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**Sent:** Thursday, May 21, 2026 4:34 PM

**To:** Clerks <clerk@svbgsa.org>; ClerkoftheBoard <cob@countyofmonterey.gov>; MC Water <OfficeAssistantII@countyofmonterey.gov>

**Cc:** Piret Harmon <harmonp@svbgsa.org>; Azhderian, Ara <AzhderianA@countyofmonterey.gov>; Daniels, Kate <DanielsK@countyofmonterey.gov>

**Subject:** General Public Comment RE May 18, 2026 SVBGSA & MCWRA Joint Board Workshop for Distribution and Record Placement

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Dear Clerks,

Please accept the attached public comment for placement in the appropriate public records and distribution to the Board of Supervisors, the Monterey County Water Resources Agency Board of Directors, the Salinas Valley Basin Groundwater Sustainability Agency Board of Directors, the MCWRA Water Resources Advisory Committee, the SVBGSA Advisory Committee, and all six SVBGSA Subbasin Implementation Advisory Committees.

The comment concerns the disparity between the Friday SVBGSA Advisory Committee guardrails and the Monday SVBGSA & MCWRA Joint Board Workshop discussion, and requests that near-term PMA portfolio

evaluation remain tied to decision-grade, modelable, costed, and agency-assigned implementation actions.

Thank you for your assistance in distributing and filing this comment.

Sincerely,

Bill Lipe

Member of the Public and 180/400 resident

Salinas, 93908

# Friday's Guardrails, the SVBGSA & MCWRA Joint Board Workshop, and the Need to Keep the PMA Process Decision-Grade

*Prepared for public record submission*

**Core standard:** The Board should credit only PMA claims that identify who leads, what is implemented, where the benefit occurs, what it costs, and whether it meets existing seawater-intrusion thresholds.

## Opening

Chair, Board Members, Committee Members, and Staff,

I am submitting this comment to address the disparity between the Friday SVBGSA Advisory Committee meeting and the Monday SVBGSA & MCWRA Joint Board Workshop.

Friday's meeting narrowed the process. Staff made clear that the agency has limited capacity to model only a small number of scenarios, that brand-new ideas cannot be engineered and costed in time, and that the near-term portfolio work needs to stay within the current universe of feasibility-studied PMAs or closely related modelable variations.

The Monday SVBGSA & MCWRA Joint Board Workshop, by contrast, reopened several ideas that may be interesting, but are not yet decision-grade. They should not be credited as implementation solutions unless they can be defined, assigned to the correct agency, costed, modeled, and tied to measurable seawater-intrusion benefit.

### 1. Undefined City of Salinas Project

The supposed City of Salinas project remains undefined.

Mayor Dennis Donohue was asked about the specifics and could not articulate what the project actually is. Less than ninety days from a major decision intersection, that indicates there is no decision-grade project on the table.

Until the public knows the source, yield, service area, cost, schedule, responsible agency, and relationship to seawater intrusion, that project should not be counted as part of the implementation portfolio. A project that cannot be described cannot be credited.

### 2. Minimum Threshold Changes Are Not a Substitute for PMAs

Minimum Threshold changes should not be treated as a solution.

Even if DWR might consider them, the Friday discussion made clear that threshold changes still require a project and a plan. Changing the target is not the same as meeting the target.

The Salinas Basin Water Alliance is still at least a month away from completing modeling and details on whatever project it is developing. From what has been described so far, that effort appears focused on water

supply, not on repairing or reversing the seawater intrusion caused by roughly eighty years of coastal pumping stress.

DWR will not accept a supply-replacement story alone if it does not also provide a credible PMA pathway to address the existing seawater-intrusion problem.

### **3. Permit 11043, MCWRA Lead Responsibility, and Yield Uncertainty**

Permit 11043 needs to be placed with the correct lead agency.

The record indicates that 11043 is an MCWRA water-right pathway, not an SVBGSA-controlled permit. If streamlining or modification is discussed, MCWRA should lead that effort, with SVBGSA coordinating where appropriate.

Even then, the portfolio still has to disclose how much water any project can actually yield, given volatile flows, operational constraints, and the 400 cfs maximum limit. “Water supply” is not enough. The question is whether that supply can be reliably delivered, where it offsets pumping, what it costs, what it costs to operate, and whether it helps meet the existing seawater-intrusion thresholds.

### **4. Crop-Change Claims Are Not Demand-Management Credit Without Net Pumping Reduction**

Crop-change or acreage-change claims should not be counted as demand-management credit without proof of net pumping reduction.

Removing wine grapes does not create a water credit if those acres are converted to lettuce, broccoli, cauliflower, or other irrigated produce. Many of those acres appear to be replaced or operated by northern landowners and operators connected with the Salinas Basin Water Alliance.

If the water is still being pumped, there is no credit to claim. And even if pumping is reduced somewhere else in the Valley, that is not equivalent to reducing pumping in the critically overdrafted coastal 180/400 area where the seawater-intrusion stress is occurring.

### **5. Supply Alone Does Not Repair Existing Seawater Intrusion**

Surface-water supply discussions need to be tied to the actual DWR problem.

The issue is not merely whether additional supply can be found. Supply is important, but DWR is expecting PMAs that address and help fix existing seawater intrusion. A supply-only approach does not necessarily repair the chloride-front problem, reverse damage, or reduce the hydraulic stress that created the condition.

A modelable PMA must identify the water right, diversion point, storage or delivery mechanism, conveyance path, permitting strategy, cost, annual O&M, dry-year reliability, and the actual seawater-intrusion performance benefit. Without those elements, it is not decision-grade.

### **6. Well Fields May Be Interesting, but They Are Outside the Current Guardrails**

Well fields and new conveyance concepts may be historically familiar and may be worth future study.

Some in the Salinas Basin Water Alliance have suggested that well fields are an historically accurate way to help with water supply. That may be true as a concept. But SVBGSA and MCWRA have not studied those well fields sufficiently for this decision window.

Unless staff can define, engineer, cost, permit, and model them now, they are outside the Friday guardrails. For the immediate portfolio decision, they are a dead end, even if they remain possible long-term concepts.

## 7. Demand Management Must Be Modeled as a Stress-Reduction Tool

Demand management should not be minimized simply because it cannot solve seawater intrusion by itself.

That is the wrong test. Demand management should be modeled as a hydraulic stress-reduction tool that may reduce the required size, cost, and operating burden of barrier and supply projects.

The correct conclusion is not: demand management cannot solve seawater intrusion alone, so defer it. The correct conclusion is: demand management cannot solve seawater intrusion alone, so model it with supply and barrier PMAs.

That is the limited role of Portfolio Breakwater here. It is not meant to dominate this comment or add another speculative idea. It is simply an example of the kind of disciplined framework the Board should require: a small number of modelable scenarios, existing thresholds held constant, responsible agencies identified, capital cost and annual O&M disclosed, and performance measured against seawater-intrusion outcomes rather than just water volume.

## Decision-Grade Standard

The Monday SVBGSA & MCWRA Joint Board Workshop confirmed the need for public education, but it should not reset the process to open-ended brainstorming.

The Board should not credit undefined projects, speculative supply, unverified acreage changes, misassigned agency responsibilities, or threshold changes as if they are equivalent to modeled PMAs.

The standard should be simple:

1. Who leads?
2. What is actually being implemented?
3. How much pumping is reduced or water is supplied?
4. Where does the benefit occur?
5. When does it occur?
6. What does it cost to build and operate?
7. Does it meet the existing seawater-intrusion thresholds?

## Closing

That is the decision-grade record SVBGSA needs now.

Not the smallest project that fails. Not the largest project by default. Not a water-supply story that ignores the existing seawater-intrusion damage.

**Closing principle:** The agency needs the lowest-cost complete portfolio that actually works.

Thank you.

Bill Lipe  
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