



May 13, 2020

Ron Stefani, Chairperson
Members of the Board of Directors
Salinas Valley Basin Groundwater Sustainability Agency
P.O. Box 1350
Carmel Valley, CA 93924
Via email meyersd@svbgsa.org, camela@svbgsa.org

Subject: Agenda Item: 6.b. Receive Report on Proposed Update to Ordinance No. 5303
by County of Monterey

Dear Chair Stefani and Members of the Board of Directors:

We recommend that the Board of Directors seek to strengthen Ordinance No. 5303 to prevent additional "replacement wells" currently permitted by the ordinance.

Your staff report indicates that in a report presented to the Water Resource Agency Basin Management Committee on May 6, 2020, Howard Franklin, Senior Hydrologist, said the number of wells that have been constructed as replacement wells allowed under Ordinance 5303 is seven, with four more wells having permits but not yet constructed. Reportedly, Mr. Franklin estimates that **the new replacement wells will conservatively pump 2,300 acre-feet per year of new water, or a 23% increase.**

The 2003 WRIME study said pumping over 8,000 AFY from the Deep Aquifer would induce seawater intrusion in the upper aquifers. **By 2016, Deep Aquifer extractions had already increased from 2,151 AFY in 1999 to 8,901 AFY.** (See MCWRA, Recommendations to Address the Expansion of Seawater Intrusion in the Salinas Valley Groundwater Basin, Oct. 2017, p. 52, available at <https://www.co.monterey.ca.us/home/showdocument?id=57394>.) Mr. Franklin's report indicates that Deep Aquifer Pumping has increased substantially since 2016.

Franklin's estimate that a 2300 AFY increase from replacement wells will be a 23% increase implies that total pumping will soon be 12,300 AFY. Regardless of the precise number, it is clear that Deep Aquifer pumping now substantially exceeds the level that WRIME found would induce seawater intrusion in the upper aquifers.

Unlike the 400-Foot Aquifer, the Deep Aquifers are not connected to Monterey Bay and have not yet been found to be intruded by seawater. However, the Deep Aquifers are at risk for seawater intrusion because they are connected to the 400 Foot and 180-Foot Aquifers by well perforations that permit leakage or vertical migration of groundwater from these upper aquifers. Furthermore, there is no known source of recharge to the Deep Aquifers other than this migration. Thus, pumping from the Deep Aquifers

- induces leakage from the 180-Foot and 400-Foot Aquifers into the Deep Aquifers,
- lowers groundwater in the 180-Foot, 400-Foot Aquifers, and Deep Aquifers,

- induces seawater intrusion into the 180-Foot and 400-Foot Aquifers,
- depletes the Deep Aquifers themselves, and
- puts the Deep Aquifers at risk of salination from vertical migration of seawater intruded waters from the 180-Foot and 400-Foot Aquifers.

Based on these data, we strongly recommend that no further replacement wells be permitted in the Deep Aquifer.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael DeLapa". The signature is fluid and cursive, with the first name "Michael" and last name "DeLapa" clearly distinguishable.

Michael DeLapa
Executive Director