



CALIFORNIA DEPARTMENT OF WATER RESOURCES

SUSTAINABLE GROUNDWATER MANAGEMENT OFFICE

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December 1, 2025

Piret Harmon
Salinas Valley Basin GSA
1441 Schilling Place
Salinas, CA 93901
harmonp@svbgsa.org

RE: Salinas Valley – 180/400 Foot Aquifer Subbasin (No. 3-004.01) – 2025 Periodic Review – Additional Information Request

Dear Piret Harmon,

The Department of Water Resources (Department) is conducting its periodic review of the 2025 Periodic Evaluation and 2022 Amended Groundwater Sustainability Plan (GSP or Plan) for the Salinas Valley – 180/400 Foot Aquifer Subbasin (Subbasin). The GSP Regulations allows the Department to request information deemed necessary to evaluate the progress toward achieving the sustainability goal and the potential for adverse effects on adjacent basins. (23 CCR 355.6(e)). Accordingly, to complete the periodic review, the Department is requesting a meeting to discuss the need for additional information regarding the following topics:

1. Seawater Intrusion Advancement:
 - Clarify which actions being taken given that undesirable results are occurring, declining groundwater levels are contributing to seawater intrusion, and supply wells are being impacted by seawater intrusion.
2. Projects and Management Actions:
 - Provide clear path of implementing projects and management actions necessary to halt and mitigate seawater intrusion, declining groundwater levels, and overdraft, to achieve sustainability by 2040.
3. Reduction of Groundwater Storage:
 - Clarify the revised calculation to assess sustainable management criteria for reduction of groundwater storage.
4. Degraded Water Quality:
 - Clarify actions being taken with the Water Quality Coordination Group regarding minimum threshold exceedances observed over the past five years.
 - Provide rationale for excluding small water systems from the evaluation of degraded water quality.

In the meeting, Department staff will provide further specific details regarding each of the topics listed above and the documentation and information needed to complete our review. In addition, the GSA's approach to interconnected surface water is still being considered. The results of this analysis may require interconnected surface water to be a topic of discussion in the meeting as well. GSA is not expected to respond at the initial meeting to this request, however unless the requested information is provided the Department may not be able to fully evaluate the GSP. After discussing these items at the meeting, Department staff will work with you to establish a reasonable schedule for providing the necessary additional material, the process of submitting this additional material, and the potential for scheduling an additional follow-up meeting.

Please contact me at monica.salais@water.ca.gov to set up this meeting no later than December 15, 2025.

Thank You,

Monica Salais

Monica Salais, PE
Supervising Water Resources Engineer
Groundwater Sustainable Review Section Lead
Sustainable Groundwater Management Office

180/400-Foot Aquifer Subbasin 2025 Periodic Review Additional Information

Basin No. 3-004.01



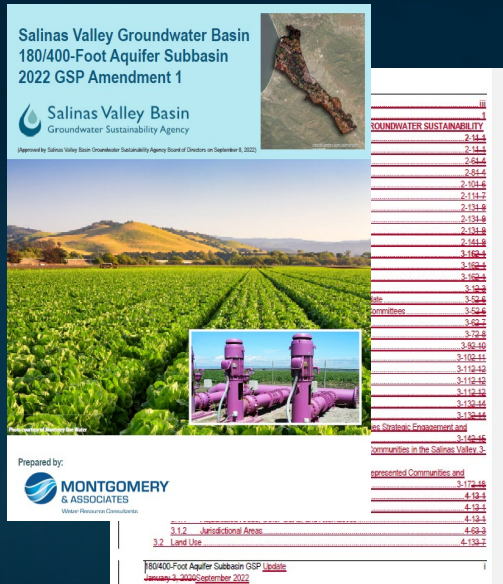
CALIFORNIA DEPARTMENT OF WATER RESOURCES
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Agenda Topics

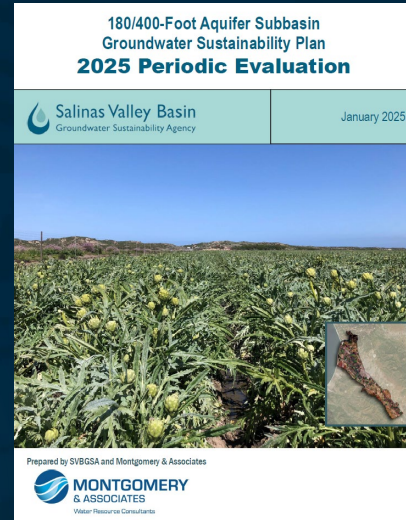
1. Seawater Intrusion Advancement
2. Projects and Management Actions (PMAs) and Lack of Implementation
3. Reduction of Groundwater Storage – Revised Calculations for Assessing Sustainable Management Criteria (SMC)
4. Degraded Water Quality – Exclusion of Small Water Systems and Minimum Threshold (MT) Exceedances

Documents Included In the Periodic Review

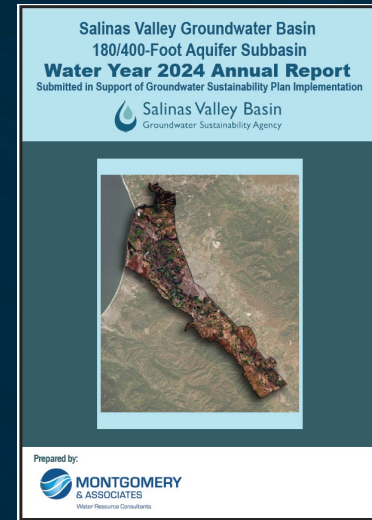
2022 Amended GSP



2025 Periodic Evaluation

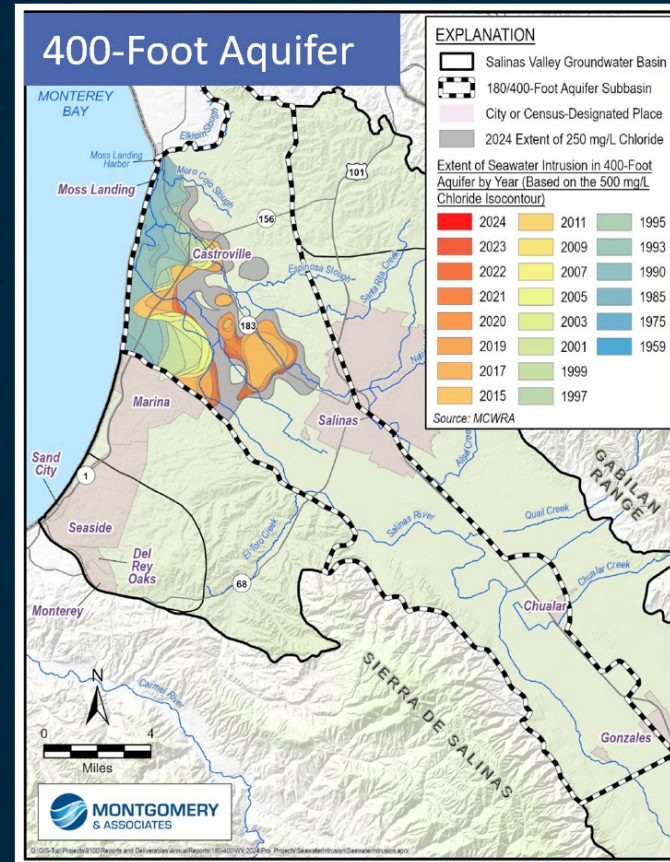
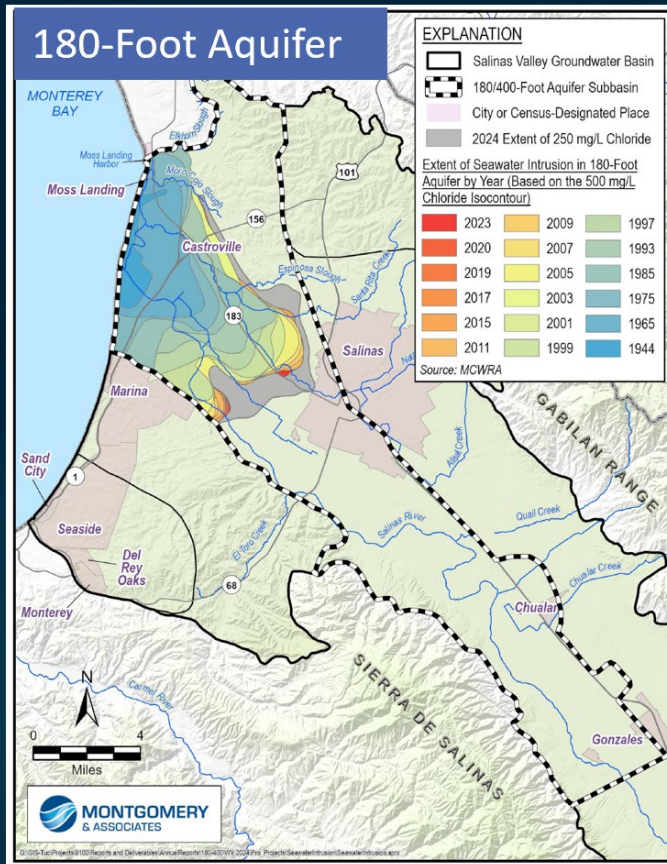


WY 2019 – WY 2024 Annual Reports



1. Seawater Intrusion

Seawater Intrusion – Advancement



Source: 180/400-Footer Aquifer Subbasin Water Year 2024 Annual Report

- ▶ 180-Footer Aquifer – SWI advanced during 2019, 2020, and 2023.
 - ▶ 400-Footer Aquifer – SWI advanced every single year since the GSP was implemented.
 - ▶ Mapped extent of SWI is based on the 500 mg/L chloride concentration iso-contour.
 - ▶ MT is defined as extent of the 500 mg/L chloride concentration iso-contour observed in 2017. Undesirable result (UR) is defined as intrusion beyond the 2017 extent.
 - ▶ SWI is due mostly to groundwater level (GWL) declines from increased GW extraction (2025 Periodic Evaluation, Appendix 3C).
 - ▶ Extent of 250 mg/L chloride iso-contour serves as an early warning of SWI – has reached western boundary of the City of Salinas in the 180-Footer Aquifer and is 990 ft away in the 400-Footer Aquifer.
- ▶ Aquifers in Subbasin: 180-Footer Aquifer, 400-Footer Aquifer, and Deep Aquifers.
 - ▶ Based on information in documents submitted by the SVBGSA, seawater intrusion (SWI) continues to advance in the 180-Footer and 400-Footer Aquifers. No SWI observed in the Deep Aquifers.



Seawater Intrusion – Undesirable Results & Impacts

	2019	2020	2021	2022	2023
180-Foot Aquifer	Intrusion	Intrusion	No new intrusion but beyond 2017	No new intrusion but beyond 2017	Intrusion
400-Foot Aquifer	Intrusion	Intrusion	Intrusion	Intrusion	Intrusion
Deep Aquifers	No intrusion	No intrusion	No intrusion	No intrusion	No intrusion
Subbasin Groundwater Level Undesirable Result	2019 Undesirable Result	2020 Undesirable Result	2021 Undesirable Result	2022 Undesirable Result	2023 Undesirable Result

Source: 180/400-Foot Aquifer Subbasin 2025 Periodic Evaluation

- ▶ URs have occurred every single year since GSP implementation
- ▶ Impacts on Beneficial Uses and Users
 - ▶ 180-Foot Aquifer: SWI has expanded beneath 1 domestic well and intruded an area where 2 ag wells are located.
 - ▶ 400-Foot Aquifer: SWI has extended to an area where 9 ag wells are located; 2 wells have been destroyed, 1 Castroville CSD well was taken offline due to high chloride levels.
- ▶ Impacts on other Sustainability Indicators
 - ▶ SWI and GWL MTs are used to calculate the MT for reduction of GW storage. Therefore, increases in SWI contribute to decreases in GW storage (2022 Amended GSP, Section 8.7.2.1, p. 297)
- ▶ First 5-year interim milestone: Not achieved

Seawater Intrusion – Additional Information

Given the following:

- Undesirable results for seawater intrusion have been occurring since GSP implementation
- Supply wells are being negatively impacted by the continued advancement of seawater intrusion
- Long-term declining groundwater elevations are continuing to contribute to seawater intrusion
- Increases in seawater intrusion impact the reduction of groundwater storage sustainability indicator
- First 5-year interim milestone has not been met
- PMAs to address seawater intrusion have not yet been implemented

- ❑ What actions are being taken?
- ❑ Is there a plan of action for supply wells that get impacted during GSP implementation, particularly those outside the service area of the Castroville Seawater Intrusion Projects (CSIP), to address associated impacts on beneficial uses and users?

2. Projects and Management Actions and Lack of Implementation

Projects and Management Actions & Implementation

- ▶ CSIP, initiated in 1998, has slowed the rate of SWI, but has not halted SWI altogether. Subbasin is also experiencing declining GW elevations and overdraft (2022 Amended GSP, Section 3.10, p. 93).
- ▶ Therefore, implementation of new/additional PMAs is necessary.
- ▶ However, no new/additional PMAs have been implemented.
- ▶ Previously planned schedule:
 - ▶ Initial GSP proposed a Water Charges Framework and Projects to be refined during the first 3 years of GSP implementation and to be in place by June 30, 2023.
 - ▶ Projects were to then be immediately implemented in a coordinated fashion across the entire Salinas Valley Groundwater Basin (2020 GSP, Section 10.9, p. 420).

Projects and Management Actions & Implementation

- ▶ The SVBGSA did not proceed with the Water Charges Framework; instead, a new management action – Demand Planning – was added. (2022 Amended Plan Section 9.4.1, pp. 345-346) .
- ▶ While some work is underway to improve, expand, or optimize projects that existed pre-SGMA (e.g., CSIP Optimization Project), no significant progress has been made moving forward with implementing the new PMAs.
- ▶ Status of proposed PMAs specific to the 180/400-Foot Aquifer Subbasin (Subbasin):
 - ▶ Mostly still conceptual/under feasibility study
 - ▶ Have no firm commitment of being implemented
 - ▶ Have no clear schedules of when PMAs will be fully in place (no initiation and completion dates provided in the PMA Module on the SGMA Portal).

Projects and Management Action & Implementation

- ▶ Main PMAs identified to address seawater intrusion:
 - Brackish Groundwater Restoration Project
 - Seasonal Reservoir Release with Aquifer Storage and Recharge (ASR)
 - Demand Planning Management Action

Project/ Management Action #	Project/ Management Action Name	Project/ Management Action Description	Project Benefits	Quantification of Project Benefits	Cost ⁹	Targeted Sustainability Indicator	Project Status	Expected Schedule
P5/P6	Brackish Groundwater Restoration Project (previously Seawater Intrusion Extraction Barrier/ Regional Municipal Supply Project)	Install a series of wells in the 180-Foot and 400-Foot Aquifers to extract brackish groundwater to form a hydraulic barrier that prevents seawater intrusion from advancing inland of the wells and build a regional brackish treatment plant to supply water to both agricultural and urban end users in this Subbasin and other subbasins	Prevention of seawater intrusion inland of wells, alternative water supply, less groundwater pumping, reduced risk of seawater intrusion	The total agricultural land use that falls within the seawater intrusion boundary is modeled as 27,835 acres by 2070 under the no project scenario. Approximately up to 149 wells fall between the no project alternative and the Brackish Groundwater Restoration Project chloride boundaries. The total usage of groundwater for these 149 wells is 30,077 AF/yr. The proposed project would protect the water quality of these wells. Volume of treated water produced for end users and injection. Small alternative – 28,008 AF/yr of treated water, Medium alternative – 46,858 AF/yr of treated water, Large alternative – 64,920 AF/yr	Feasibility Study Capital Cost Small Alternative - \$720,780,000; Unit Cost for 28,008 AF/yr treated: \$2,931/AF/yr Capital Cost Medium Alternative - \$ 1,013,690,000; Unit Cost for 46,858 AF/yr treated: \$2,365/AF/yr Capital Cost Large Alternative - \$1,482,690,000; Unit Cost for 64,920 AF/yr treated: \$2,669/AF/yr	Seawater intrusion, Groundwater Levels, Storage, Subsidence,	Phase 1 feasibility study initiated in Summer 2023, to be completed first quarter 2025	If selected, project planning through 2025 - 2028, pilot/demonstration phase 2025 - 2029, environmental review, permitting and construction 2027-2034
P7	Seasonal Release with ASR	Release flows from reservoirs during the winter/spring, for groundwater recharge and then diversion at the SRDF. Diverted water will be treated and then injected into the 180-Foot and 400-Foot Aquifers for seasonal storage, and then extracted for delivery to CSIP during the peak irrigation season and/or delivered for direct municipal use.	Seasonal storage of winter/spring flows in the northern Salinas Valley; reduced coastal pumping during peak irrigation season	14,600 AF/yr injected; 6,800 AF/yr of additional groundwater storage in the 180/400 Subbasin (Feasibility Study modeling to update this estimated of benefits)	Preliminary Feasibility Study – To be updated as part of feasibility analysis	Groundwater Levels, Storage, Subsidence, Seawater intrusion, ISW	Preliminary feasibility study to be completed January 2025	If selected, additional feasibility analysis 2025 – 2026
MA – MANAGEMENT ACTIONS								
MA1	Demand Planning	Proactively determines how extraction should be controlled and planned for	Decreases extraction if needed	Range of potential benefits	Approximately \$415,000 for program development, ongoing/annual and future costs being evaluated in planning process	Groundwater Levels, Storage, Subsidence, Seawater intrusion, ISW	Underway. Completed Situation Assessment in 2023. Held Valley-wide workshops held in spring 2024. 180/400 Committee dialogue was initiated fall 2024. Legal and economic analyses underway.	2025 – Develop recommendations, including economic and legal considerations, and create a work plan for a demand management program. 2026 forward - program implementation.

Projects and Management Action & Implementation

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- ▶ Construction of the Brackish GW Restoration Project estimated to be completed in 2034, only six years before the 2040 deadline.
 - ▶ In the interim, are there are other projects or management actions that will be implemented sooner to help address seawater intrusion?
- ▶ Cost for the Brackish GW Restoration Project ranges from approximately \$720M to \$1.5B.
 - ▶ Are there contingency projects and/or management actions that can be implemented to address SWI if funding cannot be secured?
- ▶ Demand Planning – no specifics provided in the Amended Plan (Section 9.4.1, pp. 345-349).
 - ▶ Unclear what the triggers will be
 - ▶ Unclear what actions it will entail
 - ▶ Quantified benefits expected not provided
- ▶ Brackish GW Restoration Project and Seasonal Release with ASR – not yet selected for implementation based on the “if selected” status shown in Table 3-2 of the 2025 Periodic Evaluation.

Projects and Management Action & Implementation

- ▶ All-encompassing project selection process is needed to determine projects for moving forward across all Salinas Valley subbasins planned to be completed by January 2027, concurrently with the 2027 periodic evaluations for the other subbasins (2025 Periodic Evaluation, Section 3.1, p. 83).
 - ▶ Further delays PMA implementation in the 180/400-Foot Aquifer Subbasin.
 - ▶ Is a change from previous plan to start implementing projects by 2023 (approx. 1 year after GSPs for the other subbasins were completed).
 - ▶ Unlike the other subbasins, the 180/400-Foot Aquifer Subbasin is a COD basin, with an earlier deadline to meet sustainability.
 - ▶ Except for the Monterey Subbasin, other subbasins are not experiencing SWI.
 - ▶ Therefore, implementation of PMAs specific to the 180/400-Foot Aquifer Subbasin should take precedence.
- ▶ Considering URs and impacts on supply wells occurring due to SWI, and missed interim milestone, delayed PMA implementation raises question of whether the 180/400-Foot Aquifer Subbasin can reach sustainability by 2040.
- ▶ Without definitive PMAs that will be implemented, complete schedules of when PMAs will be fully in place, and timeline of accrual of expected benefits from the PMAs, staff are unable to fully assess PMAs and whether the sustainability goal for the basin will be achieved by 2040 deadline

Projects and Management Actions & Implementation – Additional Information

- ❑ Considering a late completion date for construction of the Brackish Groundwater Restoration Project, are there any other PMAs that will be implemented sooner to help address seawater intrusion in the interim?
- ❑ If the Brackish Groundwater Restoration Project and/or Seasonal Release with ASR Project do not get selected for implementation, are there contingency project(s) and/or management action(s) that will be implemented to stop and mitigate seawater intrusion?
- ❑ Specify what the Demand Planning management action will entail, including triggers, and provide the estimated quantified benefits expected.
- ❑ To be able to assess PMAs and whether they will achieve the sustainability goal for the Subbasin, staff need to know which projects for addressing SWI will be moved forward for implementation, including their initiation and completion dates, and timelines for accrual of expected benefits in relation to the 2040 deadline for achieving sustainability.
- ❑ Update the PMA module on the SGMA Portal with any new/additional information that has become available since the 2022 Amended GSP, 2025 Periodic Evaluation, and WY 2024 Annual Report were submitted to the Department.

3. Reduction of Groundwater Storage – Revised Calculations

Reduction of Groundwater Storage Revised Calculations

Based on the 2025 Periodic Evaluation

Table 2-11. Annual Summary of Groundwater Storage Undesirable Results

	2019	2020	2021	2022	2023
Groundwater in storage needed to reach the Measurable Objective (acre-feet)	642,000	648,000	666,000	678,000	621,000
Subbasin Groundwater Level Undesirable Result	Undesirable Result	Undesirable Result	Undesirable Result	Undesirable Result	No Undesirable Result

Based on the Water Year 2024 Annual Report

Table 4-8. Updated Annual Data Against Reduction in Storage SMC

	2019	2020	2021	2022	2023
Gain in storage needed to reach Measurable Objective (AF)	562,000	577,000	604,000	633,000	597,000
Subbasin Groundwater Level Undesirable Result	No undesirable result	No undesirable result	No undesirable result	Undesirable result	No undesirable result

- ▶ Annual Reports for WY 2019 through WY 2023 and the 2025 Periodic Evaluation show that URs for reduction of GW storage occurred in WY 2019 through WY 2022.
- ▶ Annual Report for WY 2024 (Section 4.2.2.3, pp. 102-103) states that a mistake was found in the calculation used to assess the SMC for reduction of GW storage for previous years and provides updated calculations, which show URs for reduction of GW storage over the past 5 years only occurred in WY 2022.
- ▶ The mistake and how it was corrected are not explained.
- ▶ Additional information is needed for clarity.

Reduction of Groundwater Storage Revised Calculations – Additional Information

- ❑ Provide additional information to explain the mistake was found in the calculation used to assess sustainable management criteria for reduction of groundwater storage and how the mistake was corrected.

4. Degraded Water Quality

Degraded Water Quality – Small Water Systems

- ▶ Amended GSP, Section 3.4.3.2, p. 81: GW quality in the Subbasin is monitored under several different programs and overseen by different agencies, including the following:
 - ▶ Division of Drinking Water (DDW), under the State Water resources Control Board – municipal and other public water system wells;
 - ▶ Irrigated Lands Regulatory Program (ILRP), under the Central Coast Regional Water Quality Control Board (CCRWQCB) – on-farm domestic wells and agricultural wells; and
 - ▶ Monterey County Department of Public Health – local small or state small water system wells.
- ▶ Initial GSP – established SMC for evaluating degraded water quality at all the well types identified above and included plans to fill data gaps for the monitoring network for small water systems.
- ▶ 2022 Amended GSP – small water systems removed from evaluation of degraded water quality; monitoring network includes DDW public supply wells, ILRP on-farm domestic wells, and ILRP agricultural wells. Local small or state small water system wells have been excluded.
- ▶ Provide rationale for excluding small water systems from the evaluation of degraded water quality in the Subbasin.

Degraded Water Quality – MT Exceedances

Table 2-13. Water Quality Constituent of Concern Exceedances for 2017 and 2023

Constituent of Concern (COC)	Existing Exceedances of Regulatory Standard in 2017 (Minimum Threshold/Measurable Objective)	Exceedances of Regulatory Standard in 2023	Number of Wells in 2023 with Exceedances above 2017 (negative if fewer than 2017 exceedances)
DDW Wells			
1,2,3-Trichloropropane	0	2	2
Aluminum	1	0	-1
Arsenic	2	1	-1
Chloride	3	5	2
Chromium	1	0	-1
Chromium, Hexavalent (Cr6)	16	0	-16
Di(2-ethylhexyl) phthalate	2	2	0
Foaming Agents (MBAS)	7	8	1
Gross Alpha radioactivity	4	2	-2
Iron	8	11	3
Manganese	3	10	7
Methyl-tert-butyl ether (MTBE)	0	3	3
Nitrate (as nitrogen)	9	11	2
Selenium	1	0	-1
Specific Conductance	6	7	1
Sulfate	1	0	-1
Total Dissolved Solids	6	9	3
ILRP On-Farm Domestic Wells			
Chloride	17	14	-3
Iron	9	10	1
Manganese	3	3	0
Nitrate (as nitrogen)	64	68	4
Nitrate + Nitrite (sum as nitrogen)	12	50	38
Nitrite	2	2	0
Specific Conductance	59	92	33
Sulfate	4	4	0
Total Dissolved Solids	64	72	8
ILRP Irrigation Wells			
Chloride	26	28	2
Iron	2	2	0
Manganese	2	2	0

- ▶ Several MT exceedances over the past 5 years.
- ▶ The MT exceedances have not been considered as URs based on how the UR is defined in the GSP.
 - ▶ URs Definition: Future or new MT exceedances are caused by a direct result of GSA groundwater management action(s), including projects or management actions and regulation of groundwater extraction.
- ▶ Because the SVBGSA has not implemented PMAs, the MT exceedances are not determined to be due to GSA action. Therefore, currently, the GW quality exceedances are not considered an UR.
 - ▶ The SVBGSA intends to revise the definition of URs in the next GSP amendment (planned for 2027), to include MT exceedances caused by GW extraction that modifies pre-2015 GW conditions, regardless of GSA action or inaction.
 - ▶ The SVBGSA is in the process of assessing the relationship between GW quality and extraction and plans to include the analysis in the next Periodic Evaluation (planned for 2027).

Degraded Water Quality – MT Exceedances

- ▶ The SVBGSA is also working to develop a process through which MT exceedances will be reviewed and is coordinating with other entities through the Water Quality Coordination Group to share and discuss the MT exceedances.
 - ▶ The Water Quality Coordination Group includes the CCRWQCB, local agencies and organizations, water providers, domestic well owners, technical experts, and other interested parties.
 - ▶ The Water Quality Coordination Group meets annually to review the status of water quality data and discuss any action needed to address water quality degradation.
- ▶ What has been the outcome from the discussions and coordination efforts with the Water Quality Coordination Group regarding the MT exceedances occurring in the Subbasin and from the assessment of whether groundwater management (or lack thereof) is exacerbating groundwater quality conditions?

Degraded Water Quality – Additional Information

- ❑ Provide the rationale for removing small water systems from the evaluation of degraded water quality in the Subbasin.
- ❑ What has been the outcome from the discussions and coordination efforts with the Water Quality Coordination Group regarding the MT exceedances occurring in the Subbasin and the assessment of whether groundwater management (or lack thereof) is exacerbating groundwater quality conditions?

Summary of Additional Information Requested

Summary of Additional Information

1. Seawater Intrusion Advancement:

- a. What actions are being taken given that undesirable results for seawater intrusion have been occurring since GSP implementation, supply wells are being impacted, declining groundwater levels continue to contribute to seawater intrusion, the first interim milestone has not been attained, and PMAs to address seawater intrusion have not been implemented?
- b. Is there a plan of action for when supply wells (particularly those outside the CSIP service area) get impacted during GSP implementation to address associated impacts on beneficial uses and users?

2. Projects and Management Actions:

- a. Because the Brackish Groundwater Restoration Project will take a long time to be constructed and fully be in place, are there other PMAs that will be implemented in the interim to help address seawater intrusion?
- b. If the Brackish Groundwater Restoration Project does not get selected for implementation, what contingency project(s) and/or management action(s) will be implemented to halt and mitigate seawater intrusion?
- c. Provide specifics of what the Demand Planning management action will entail, including triggers and the quantified benefits expected.
- d. To fully assess PMAs and whether they will achieve the sustainability goal for the Subbasin, staff need to know which projects for addressing SWI will be moved forward for implementation, including their initiation and completion dates, and timelines for accrual of expected benefits in relation to the 2040 deadline for achieving sustainability.
- e. Update the PMA module on the SGMA Portal with any new/additional information that has become available.

3. Explain the mistake found in the calculations used to assess SMC for reduction of groundwater storage and how it was corrected.

4. Degraded Water Quality:

- a. Provide rationale for excluding small water systems from the evaluation of degraded water quality in the Subbasin.
- b. Provide the outcome of the Water Quality Coordination Group meetings held thus far to discuss MT exceedances and assess whether groundwater management and extraction in the Subbasin is resulting in degraded water quality in the Subbasin.

Next Steps

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- ▶ Method to address Additional Information
 - ▶ Letter or Memorandum addressing the questions DWR has
 - ▶ Deliverable to be emailed to aimee.phiri@water.ca.gov with CC monica.salais@water.ca.gov
 - ▶ Include evidence that GSA is aware and approves the submittal the deliverable to DWR
- ▶ Schedule
 - ▶ Check-In Meeting by end of January
 - ▶ Response by April 30
- ▶ Contact with Questions
 - ▶ aimee.phiri@water.ca.gov, CC monica.salais@water.ca.gov

Annual Report Approaches

1. Highlight the data that is already collected. SVBGSA already submits spring groundwater elevations for the 95 RMS wells for which there are spring measurements (out of 217 RMS wells) to the SGMA monitoring portal; however, they have not been included in annual reports to date. Going forward, those spring groundwater elevations could be included in Annual Reports. This would not be for all RMS wells. If desired, we could also include a comparison/analysis of a subset of wells in the monthly monitoring program to the November/December groundwater elevations to show how groundwater elevations in the spring compare to the other times of the year. This would have no additional cost.
2. Add spring monitoring for a few more wells, but not all RMS wells. This option would be to add only wells down paved roads or adding wells needed to enable development of spring seasonal high contours. This would help meet DWR halfway but would not be adding all 122 measurements. We could also evaluate whether it would make sense to shift some RMS wells to nearby wells that are already monitored monthly or shift which wells are monitored monthly to more RMS wells.
3. Add spring measurements for all RMS wells (DWR request). This would require adding 122 spring measurements, which would cost approximately \$62,000/year at current rates.