



August 13, 2024

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Re: Joint Water Resources/Board of Supervisors Leadership Committee

Dear Members of the Joint Leadership Committee:

LandWatch suggests direction and priorities for two items on your August 15 agenda.

**1. Interlake Tunnel (ILT) grant funding deliverables status and direction to staff**

In LandWatch's March 2023 comments on the draft EIR, we made the following points:

- The project modeling shows groundwater benefits to the southern subbasins, where these benefits are not needed according to the Groundwater Sustainability Plans (GSPs) for the southern subbasins, and no benefits to the northern subbasins, where additional water is needed. DEIR comments by some southern agricultural interests make the point that they would not be willing to pay for a project they do not need. It would be difficult to demonstrate benefits in a proposition 218 engineers report to the southern subbasins if they do not need the additional recharge or to demonstrate benefits to the northern subbasins if they enjoy no material recharge from the project and it interferes with more promising uses of surface waters in their GSPs.
- The project is predicated on a reservoir release plan that is inconsistent with GSPs for the northern subbasins, which propose to move more water north in the winter through reservoir reoperation and to use that water for direct urban consumption or aquifer storage and recovery. The DEIR fails to disclose these inconsistencies.

- The DEIR groundwater modeling is inadequate because it does not illuminate seasonal flow differences, which matters to the GSP plans for reservoir reoperation to increase winter flows.

None of these points has been addressed in public communications. Despite the passage of a year and a half since the closure of the DEIR comment period, no final EIR has been released.

Any further assessment of the ILT should be integrated with the feasibility studies of projects and management actions now being undertaken by the Salinas Valley Basin Groundwater Sustainability Agency (GSA). It makes little sense for MCWRA to be independently pursuing a major capital project without coordination with the GSA. For example, the failure of the DEIR to disclose and assess the inconsistency of the ILT with the GSA's plans and its failure to provide adequate modeling in what must have been a very expensive EIR not only violates CEQA but wastes public resources.

## **2. Update on dam safety funding and direction to staff**

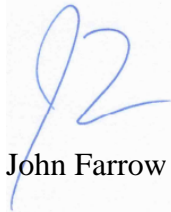
In February 2021, LandWatch commented that the draft Engineers Report for the dam safety project was inadequate to support a proposition 218 vote. For example, we pointed out that there was no justification for assuming benefits to Toro and Prunedale, that the boundary of the assessment areas was not justified, and that there had been insufficient assessment of lower cost alternatives. Comments by agricultural interests also objected to the lack of substantial evidence to justify the assignment of benefits to various areas, noting, for example, the inconsistency of the dam safety project Engineers Report with the Engineers Report for the Salinas Valley Water Project. The result was that the County decided not to issue the flawed draft Engineers Report even though that would require postponement of the Proposition 218 vote for a year.

Three years later and we are unaware of any progress on an adequate Engineers Report. If this essential remedial project is to move forward, the County must prioritize preparation of an adequate report.

Thank you for your consideration of our comments.

Yours sincerely,

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



John Farrow

JHF:hs

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Laura Davis