



October 15, 2015

DEPARTMENT OF THE ARMY  
LOS ANGELES DISTRICT, US ARMY CORPS OF ENGINEERS  
REGULATORY DIVISION  
ATTN: Shanti Abichandani Santulli  
5900 La Place Court, Suite 100  
Carlsbad, CA 92008

Subject: Gregory Canyon Project – SPL-2010-00354-SAS

Dear Shanti:

The Rainbow Municipal Water District provides water and water reclamation services to an 80 square mile service area that borders the Gregory Canyon Project area. While the actual facility location is outside of our service area, we have significant concerns about the project. Specifically, we have concerns that the project as proposed poses a threat to vital groundwater supplies in our area.

Over the last several years, the District has undertaken a number of detailed studies of the underlying hydrogeology in this area. This project has defined the subsurface characteristics of the San Luis Rey Groundwater Basin in our area, specifically the Pala and Bonsall sub-basins. Groundwater flow in the San Luis Rey Groundwater Basin is characterized by an East to West flow of subsurface water, akin to an underground river that mirrors the flow of the San Luis Rey River above.

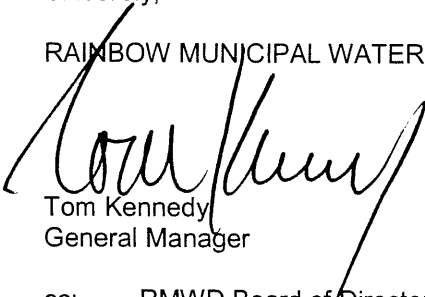
The location of the proposed landfill is such that any contaminants that leave the site will enter the Pala sub-basin. From there, the contamination will spread into the Bonsall sub-basin and potentially all the way into the Mission sub-basin in Oceanside.

These groundwater basins support a great deal of agricultural activity that would be seriously damaged by adverse effects on water quality. In addition, the Rainbow Municipal Water District is in the design phase of a groundwater extraction project that is an important part of our efforts to reduce our dependence on imported water and provide drought relief. The City of Oceanside also has a municipal groundwater facility that could be impacted by the release of contaminants from the landfill.

While the District supports the concept of appropriate and well sited solid waste management, we feel that this location is inappropriate for this sort of facility due to its proximity to a crucial groundwater basin. We request that the project application be denied.

Sincerely,

RAINBOW MUNICIPAL WATER DISTRICT



Tom Kennedy  
General Manager

cc: RMWD Board of Directors