July 8, 2002 Via Fax & Email (6 Pages)

Planning & Zoning Committee of the MidCoast Community Council
PO Box 64, Moss Beach
CA 94038
Serving 12,000 residents

To: **Supervisors Rich Gordon and Mark Church**
(Board of Supervisors Subcommittee on Wells)
Dean Petersen, Director, Environmental Health
Terry Burnes, Planning Administrator

re: **Comments regarding Phase II of MidCoast Aquifer Study**

Dear Supervisors Gordon and Church:

At the direction of the MidCoast Community Council, the Planning and Zoning Committee has compiled these comments and concerns regarding Phase II of the MidCoast Aquifer Study. As we move forward, there are 2 primary concerns that must be kept in perspective and managed in a comprehensive manner: We must demonstrate that public health is being protected in a proactive manner while minimizing potential damage to the environment.

We must continue to take into account other key factors in all decisions, research, analysis and future permitting of all water wells. Safe drinking water is our most health related natural resource – contamination of this resource can create long term health and environmental problems, the effects of which may take many years to discover. Every effort should be made to ensure the safety and protection of the aquifers serving MidCoast water users and agriculture while providing adequate fire suppression supply for current and future residents.

The data in this letter has been collected from:

- Public Testimony from the Community over the past two months,
- 1989 Montara-Moss Beach Water Well EIR Kleinfelder Report (KR),
- Balance Hydraulics Phase I Report (Literature and Data Review) of an Mateo County Mid-Coast Aquifers (PhIR),
- SMCo PLN2002-00256 Negative Declaration for Amendment to Well Ordinance (SMCoND),
- 6/12/02 Letter to Montara Sanitary District from Nicholas M. Johnson, Water Resources Consultant (MSD-NJ),
- California Environmental Quality Act (CEQA),
- Local Coastal Program (LCP).

We've divided our comments into two broad categories: (A) the scope and components of Phase II work, and (B) immediate concerns and considerations while Phase II work proceeds, although we recognize that many of these issues may be inter-related.

A. Scope and Components of Phase II work:

We agree with and support, at the minimum, the implementation of the suggested components that are listed on Page 16 of the Phase I report:

- Monitoring system planning, installation and data collection:
    - Several dozen wells, distributed amongst Mid-Coast study area, for aquifer testing and ongoing monitoring;
    - Water quality sampling for general minerals at key wells;
    - Streamflow and rainfall monitoring network of strategically-placed stations across the study area to optimize use of data for inter-basin correlation.
- Initial analysis and synthesis:
    - Water balances that estimate safe yield for each sub-basin;
    - Assessment of storage for each sub-basin that specifically addresses ground-water availability during extended drought periods;
    - Assess feasibility of recharge and conjunctive use, at preliminary level;
    - Identify surface sources suited to recharge ground water;
    - Identify areas where the aquifers are recharged by rainfall and those where the aquifers are recharged mainly by streams;
    - Identify areas where water quality is impaired, and how it affects aquifer development;
    - Relate rainfall to (a) onset of observed recharge, (b) development of saturated soils in the watershed;
    - Describe aquifer properties, using driller's logs, permit tests, and aquifer response.
- Reporting and community review:
    - Public outreach to convey results via newspapers;
    - Program brochure and website;
    - Public meeting.

Beyond these, we would also recommend that the Phase II work include:

- Comprehensive collection, analysis and presentation of available data:
    - Compilation of records from all well testing, both from new drillings and from retests at time of sale of property
    - Complete and publish an inventory of every well in the MidCoast area.
    - Accounting of all wells in SMCo that have recorded contamination or failed to provide adequate water supply
    - Graphing of all data recorded on water wells to include: time of year, flow, rate, chemical contents, etc

    - Analysis of existing literature and what additional field work needs to be done
- Coordination and sharing of efforts and data with Montara Sanitary District, Cal-Am Water, and Coastside County Water District
- Expanded examination of aquifer regeneration systems to encompass both short and long term effects, impacts and cycles
- Consideration and implementation of the alternative/complimentary approaches outlined on page 6 of Nicholas Johnson's May 30, 2002 letter to the Montara Sanitary District.
- Expansion of aquifer studying and modeling to include all levels of outflow instead of just extraction and pumping
- Examination and recommendation of methods for improving the recharge potential for the MidCoast watersheds:
    - Should we be considering some level of "unpaving"?
    - Can we collect rainwater more efficiently?
    - What about water conservation measures such as gray water recycling?
    - Should we be using grassy gutters for street drainage as opposed to asphalt/concrete?
    - What is the potential use and value of open space/undeveloped land for recharge?
- Expansion of the public participation to include a review committee (CAC or TAC) to provide more effective and timely public review and input regarding the process and developing proposals.

B. Immediate concerns and considerations while Phase II work proceeds:

The MidCoast Community Council continues to have deep concerns regarding the health, safety, and environmental consequences of current well permitting practices, even with the much-needed new requirements in the proposed amendment to the well ordinance. These concerns stem from the following considerations:

- The LCP was originally written with the assumption that the urban-area communities would have publicly monitored water available for all residents. As such, there was no real analysis of the impacts and effects of the extensive use of individual wells we are seeing today. This fact is underscored in Nicholas Johnson's June 12, 2002 follow-up letter to the Montara Sanitary District: *"Carl (California Department of Water Resources Chief Hydrologist Carl Hague) was surprised to learn that individual wells were being used to support new homes in San Mateo Midcoast suburban settings. He knew of no other situation. We agreed that, like septic tanks, domestic wells are truly most suitable for rural living."*

- The 1989 Montara-Moss Beach Water Well EIR (Kleinfelder Report) that was used to determine the feasibility of only 60 new wells did not account for any additional draw from the aquifer, and certainly not to the extent of the <u>hundreds</u> more that have been permitted since. In the final EIR that was adopted by the Board of Supervisors, the specified conditions of monitoring that were required

for LCP compliance have never been implemented, which would call into question the safety and legality of the original 60 wells and all subsequent ones.

- The amount and level of well drilling that occurred within the past five years would, if instituted under a single development project, certainly require a full environmental investigation under the requirements of CEQA. As in other areas concerning the cumulative impacts of accelerated individual parcel development, we are faced with a sub-division level of impacts without the examination and study normally required of such a level of activity

- Continuing indication and concern from residents and health-care workers of adverse-impacts and health-risks of declining water quality manifesting as above-average incidents of conditions related to excessive mineral and metal content (gallbladder conditions, kidney stones etc.)

- Concern about high levels of treatment of well water (water softeners, conditioners) that can cause caustic effects on metals and other materials having damaging effects on infrastructure and sewerage treatment facilities.

- The unregulated and unmonitored pumping and use of an undetermined wells within the urban area that have been permitted as "Agricultural Wells" and used for landscaping and possible extended residential water supply.

- The need for examination of long-range fire-suppression capability with the addition of large numbers of new residences without a corresponding increase of the water supply.

- The understanding that there is no requirement for current and future well users to connect to a municipal water supply when additional capacity becomes available. This means that this is not a temporary situation, but the institution of permanent impacts on the aquifers and the health and safety of the communities and the environment.

Any damage to the aquifers (excessive draw-down, salt water intrusion, mineral/metal concentration, chemical or other contamination) will have a dangerous impact to the majority of residents. Montara and Moss Beach have NO access to another public water source, CCWD has limited capacity to supply emergency connections, and both utilities depend on these same aquifers for significant amounts of their water supply. We feel that the public health and safety should not be put at even a minimal risk with so many unknowns during this process, and that the prudent course would be that no further water wells should be permitted into the aquifers that are currently serving the majority of residents served by Cal-Am Water and those used by CCWD.

We feel a number of immediate steps are necessary, and that many of these can be accomplished in conjunction with the work of the Phase II study:

- Focus first, and most intensely, on groundwater usage and monitoring (for domestic, business, and agricultural wells) in Montara and Moss Beach. The findings may determine whether any new wells should be permitted in these areas, especially those previously identified where water quantity and recharge potential appears limited and potentially problematic.

- Comprehensive collection and analysis of public health records to examine health risks that may be related to water; gallstone, kidney stones etc., and analysis of water quality beyond required minimum levels to determine if these levels may be inadequate in regards to long-term health risks.

- Utilize existing data and information for the protection of existing utility sources, well water users, public wells and agricultural wells:
    - Incorporation of new water usage data from Cal-Am available this month
    - Examination of available and subsequent data on current effects from water extraction on aquifers and associated riparian corridors, wetlands, environmentally sensitive areas, available volume & rates

- More comprehensive testing and monitoring for effects of mineral content (infrastructure and health)

- Adoption of the extended and more detailed pump testing outlined in Nicholas Johnson's letters to the Montara Sanitary District to ensure reliability of results regarding delivery capacity,

- Require interactive testing for areas where multiple wells, especially ones not yet in regular service, are grouped closely together.

- Require, if legally feasible, comprehensive disclosure and information of water well use, maintenance and testing on all property for sale.

- Require all private well users to connect to public water when available

- Institute a waiver of understanding that all well users have no guarantee of access to public water if their well should fail

- Institute a periodic and continuing testing program for water quality and quantity for individual residential wells

- Expand and improve education and notification programs for requirements and recommendations of domestic wells

- Implement the recommended watershed monitoring program and completion of requirements of the Kleinfelder report

We realize this is a rather extensive analysis and set of recommendations, and we thank you in advance for your careful consideration of these issues. This process has been a hectic experience, and we would certainly encourage, as noted above, the (re)institution of some level of review/advisory panel so that these issues and the resultant community-level feedback could be handled more effectively and given the proper and timely consideration it deserves. Thank you all for your work on this very important and critical issue.

For the MCC Planning & Zoning Committee,

Chuck Kozak
Chair, MidCoast Community Council
PO Box 370702
Montara, CA 94037
650.728.8237 - cgk@montara.com

Karen Wilson
Chair, Planning & Zoning Committee
PO Box 371273
Montara, CA 94037
650.728.3292 - Loordus@attbi.com

cc: MidCoast Community Council
Montara Sanitary District
Granada Sanitary District
Coastside County Water District
California Coastal Commission