

November 21, 2024

Monterey County Board of Supervisors
County of Monterey
168 West Alisal Street, 1st Floor
Salinas, CA 93901
COB@co.monterey.ca.us
carrolls@co.monterey.ca.us

Re: [Salinas Valley Groundwater Basin Investigation Report \(REF150103\)](#)
December 4, 2024 Public Hearing

Dear Members of the Board of Supervisors:

I write on behalf of LandWatch Monterey County regarding appropriate actions the Board should take in response to the study of conditions in Zone 2C required by General Plan Policy PS-3.1. The Board is to consider the matter at a December 4, 2024 public hearing.

In short, the Board should advise the Groundwater Sustainability Agency that it must act promptly to implement demand management in the 180/400-foot Aquifer Subbasin.

The study finds that all of the conditions identified in Policy PS-3.1 that trigger the Board's obligation to take "appropriate" action are in fact occurring: groundwater levels have fallen, seawater intrusion continues, and groundwater use in Zone 2C exceeds the use projected in the General Plan EIR. Some action is mandatory.

The report's most important recommendations for action are to reduce groundwater extraction, particularly near seawater intrusion. The report observes correctly that this option "requires planning, data, and engagement of interested parties."

Only by promptly reducing groundwater extractions through demand management measures in the 180/400-Foot Aquifer Subbasin can the County meet the interim milestones for seawater intrusion adopted for that subbasin under the Sustainable Groundwater Management Act (SGMA). Failure to meet that milestone risks a takeover of the SGMA process by the state Department of Water Resources.

The seawater intrusion milestone requires that seawater intrusion be halted at the 2017 line of advance by 2025 and rolled back thereafter. This means that the Groundwater Sustainability Agency (GSA) cannot wait another five or ten years to implement the

infrastructure-based solutions now under feasibility review; it must take the only action that can be taken immediately: demand management.

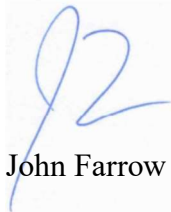
Indeed, the Groundwater Sustainability Plan (GSP) for the 180/400 acknowledges that demand management may be required on an interim basis to control seawater intrusion pending implementation of infrastructure-based projects. For that reason, section 9.4.1.5 of the 180/400 GSP calls for the GSA to be ready to implement pumping controls by 2025 by undertaking data collection and stakeholder outreach and by determining pumping allocations for each user in the period from 2020 to 2024.

Unfortunately, the GSA has taken a go-slow approach to demand management. At this point, the GSA does not intend to undertake the work needed to implement demand management in the 180/400 by 2025, i.e., to collect data and make pumping allocations. Even the preliminary stakeholder outreach to consider demand management has been delayed. Unless the Board or DWR lights a fire under the GSA, it is unlikely to be positioned to implement demand management for many years.

The most important contribution the Board of Supervisors can make to water management in the Salinas Valley is to persuade the GSA that it must urgently prioritize the data collection and pumping allocations needed to implement demand management in the 180/400, where seawater intrusion continues to advance and groundwater levels continue to fall. The Board should remind the GSA that the County has independent authority to regulate groundwater use outside of the SGMA process. The Board should tell the GSA that if it does not act, the County will act to implement demand management using its independent authority.

Yours sincerely,

M. R. WOLFE & ASSOCIATES, P.C.

A handwritten signature in blue ink, appearing to be 'JF', is written over a light blue rectangular background.

John Farrow

JHF:hs

Cc: Shandy Carroll
Piret Harmon
Michael D. DeLapa
Laura Davis