

# ATTACHMENT 1

## Seaside Basin Watermaster Comment Letter

January 12, 2017

**Seaside Basin Watermaster  
P.O. Box 51502  
Pacific Grove, CA 93950  
(831) 641-0113**

January 12, 2017

Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401

**Subject:** Hearing Notice on Draft Waste Discharge Requirements Pure Water Monterey Groundwater Replenishment Project - Order No. R3-2017-0003

Dear Sirs:

The Seaside Basin Watermaster (Watermaster) is the Court-appointed manager of the adjudicated Seaside Groundwater Basin, into which the proposed Project will inject advance treated wastewater for groundwater replenishment.

The Watermaster is the Court-appointed body responsible for ensuring that the Basin is managed in accordance with the requirements set forth in the Seaside Basin Adjudication Order (Superior Court of the State of California in and for the County of Monterey, Case No. M66343). Therefore, it would be both appropriate and important that the Watermaster be informed directly (i.e. by both emails to its Technical Program Manager, and by direct U.S. Postal Service mailings to its administrative office) of the types of reports that the WDR requires be submitted periodically to various State agencies. Prompt and timely receipt of these reports is necessary to keep the Watermaster informed on issues affecting Basin management, water quality, public health issues, and other matters related to the Project.

The Watermaster has reviewed the Draft Waste Discharge Requirements you have prepared for this Project has the following comments and requests:

**Comments:**

1. In Section V of the Findings, paragraph number 30 states that the storage capacity of the “subbasin” is estimated to be 1,000,000 acre-feet. Our consultants have estimated that the storage capacity of the adjudicated Seaside Basin is approximately 52,000 acre-feet. The storage volume stated in the WDR appears to be significantly overstated.
2. In Section V of the Findings, paragraph number 31 states that the Seaside Groundwater Basin Salt and Nutrient Management Plan was submitted to the RWQCB by the Monterey Peninsula Water Management District in 2014, but has still not been adopted by the RWQCB. Please

explain what is preventing adoption of that Plan and what additional information or steps will be needed in order for it to be adopted.

3. Many of the Water Quality Goals listed in Table 1 (page 8) of the WDR are missing from the list of constituents in the Recycled Water Reinjection Discharge Limits in Table 4 (page 15) of the WDR. All of the goals should be included in that table, or required elsewhere in the WDR.

**Requests:**

1. That the WDR include language stating that all of the reports required under the Monitoring and Reporting Program (in Section I thereof) also be sent to the Watermaster at the same time they are sent to the RWQCB. Sending them directly to the Watermaster, rather than relying on other blanket forms of notification, will ensure that important information contained in those reports is not missed or delayed in receipt, so that the Watermaster can take response actions, if appropriate.
2. That a description of the monitoring program protocols required under Section II.3 of the Monitoring and Reporting Program also be sent to the Watermaster, for our use in preparing various reports and in compiling other information for our Annual Report to the Court.
3. Thank you for your consideration of our comments and requests. If you have any questions regarding them, please contact our Technical Program Manager, Mr. Robert Jaques, at (831) 375-0517 or by his email at [bobj83@comcast.net](mailto:bobj83@comcast.net).

Sincerely,

Robert S. Jaques

Technical Program Manager