verify that these residents are monitoring their water quality on a regular basis. Residents reliant on private well systems may be wholly unaware of contamination of their drinking water. While outreach to the private well community has been limited to presentations at local community forums where residents reliant on private wells have been present, SVSDW staff has utilized ambient groundwater monitoring information such as what is available through GeoTracker, to assess areas where residents may be at greater risk for contamination of their drinking water source.

Wastewater and Septic Systems

Many of the same issues that plague DAC drinking water systems also impact wastewater systems: aging infrastructure, low economies of scale, low technical and financial capacity, affordability, and insufficient data to accurately characterize the scale of the problem. The number of small disadvantaged communities reliant on failing septic systems and outdated centralized wastewater treatment systems is disproportionately high.

As changes to wastewater discharge requirements occur, many wastewater treatment systems are unable to meet the new water quality requirements. Wastewater plants serving rural DACs may be limited to just Primary or Secondary Treatment, which is often insufficient to properly protect

both the area receiving the system's discharge and public health of nearby communities. Upgrades and the added O&M are also often prohibitively expensive. Separate wastewater facilities serve the City of Salinas and adjacent community of Boronda (severely DAC). The facility serving Boronda is out of compliance and in need of significant upgrades, yet residents there pay three times more in wastewater rates than in neighboring Salinas.

When properly sited, designed, operated and maintained, septic systems effectively treat domestic wastewater to reduce its impact on the environment and protect public health. Unfortunately, outreach to disadvantaged communities has revealed numerous cases in which poor maintenance has resulted in failing septics and even cross-contamination of the drinking water well. Many DACs do not have the financial capacity to properly maintain a septic system and/or do not have the technical background to properly maintain it. Also, a chronic dearth of certified operators further intensifies this issue. Rural Community Assistance Corporation (RCAC) proposed a project to the IRWM group, which responds to a need for operators: "The Greater Monterey Bay Disadvantaged Community Wastewater Management Pilot Program...will create an on-going operation and maintenance program, including ground water monitoring, for selected disadvantaged communities that are served by individual septics that may not afford traditional sewer systems." While the project received a low score, the realized need for such a program merits a second look at the project. Modification of the project could possibly make it a better candidate for IRWM funds.

Tribal Culture and Autonomy

The GMC IRWM planning region includes at least two tribal governments: (1) the Salinan Tribe of south Monterey County and San Luis Obispo County and (2) the Esselen Tribe of Carmel Valley and north County. The Esselen Tribe is also represented under the name Ohlone/Costanoan-Esselen Nation (OCEN) and its members live throughout the Monterey Bay and Salinas Valley. Both the Salinan and OCEN communities have deep cultural and historical ties to the region's watersheds. SVSDW staff developed a partnership with OCEN Tribal government early in the outreach process and staff consults with the community's representatives on issues of tribal concern. Louise Ramirez, Tribal Chairwoman of OCEN and of Esselen descent, provided much of the content for this section of the assessment.

The Salinan and OCEN tribe have struggled for decades for Federal Recognition, without which they are seriously hindered in the protection of their cultural inheritance and further development as a tribal government. Federal recognition is often a prerequisite to eligibility for grants and other funding sources, making it difficult for these communities to finance the operations, cultural activities, and institutional participation of their tribal governments. Of greater relevance to water management, Federal Recognition also has serious consequences for representation of these communities under CEQA, the California Environmental Quality Act. Village, ceremonial, and ancestor burial sites are prevalent along coastal areas and vulnerable to disturbance by land-

use development and recreational collectors. At least in the context of the OCEN tribal government, the primary concern of these communities with regards to water management is the disturbance of these culturally sensitive sites. In the words of the Tribal Chairwoman, "...these burial sites are cemeteries, respect for our ancestors as you would expect respect for your deceased family members in today's cemeteries. Our definition of respect is *no* disturbance" (Appendix 3). Recognizing that some land-use development will occur regardless of tribal opposition, tribal governments rely on Tribal Monitoring for the protection of tribal remains/artifacts. Tribal Monitors may be required by CEQA as a means of mitigating the effects of construction and other land-use development on ancestral sites. If a tribal government is not federally recognized, the project developer can use any available tribal monitor. OCEN Chairwoman Louise Ramirez referenced a case in which one site developer used a "tribal" monitor indigenous to Mexico. Federal recognition ensures that a Tribal Monitor native to the area is utilized because the project developer must report the proposed project to the Native Heritage Commission, which will then inform the local tribal government representative.

Monitoring may often be necessary, but it should not be the first or primary option. Accepting monitoring operates on the assumption that the tribal community accepts the land-use development project as planned. Engaging tribal communities in the early steps of project planning is critical to ensuring that every means to protect ancestral sites has been explored and hopefully acquiring cooperation and/or consent on the development of projects and related planning efforts.

Conclusion

Tribal and disadvantaged communities face a multitude of barriers to effective participation in the IRWM and other water management processes. Historically marginalized, Central Coast tribal nations are dedicated to the preservation of their cultural heritage, but have limited capacity to engage in institutional processes affecting cultural sites and recognition of their communities. DACs, especially, struggle to respond to the contamination of their water system and/or failures of their wastewater system. They have limited technical and financial capacity, which interferes with their ability to plan, engineer, and finance infrastructure projects and/or develop applications for funding. Furthermore, the small economies of scale evident of small, rural water and wastewater systems only intensifies these challenges as they do not have the rate base to sustain the operation and maintenance of their infrastructure without exorbitant rate increases. The number of impacted communities will only continue to increase and currently there is not sufficient funding or technical support to return all these systems back to compliance, and maintain them there in a sustainable and affordable manner.

Recommendations

1. DAC and Tribal Representation on the IRWMG

DAC and Tribal participation in IRWM governance is essential to the development of projects and water management strategies that are equitable and representative of all GMC IRWM communities and stakeholders. Currently, there is no tribal representative in the IRWM governance body and the DAC IRWMG representatives feel ill equipped to accurately represent the needs and perspective of the OCEN and Salinan tribe. SVSDW and EJCW staff will continue outreach efforts to these communities and assess opportunities for more active engagement by their representatives.

2. Technical Assistance and Financing for Project/Application Development

Without technical assistance, DACs face insurmountable challenges in the competitive IRWM process. The GMC IRWM planning grant includes a set-aside fund for DAC technical assistance, but the current amount is insufficient to support more than one or two DAC project proposals. Even so, these funds do not cover MHI survey and application development, increasing the DAC's costs to participate and institutionalizing a "pay to play" framework. DWR must expand the amount and breadth of technical assistance in order to ensure that DAC projects are funded in future rounds of implementation grant funding. Furthermore, a change in reimbursement processes during the project implementation process from quarterly to monthly is more responsive to DACs limited financial capacity. DAC's do not have the reserves to pay contractors out of pocket and then wait four or five months to be reimbursed by DWR.

3. Wastewater and Drinking Water Data Management within GMC IRWM

The GMC IRWM is currently undertaking development of a comprehensive data management system that will integrate diverse water quality data and related environmental data sets. This system can either be expanded to include data relating to drinking water and wastewater or can be used as a starting point to develop a system to better manage data related to drinking water and wastewater systems. It should also be capable of integrating outreach and field findings, such as discovery of "hidden" DACs. Better coordination of these data will facilitate targeted outreach to small system communities, evaluation of regional projects, and anticipation of water quality risks to DACs.

4. Emphasis of Regional Projects

Moving forward, regionalization will be a central strategy in development of drinking water and wastewater projects for DACs. Small economies of scale and expanding groundwater contamination are making it increasingly unsustainable to maintain O&M costs. Water authorities, consolidations, and circuit riding operators are just three strategies that could be implemented in order to realize the benefits of regionalization. Regional Projects do not happen independently. Funding will need to be allocated in order to carry out outreach, mediate between communities and drinking water and wastewater systems, plan and analyze options, and coordinate the implementation of projects.

DAC and Tribal Needs Assessment Spreadsheet

Geo ID	Census Info	Med \$	Area Description	Water Supply System Name	Wastewater System Name	Water Supply/Quality Need	Funding Status
6053010101	Census Tract 1.01	39,570	Mc Closky Slough, just north of Moss Landing - out to Watsonville	Pajaro/Sunny Mesa CSD	Castroville CSD	Springfield Terrace community in violation of nitrate MCL since 1986; current levels register at 300ppm; current well also experiencing saltwater intrusion	In IRMWP for Round 2 Implementation Grant; no interim drinking water source
6053000300	Census Tract 3	47,449	City of Salinas area, bounded by Alvin Dr, N Main St., W Laurel Dr, El Camino Real	California Water Service Company	Monterey Regional Water Pollution Control Agency	None identified at this time.	N/A
6053000400	Census Tract 4	43,545	Salinas				
6053000501	Census Tract 5.01	24,395	City of Salinas area, just south of 5.02				
6053000502	Census Tract 5.02	44,245	City of Salinas area, bounded by E.Laurel Dr, Natividad Creek, El Camino Real, E.Alisal				
6053000600	Census Tract 6	32,766	City of Salinas area, bounded by Sanborn, Garner,				

			Williams, Market Way		
6053000701	Census Tract 7.01	26,888	City of Salinas area	ALCO Water Service Company	
6053000702	Census Tract 7.02	31,344	City of Salinas area		
6053000800	Census Tract 8	41,837	City of Salinas area, bounded by Sanborn, Williams, Alisal	California Water Service Company AND ALCO Water Service Company	
6053000900	Census Tract 9	40,077	City of Salinas area, south of Alisal	California Water Service Company	
6053001300	Census Tract 13	22,500	City of Salinas area		
6053001802	Census Tract 18.02	42,197	Salinas		
6053010400	Census Tract 104	44,286	King City area		King City
6053010506	Census Tract 105.06	40,924	Salinas		California Water Service Company
6053010804	Census Tract 108.04	42,314	Gonzales	City of Gonzales	City of Gonzales

6053011101	Census Tract 111.01	36,614	Area west of Soledad, bordered by Arroyo Seco Rd. and Tassajara Rd. (includes Cherokee Acres Mobile Home Park)	Cherokee Acres MHP and other small systems	Unknown	Currently has no Surface Water Treatment and is on Boil Water Notice	Mobile Home Park has design plan w/specs for surface water treatment but no funding to go forward; just recently moved from "W" (waived) category on PPL to "C" for CDPH SRF
6053011302	Census Tract 113.02	44,908	King City area	California Water Company	King City	None identified at this time.	N/A
607578	Boronda CDP	37,295	North Salinas	California Water Service Company	Boronda County Sanitation District	Sewer system is approximately 30 years old and the pump station control systems are obsolete and do not meet current operation standards; sanitary system experiences ongoing failures that result in emergency callouts	Reviewing funding opportunities: CDBG, CAA, SRF, & I-Bank; needs \$1.5 million for rehabilitation and \$100,000 for system evaluation before consolidating w/City of Salinas
611978	Castroville CDP	44,286	Castroville	Castroville CSD	Castroville CSD	None identified at this time.	Received IRWM Round 1 Implementation Grant
613364	Chualar CDP	48,516	South of Salinas	California Water Service Company	Chualar Community Services Area (County)	Parts of sewer system are over 50 years old; ongoing problems including pump station and force main failures; system located in floodplain	CDBG application pending \$200,000; reviewing funding opportunities such as CAA, SRF, & I-Bank; \$1.8 million needed for rehabilitation and long term funding needed for upgrades

664476	San Ardo CDP	48,000	South of King City	San Ardo Water District	San Ardo Water District	None identified at this time.	N/A
6053014800 1	Census Block 1	23,499*	Iverson & Jacks Labor Camp, area bounded by San Benito county line and highway 101	Iverson & Jacks Labor Camp	Iverson & Jacks Labor Camp	Only well in violation of nitrate MCL; no back-up source	Received SRF planning funds; currently doing feasibility study; interim drinking water is insufficient to meet need
6053011304 1	Census Block 1	42,500	San Lucas, area around King City and south of Greenfield - bounded by San Benito County line, HWY 198, HWY 101	San Lucas County Water District and Little Bear Water Company	San Lucas County Water District and Little Bear Water Company	San Lucas CWD only well in violation of nitrate MCL since March 2011; extreme levels of TDS; no back-up source	In IRMWP for Round 2 Implementation Grant; application pending for SRF planning grant; undergoing MHI survey
6053011204 1	Census Block 1	47,188	area around Greenfield - bounded by San Benito County line, HWY 146, Monroe Creek, Reliz Creek, and Arroyo Seco Rd.	City of Greenfield (some portion)	City of Greenfield (some portion)	None identified at this time.	N/A
6053011204 2	Census Block 2	57,750**	Rocha Labor Camp, Greenfield - bounded by 12th St, 14th St, Elm Ave, Walnut Ave	Apple Ave #03	Apple Ave #03	Only well in violation of nitrate MCL; no back-up source	CDPH SRF planning grant pending; possible consolidation with Greenfield
6053014601 2	Census Block 2	46,500	Moss Landing, Castroville - bounded by Elkhorn Slough, Railroad tracks,	Pajaro/Sunny Mesa CSD and Castroville CSD	Castroville CSD	None identified at this time.	N/A

			Tembladero Slough, Alisal Slough				
6053010101 2	Census Block 2	42,639	North of Moss Landing, Bounded by Pajaro River, HWY 1, Giberson Rd, Struve Rd	Pajaro/Sunny Mesa CSD	Castroville CSD	Includes Springfield Terrace community; water source in repeat violation of MCL	In IRWMP for Round 2 Implementation Grant Application
6053010804 3	Census Block 3	48750* **	South Gonzales; bounded by HWY 101, Gloria Rd, Alta St (but includes Alpine Court Labor Camp)	River Rd. #25	River Rd. #25	Only well in violation of nitrate MCL; no back-up source	In need of MHI survey; on CDPH SRF Project Priority List but no pending application known to exist
6053014603 1	Census Block 3	49,950	Las Lomas, bounded by Lewis Rd and Hall Rd	California Water Service Company	Pajaro Sanitation District operated by Monterey County Public Works	In need of Stormwater improvements; areas of community highly prone to flooding	Applied for inclusion to IRWMP for Round 2; redirected to Round 2 Stormwater Grant
*Iverson & Jacks has been determined a DAC by CDPH through an MHI Survey; DAC Mapping tool, however still lists as non-DAC							
**Apple Ave #03 (Rocha Camp) has been determined a DAC by CDPH through an MHI Survey; DAC Mapping tool, however still lists as non-DAC							
***Alpine Court Labor Camp mainly farmworker occupied with own water system; needs MHI survey; strong indication that it's a DAC							

Technical Assistance Categories	Category Narrative	Specific TA elements or services needed	Eligible Entities to Provide this Service and/or Training	Examples of Communities Where this TA is Ongoing or in Need
<p>Operations and Maintenance (O&M) / Technical, Managerial, and Financial (TMF) Capacity</p>	<p>O&M is the greatest barrier to drinking water system's long-term sustainability because associated costs are high and burdensome for systems with low economies of scale. Also, there is no funding mechanism of O&M. TMF Capacity is a means of assessing a systems ability to carry out its own O&M. CDPH SRF program has a set of mandatory TMF requirements before a funding contract can be granted. This often slows down the pace at which systems can implement projects to address violations.</p>	<ul style="list-style-type: none"> • Basic Operations (board members): Regulations, ethics, conflict of interest, and policy development; • Legal support for contracts, water rights issues, legal entity formation, etc. • Financial Management: rate setting, budgeting, asset management, accounting • Capital Improvement Plans and Funding Options • Operations and Emergency Response Plans 	<ul style="list-style-type: none"> • Traditional TA providers (e.g. RCAC, CRWA, AWWA) • Non-profits with relevant experience (e.g. United Way in Tulare Lake Basin has program to provide financial competency training for water system board members) • Professionals (such as Operators, Lawyers, Financial consultants) conducting pro-bono services 	<p>In February 2013, the San Lucas Water Board completed a TMF Assessment, which identified several TMF deficiencies. RCAC rural development specialist now working with Water Board and staff on addressing TMF needs</p>

		<ul style="list-style-type: none"> • Ongoing operator training to certify new operators and maintain existing operators up to date 		
Pre-planning and Project Development	DACs traditionally have low technical capacity making project planning/development and application formation difficult to orchestrate. DACs reliant on systems troubled by small economies of scale will benefit from regionalization but need the training and assistance to carry it forward.	<ul style="list-style-type: none"> • Training, mediation, and planning for regionalization • Legal and financial consultation for legal entity formation, water rights issues, etc. • Engineering, hydrology, and feasibility studies • Application development and writing 	<ul style="list-style-type: none"> • Non-profits and TA providers such as RCAC capable of working with communities on regionalization • Attorneys and financial consultants (?) • Engineers, hydrologists, and local/regional agencies with relevant water quality data • Non-profits and TA providers (e.g. CWRA, RCAC, and Nilsen & Associates) with experience developing and writing applications 	As part of the development of projects for Round 2, the GMC IRWM contracted with Nilsen & Associates to provide TA and conduct a feasibility analysis for the Pajaro/Sunny Mesa CSD in support Springfield Terrace. This project is in essence regional as one of the proposed feasibility scenarios included consolidation of several water systems within the original Springfield MWC, including several <15 connection systems.
Median Household Income (MHI) Surveys	MHI surveys are necessary where census data does not support characterization of a	Third-party entities are needed in order to conduct the actual surveys.	<ul style="list-style-type: none"> • RCAC contracts with CDPH to conduct 10 per year • Using CDPH guidelines, 	Alpine Court Labor Camp (River Rd #25) is not officially considered a DAC and requires an MHI survey

	community as a DAC. Mischaracterization is prevalent in rural areas where small DACs may be “hidden” in large census tracts.		non-profits and universities have also carried out these	for verification
Community Education and Leadership Development	Continuous outreach, education, and empowerment of DAC residents is needed to keep communities aware of potential risks and engaged in the management and decision-making processes affecting their drinking water and wastewater	<ul style="list-style-type: none"> • Translation services and linguistically and culturally accessible information • Leadership and advocacy training • Training focused on engagement in water management decision-making processes • Training for agencies and institutional stakeholders on cultural sensitivity and development of power-sharing and community engagement policies 	<ul style="list-style-type: none"> • Non-profits with local DAC outreach experience (e.g. United Way, CCA, CRLA, EJCW) • Traditional TA providers with curriculum focused on community capacity development (e.g. RCAC conducts a leadership institute holds several workshops throughout California themed “Board Basics”) 	Continuous outreach, training, and leadership development in San Lucas has resulted in the formation of a community association “La Voz de San Lucas.” The group is working with their water board to improve delivery of bottled water and complete and MHI survey that RCAC is conducting in the community.
Data Collection and	In order to provide systems with TA it is	<ul style="list-style-type: none"> • Accurate and up to date inventory of 	<ul style="list-style-type: none"> • CSU Fresno is working on inventory of 	Monterey County has 240 drinking water systems with

Management	imperative to know who and where they are in addition to any available information about their water quality. TA providers have voiced not having an accurate list of systems to be one of the greatest barriers in conducting outreach for their services.	<p>community water systems</p> <ul style="list-style-type: none"> • More comprehensive drinking water monitoring information for systems below 15 connections • Data management framework that incorporates drinking water monitoring with other forms of water quality monitoring 	<p>community water systems, but needs more funding/interns to expand scope and speed up process</p> <ul style="list-style-type: none"> • Coordination with Local Primacy Agencies, such as Monterey County Enviro. Health, Regional Boards, and other agencies carrying out water monitoring efforts can lead to framework 	<p>nitrate and arsenic contamination as of 2011. Outreach and TA providers have a very limited understanding of the geographic distribution of these systems or much else other than a sampling result.</p>
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Ohlone/Costanoan-Esselen Nation



Previously acknowledged as

The San Carlos Band of

Mission Indians

The Monterey Band

www.ohlonecostanoanesselenation.org.

January 19, 2011

(Insert Addressee)

Saleki Atsa,

I am the Tribal Chairperson for the Ohlone Costanoan Esselen Nation. I also represent the tribe to the Native American Heritage Commission and I act as the Most Likely Descendant for OCEN. As Most Likely Descendant I represent the OCEN Tribal Council's decisions regarding the treatment of ancestral Native American human remains and/or cultural resources that are often disturbed or encountered. I am the legal spokesperson for the OCEN Tribe and the Tribal Council. I may also be contacted for information for consultation, and reviewing planned projects for potential adverse impacts and reviewing predictive models that might negatively impact our Tribe's ancestral cemeteries, villages, ceremonial and processing sites.

As the aboriginal, historic and previously Federally Recognized Tribe of the Monterey Bay region, whose status has never been terminated by any Act of Congress from our relationship with the Federal Government, we insist that our legal and religious rights be respected and request that we are kept fully apprised of the activities of your office specifically as they relate to our ancestral, historical and cultural properties. Ohlone/Costanoan Esselen Nation has had a history of land-use throughout the Greater Monterey County.

Pacific Grove along the Asilomar coast line has been identified as culturally sensitive area. There are many areas including Point Pinos surrounded by registered cultural sites. Ohlone/Costanoan-Esselen Nation opposes any plan that allows for the disturbance of our sacred and cultural sites. Our sites have been disturbed in the name of progress and balancing budgets way to long.

Please be advised that it is our first priority that our ancestor's remains be protected and undisturbed. We desire that all cultural and sacred items be left with our ancestors on site or

where they are discovered. We ask for the respect that is afforded all of our current day deceased, by no other word these burial sites are cemeteries, respect for our ancestors as you would expect respect for your deceased family members in today's cemeteries. **Our definition of respect is no disturbance. We are aware that some situations require the relocation of our ancestors and request that Ohlone/Costanoan Esselen Nation be consulted to make that decision.**

We request that a sacred lands search be processed with the Northwest Information Center, Sonoma State University, Ms. Leigh Jordan can be contacted at (707) 664-0880 or at leigh.jordan@sonoma.edu and the Native American Heritage Commission in Sacramento, CA. At this time we are unable to provide you with cultural resource information but ask that OCEN be contacted upon any findings on this project.

We also request that Ohlone/Costanoan-Esselen Nation be consulted as to any planned projects that might adversely impact known or predicted cultural resources and sacred sites within our aboriginal territory. Furthermore, the Tribal leadership desires to be contacted about which archaeological consultants are selected to conduct: 1) surveys, 2) subsurface testing, 3) presence/absence testing, 4) mitigation and recovery programs, 5) reburial of any of our ancestral remains, 6) placement of all cultural items, and 7) that a Native American Monitor approved by the OCEN Tribal Council be used within our aboriginal territory.

We seek to be partners in the protection of our sacred sites. We request a copy of your findings regarding this project. Nimasianexelpasaleki. Thank you for your attention to this matter.

Sincerely and Respectfully Yours,

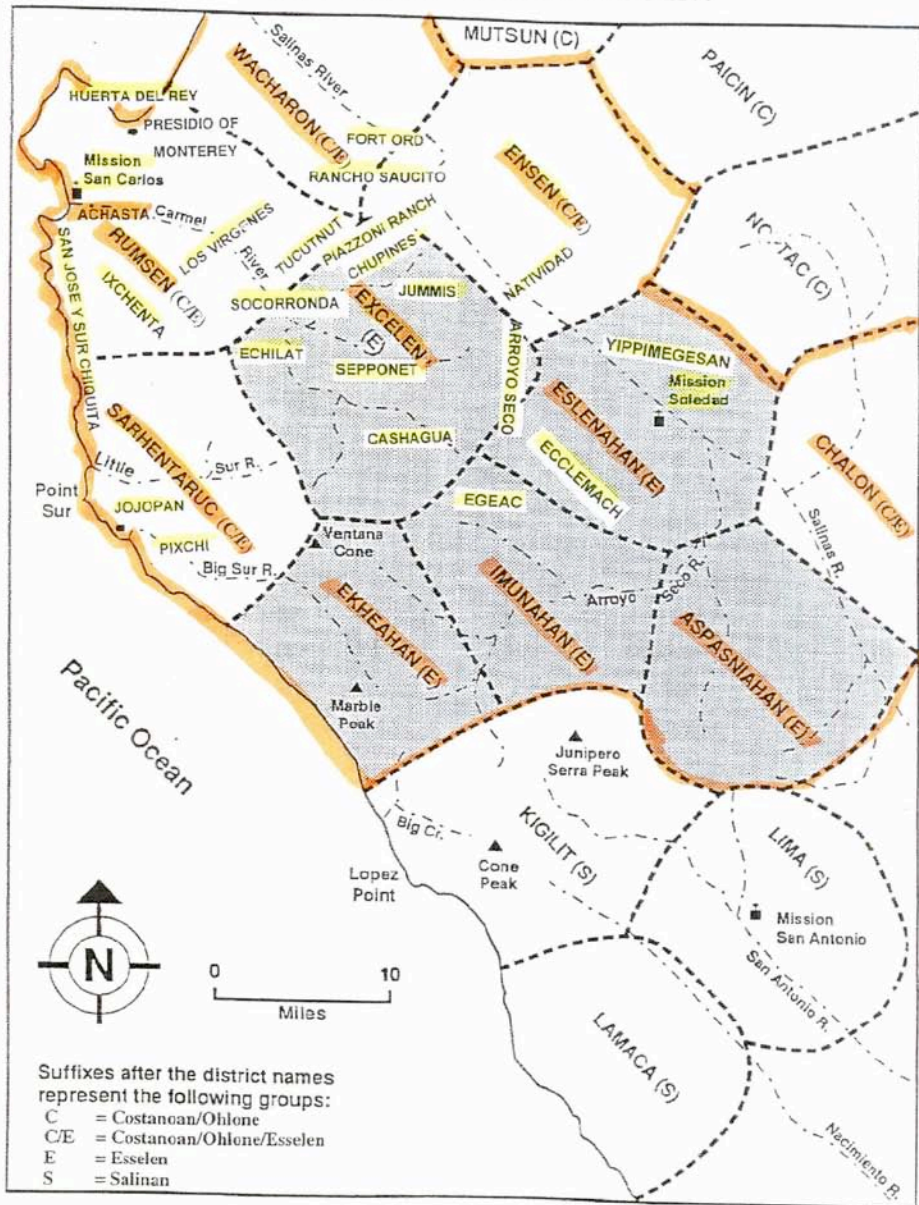
(Insert Signature)

Louise J. Miranda Ramirez, Chairperson

Ohlone/Costanoan Esselen Nation

(408) 629-5189

**Distribution of Ohlone/Costanoan-Esselen Nation Tribal
Rancherias, Districts, Landgrants and Historic Landmarks**
OCEAN DIRECT LINEAL DESCENT



Map after Taylor 1856; Levy 1973; Hester 1978; Milliken 1990

Figure 2: