



***Grower-Shipper Association of Central California***  
***“OUR MEMBERS: PARTNERS PRODUCING PROSPERITY”***

November 16, 2018

Mark Gonzales, Chair of the Board  
David Chardavoyne, General Manager  
Monterey County Water Resources Agency  
1441 Schilling Place  
Salinas, CA 93901

SUBJECT: November 19, 2018 MCWRA Agenda Item 12 Re: Biological Opinion Re-Initiation

Dear Chair Gonzales and Mr. Chardavoyne,

We are aware of the importance of National Marine Fisheries Services' (NMFS) re-initiation of the Biological Opinion (BO) for the Salinas Valley Water Project, and appreciate Monterey County Water Resources Agency (MCWRA) staff's recent updates on the progress of these discussions. We understand that the question of how to best manage around dry season flows to allow for fish passage during consecutive dry years is challenging, and that this is the basis for the discussion around the re-initiated consultation and pending biological opinion at your November 19 meeting.

We appreciate that MCWRA staff are considering multiple options and developing different alternatives to address Steelhead health in the river, while also taking into account stakeholder concerns about the feasibility and unintended consequences potentially inherent to proceeding with the idea presented at the October 15 MCWRA meeting regarding holding water back during times of two consecutive drought years. Our membership has considerable concerns about what this action might mean to groundwater recharge in dry years. We've also heard substantial skepticism that this management idea would actually get to the intended goal as it relates to steelhead runs due to the uncertainty of Arroyo Seco flows and our members' historical experiences in the region. We are not convinced this is being developed using the best available science. Requiring a hold-back following each dry winter would have detrimental affects on groundwater recharge throughout the Salinas Valley, affecting well recharge and basin sustainability throughout the region.

Our organization is committed to being a partner to MCWRA and NMFS as work begins on a long-term plan for the Salinas River system and a Habitat Conservation Plan. We have also been an active participant in the development of a Sustainable Groundwater Management Act (SGMA) Agency for the Salinas Valley Groundwater Basin. We understand the importance of finding management tools that have multi-benefit outcomes and positively influence the needs of steelhead, farmers and our communities. We encourage you to consider how the HCP and the SGMA activities will work in tandem.

We appreciate that the staff report encourages further research into the option presented on October 15, regarding two-year hold backs with the intent of getting to approximately 100 cubic feet per second (cfs) at the Spreckels gauge for 15 days in the third year, and recognizes CEQA obligations. This option is very concerning to us and our members and we ask that you look to other solutions. It is not clear to us that this proposal reflects the best available science or a robust consideration of many alternatives for improving fish habitat and survival. We also ask you to consider extending the current BO or, at a minimum, extend the timing for input into the next BO in lieu of making substantial changes at this time to reservoir management. As you know, the SGMA process is underway and new plans are being developed with an emphasis on sustainable management of our basins, which should benefit not only our aquifers but also our system as a whole. That, alongside the upcoming HCP process and its associated plan, will substantially affect management of this system in the coming years. We implore the MCWRA and NMFS to allow for a transparent and public process for the stakeholders to come together and bring forward solutions in that process rather than proceeding with the two-year hold back idea that was presented at your October 15 Board meeting.

In conclusion, if NMFS is unwilling to consider an extension of the current biological opinion, we request, at a minimum, that MCWRA and NMFS take the time to consider multiple options in a more public forum, with input from the farming community who are significantly affected by such proposals. We ask that a stronger public process be initiated that delves more publically and comprehensively into all of the options that have been discussed by MCWRA and NMFS. More time is necessary to discuss all options and potential consequences of those and we highly encourage that the current trajectory for this process, which would culminate in a new management plan by this winter, be halted to further develop a plan that makes sense for all river stakeholders. We look forward to working with you and the federal agencies in a process that considers many perspectives and a fully vetted BO and HCP process.

Sincerely,



Abby Taylor-Silva  
Vice President, Grower-Shipper Association of Central California

cc:

The Honorable Congressman Jimmy Panetta  
The Honorable Monterey County Supervisor Luis Alejo, Board Chair  
The Honorable Monterey County Supervisor John Phillips  
The Honorable Monterey County Supervisor Simón Salinas  
The Honorable Monterey County Supervisor Jane Parker  
The Honorable Monterey County Supervisor Mary Adams  
Bill Stevens, National Marine Fisheries Service  
Lew Bauman, County Administrative Officer, County of Monterey  
Alice Henault, Senior Secretary, Monterey County Water Resources Agency