



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
Monterey Bay National Marine Sanctuary
99 Pacific Street, Bld. 455A
Monterey, California 93940

April 26, 2016

Mr. Tom Luster
Energy, Ocean Resources, and Federal Consistency Division
California Coastal Commission
45 Fremont, Suite 2000
San Francisco, CA 94105

SUBJECT: NOAA's Monterey Bay National Marine Sanctuary Authorization of California Coastal Commission Coastal Development Permit Amendment No.: 9-14-1735-A2 and A-3-MRA-14-0050-A2 to California American Water Company to construct, operate and decommission a test slant well at the CEMEX site in the City of Marina, County of Monterey.

Dear Mr. Luster:

The National Oceanic and Atmospheric Administration's Monterey Bay National Marine Sanctuary (MBNMS) does not object to the California Coastal Commission's (CCC) decision to approve the Coastal Development Permit Amendments (CDP) 9-14-1735-A2 and A-3-MRA-14-0050-A2. MBNMS reviewed this permit amendment under its authority defined at 15 CFR Sections 922.49 and 922.134(b), and procedures defined in Section V.F of the Memorandum of Agreement on water quality protection within the Sanctuary.

On December 8, 2014, the California Coastal Commission (CCC) released the final signed Coastal Development Permit (CDP), which essentially allows: California American Water ("Cal-Am") to construct, operate and decommission a test slant well and associated monitoring wells at a previously disturbed area within the CEMEX site in the City of Marina. Cal-Am would use the test slant well to conduct a pumping and testing program over an approximately 24-month period to obtain data regarding the geologic, hydro-geologic, and water quality characteristics in aquifers underlying the project area. Cal-Am would use the data to help determine whether a subsurface intake system at or near this location could provide source water for a potential seawater desalination facility.

On February 29, 2016, Cal-Am reported that a portion of its discharge pipe had become exposed due to coastal erosion and a few days later, additional erosion and exposure to wave action caused a break in the most seaward 50 feet of the discharge pipe. As described below, Cal-Am has proposed that its permit be amended in two ways: first, to include additional monitoring for any exposed project components (Special Condition 6); and second, to modify its project description to include the measures it will use to reconnect its discharge pipe. CCC has determined that the requested project change described may be approved as an immaterial amendment which would result in a minor change to the approved CDP. An April 14, 2016 addendum further requested that when components of the discharge pipeline below the connection to the outfall are exposed, the Permittee shall conduct daily erosion monitoring, including photographic documentation of the exposed components, as well as hand measurements taken between the top of the manhole and the surface of the beach until the components are naturally reburied, after which erosion monitoring shall be done no less than once per week. When components are exposed, the Permittee shall inform MBNMS and CCC staff immediately and post notices as the nearest upcoast and downcoast access points to warn the public of the potential hazard.

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The Permittee shall provide monitoring records, photographs, and proof of the above public notices upon request.

At this time, our office does not have any additional requirements that need to be addressed as a result of this change to the Coastal Development Permit.

As federal National Environmental Policy Act (NEPA) lead, MBNMS needs to Authorize any changes made to this state agency permit. In accordance with NEPA (42 U.S.C. 4321 et seq.), an Environmental Assessment (EA) was prepared for this project, titled "Final Environmental Assessment for the California American Water Slant Test Well Project – September 2014." The subsequent Finding Of No Significant Impact (FONSI) followed on October 29, 2014. The FONSI determined the California American Water Slant Test Well Project will not significantly impact the quality of the human environment as described in the supporting Environmental Assessment. The CCC approval of the project, the subsequent amendments, as well as the Environmental Assessment, identifies a myriad of required mitigation and monitoring measures. This CCC amendment will not change any of those mitigation measures.

On the basis of conditions defined in the permit amendment, and all special conditions, mitigation measures, and monitoring requirements that are in effect, MBNMS does not object to the issuance of this Coastal Development Permit under §922.49. Please provide copies to MBNMS of any monitoring reports received by the CCC over the course of this project.

Please direct any correspondence or questions regarding this Letter of Authorization to Ms. Sophie De Beukelaer by phone at 831-647-1286 or via email at sophie.debeukelaer@noaa.gov. Thank you for your coordination with the Monterey Bay National Marine Sanctuary.

Sincerely,



PAUL MICHEL
Superintendent

cc: California America Water, Mr. Ian Crooks
Central Coast Regional Water Quality Control Board, Mr. John Robertson
United States Fish & Wildlife Service, Mr. Douglass M. Cooper

