

# MONTEREY COUNTY

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April 26, 2022

### VIA ELECTRONIC MAIL

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### **Long-Term Effectiveness Reporting and continued program activities, Water Quality Certification Number 32716WQ02 for 2016-2025 Salinas River Stream Maintenance Program, Monterey County**

Dear Ms. Kukol and Mr. Cassady,

On August 31, 2016, the Monterey County Water Resources Agency (MCWRA) obtained a technically conditioned Water Quality Certification (Certification) for the 2016-2025 Salinas River Stream Maintenance Program (Project). The Certification for the Project was necessary as the MCWRA and its partners proposed to conduct stream maintenance activities in up to 123 secondary channel areas, two selective treatment areas, and three tributary maintenance areas. The Certification remains in effect until November 30, 2025 provided that compensatory mitigation implementation, monitoring, and reporting requirements and all conditions are followed by MCWRA, the Permittee. In support of the Certification, the Central Coast Regional Water Quality Control Board (Central Coast Water Board) has asked to assess the implementation and effectiveness of the SMP after five years, and can propose modifications for the second five-year term, if necessary.

The MCWRA completed the first Effectiveness Report for the Project and provided it to the Central Coast Water Board on June 30, 2021. The Effectiveness Report includes the analyses, assessments, and other information identified in Special Condition 1.7 and is consistent with the approved Long-Term Effectiveness Assessment Plan dated May 2019. On July 6, 2021, Mr. Cassady, Environmental Scientist, thanked the MCWRA for sending the comprehensive Effectiveness Report and it was noted that despite the limitations

of not having data from 5- or 10-year storm events, the report contains useful information and indicates the MCWRA was prepared to collect and analyze data once such events inevitably occur.

Additional comments were provided by the Central Coast Water Board Which revolved around the amount of work being performed in the first five years. MCWRA has outlined the response to those items below.

1. Do you by chance have a map that shows the treated and untreated MA's?

Please see the map provided as an enclosure.

2. Is the general reason for this because most of the areas just didn't need treatment; is it because of landowner indifference or resistance; is it because of the costs involved to do the work; were a lot of areas inaccessible; were the original estimates just not realistic; or is it because of something else?

The Program has continued to gain support over time, but the participation is still relatively low. This is due to a few factors such as providing the necessary education and outreach to bring the landowners and participants into the Program. This is a voluntary program that is primarily funded by the landowners and participants doing the work. There was some initial discomfort and adaptation to a new program that reflected substantial changes from the previous Channel Maintenance Program approach, methods, timing, and legal agreements. The increased permitting and administrative costs associated with the updated Program have also been a factor. There have been significant efforts to bring in grant money to help increase participation in the Program. This hesitancy is abating as landowners see the project benefits (actual flood reduction in places, etc.) and otherwise adapt to the new Program, which was evidenced in particular by a valley-wide letter-writing campaign of over 100 landowners in support of the SMP's inclusion as a project in the draft Groundwater Sustainability Plans in the Salinas Valley. The long list of signatories included many former skeptics who are just now signing up with the Program to develop new secondary channels on their properties.

The inaccessibility of areas has been a minor factor due to some adjacent landowners not participating in the program or natural features that reduce the effectiveness of a secondary channel. In response to these issues, staff has made adjustments to some channel alignments once on the ground (and within permit terms/procedures) to ensure effectiveness and limit unnecessary work.

3. Were the treated areas based solely on landowner willingness or would it be fair to say higher priority areas were chosen for treatment?

The majority of treated areas are based on landowner willingness since the program is a volunteer based. With that said, treated areas tend to take place in higher priority areas—those landowners have a more compelling incentive (flood risk/experience) to get the work done.

4. How does this affect the modeling and ultimately the plan's effectiveness at addressing flooding? In other words, will only 18 percent of the flood control benefit be realized? Did all of the modeling assume full participation?

The Project EIR, dated June 2014, anticipated that river conditions and participation may change and a flexible process would be implemented based on annual work plans. The design and implementation of the SMP was developed to include 1) the identification of willing participants and potential River Maintenance Units (RMUs), and 2) site-specific resource surveys and 2D modeling that allowed for early identification of flood benefit and opportunities for environmental enhancement and/or protection.

The Project EIR included the Salinas River Stream Maintenance Program Flood Study. This report evaluated the effects of proposed maintenance activities on channel flood capacity along 100 miles of river, through a hydraulic model of the Salinas River. The model simulated existing flood capacity and determined changes in flood capacity with proposed stream maintenance activities, during different flow conditions. The model is a reasonable predictor of the general impacts of the SMP on the Salinas River flood flow stages (2- and 10- year flows). The model input does consider subsections of each channel cross section. The model did not consider varying amounts of participation in vegetation management. However, based on experience and modelers expertise, vegetation maintenance at individual MAs does have the potential to reduce flooding in a localized manner.

To maximize the benefits of flood reduction throughout the system, and other benefits of the Project, the more river miles where vegetation maintenance is performed the more beneficial to the Salinas River and reducing flooding.

5. Could greater participation achieve more ecological benefit through Arundo removal or otherwise? Do non-treated areas generally contain more native diversity that would trigger more mitigation?

With respect to the first part of this question, establishing secondary channels leads to a more braided river system that results in slower flows in the main channel and the opportunity for creation of backwater areas and wetlands. In that regard, greater participation would result in more ecological benefit. Arundo removal is occurring throughout the watershed under a separate program, in addition to the SMP. That program is also administered by the Resource Conservation District of Monterey County (RCDMC) and has received regular grants to fully fund annual work. Therefore, the removal of non-native invasive species will continue and provide numerous ecological benefits in addition to this Program.

There is general vegetation mapping for most of the river and the vegetation types are described at an RMU-level. It does not appear the abundance of native vegetation or habitat complexity play a role in inhibiting participation. The program is flexible enough that participants who encounter sensitive habitat within their proposed work area are able to modify alignments, create

no-work buffers, or otherwise modify their planned maintenance activities to minimize impact and/or associated mitigation requirements. There have been cases where the avoidance measures create areas where effective secondary channels cannot be constructed and therefore they are shortened or not pursued. The ability to relocate those MAs to another part of the RMU would help address those issues.

6. I assume the topographic surveys were 10 percent of the treated MA's; so if more MA's are treated, then more topographic surveys would be required, correct?

Yes, to be consistent with 401 and 404 permits we would need to conduct more surveys as more channels are added to the program. Currently, there is at least one MA identified for topographic surveys per RMU that has been treated.

7. Table 5 did not include any recommendations aimed at increasing participation. Is 18 percent satisfactory or is this something that needs to be looked at, and should landowner participation be added to the Long-Term Effectiveness Assessment Plan?

The 18% participation to date in effect reflects the 'early adopters' among the Salinas River landowner population. Drawing in the next level of participation is a challenge that has been a concern for us during the first five years of the program that we are addressing in the following ways: 1) more concerted outreach by the RCDMC for new landowner recruitment; 2) raising grant funds to ease the sticker-shock for creation of new work areas; 3) engaging the Salinas Valley Basin Groundwater Management Agency to incorporate a comprehensive Salinas River Maintenance and Arundo Control Program (for established water conservation/enhanced percolation benefits) in its various relevant sub-basin Groundwater Sustainability Plans to enlist local assessment funding to offset administrative and implementation costs; and 4) otherwise identifying opportunities to reduce costs through administrative streamlining and operational efficiencies with the program administration coming under one 'shop' (the RCDMC), as opposed to three different organizations (MCWRA, RMU Association, and RCDMC). While the MCWRA and RMU Association remain engaged as critical partners, administration is becoming more centralized, with the additional benefit of reduced complexity for new landowners interested in the program.

Per item one above, the RCDMC in partnership with RMU Association received grant funding via DWR that will fund all administrative costs for 10 new channels. Administrative costs include biological assessments, biomonitoring, program management, vegetation mapping, permit oversight, work plan development and permit fees. These grant funds may be applied to the next two fiscal years (22-23 and 23-24). Offsetting administrative costs will hopefully recruit new program participants. For this upcoming work season there are eight new channels slated for maintenance.

Since this is a voluntary Program, and benefits are realized on a local level, the participation does not seem appropriate to be added to the Long-Term Effectiveness Assessment Plan at this time.

April 26, 2022

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The MCWRA staff would like to thank the Central Coast Water Board for its consideration of the Effectiveness Report and for the work being done to manage the resources in the Salinas River Watershed. Please direct any questions regarding this matter to Jennifer Bodensteiner, Associate Hydrologist - Operations, at (831) 755-4860 or [bodensteinerjm@co.monterey.ca.us](mailto:bodensteinerjm@co.monterey.ca.us).

Sincerely,





Brent Buche  
General Manager

Enclosure

Cc: Shaunna Murray, Senior Water Resources Engineer – Operations, [MurraySL@co.monterey.ca.us](mailto:MurraySL@co.monterey.ca.us)  
Jennifer Bodensteiner, Associate Hydrologist, [BodensteinerJM@co.monterey.ca.us](mailto:BodensteinerJM@co.monterey.ca.us)

# Treated Maintenance Areas

-  Maintenance Areas (Treated)
-  Maintenance Areas (Not Treated)

Page: 1

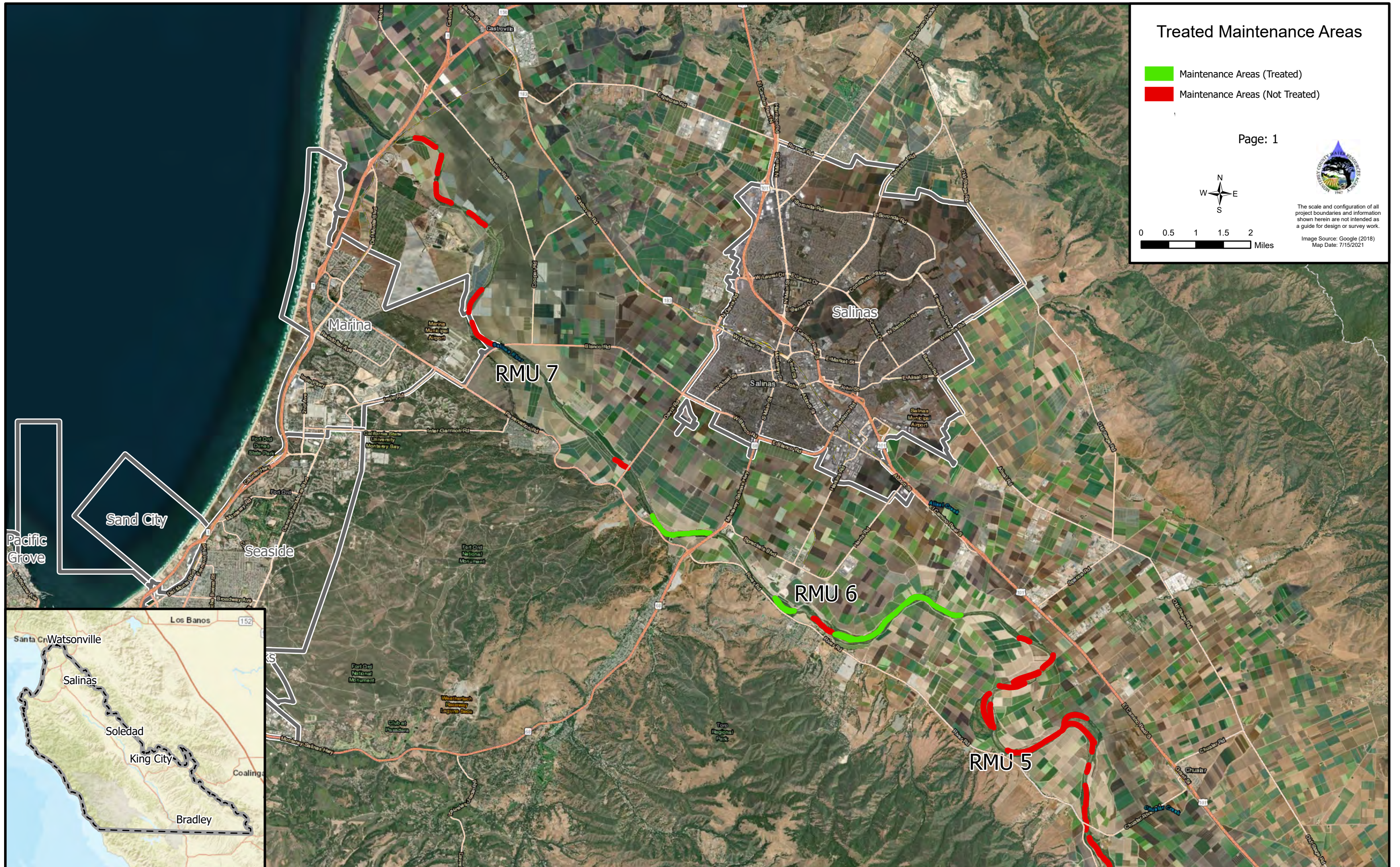


0 0.5 1 1.5 2 Miles



The scale and configuration of all project boundaries and information shown herein are not intended as a guide for design or survey work.

Image Source: Google (2018)  
Map Date: 7/15/2021



# Treated Maintenance Areas

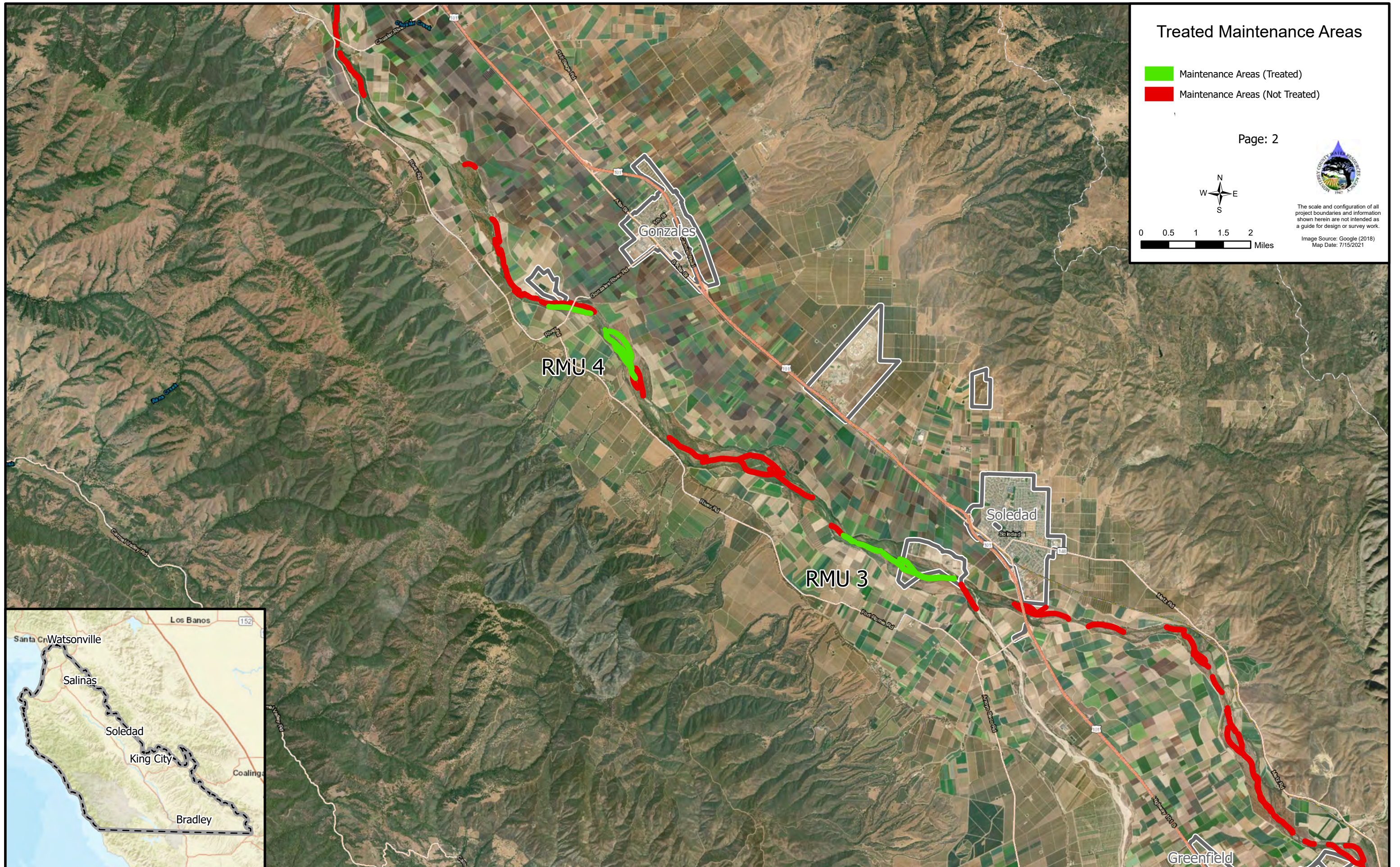
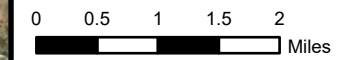
- █ Maintenance Areas (Treated)
- █ Maintenance Areas (Not Treated)

Page: 2





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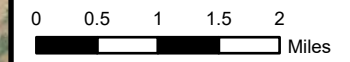
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# Treated Maintenance Areas

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Page: 3





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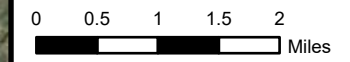




# Treated Maintenance Areas

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Page: 4



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RMU 1

