
Central Coast Regional Water Quality Control Board

January 26, 2016

Via Electronic Mail Only

Mr. Parry Klassen
Executive Director
Central Coast Groundwater Coalition
P.O. Box 828
Salinas, CA 93902
pklassen@unwiredbb.com

Dear Mr. Klassen,

IRRIGATED LANDS REGULATORY PROGRAM – APPROVAL OF THE CENTRAL COAST GROUNDWATER COALITION GROUNDWATER CHARACTERIZATION REPORTS AND COMPLETION OF WORKPLAN

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) received addendums to the “*Northern Counties Groundwater Characterization Report: Salinas Valley, Pajaro Valley and Gilroy-Hollister Valley*” and “*Southern Counties Groundwater Quality Characterization Report*” dated December 16, 2015 (Characterization Report Addendums). The Characterization Report Addendums were prepared by Luhdorff & Scalmanini Consulting Engineers (LSCE) and submitted on behalf of the Central Coast Groundwater Coalition (CCGC). In a letter dated June 25, 2015, the Central Coast Water Board required the CCGC to prepare the Addendums as a condition for approving the Northern and Southern Counties Characterization Reports as complete and final, including monitoring and reporting of an additional 116 domestic drinking water wells not previously identified on CCGC member parcels (92 wells in the northern counties and 24 wells in the southern counties). Based on our review, we find that CCGC has completed the groundwater monitoring and reporting required by the June 25, 2015 letter. Therefore, we hereby accept the “*Final Northern Counties Groundwater Characterization Report: Salinas Valley, Pajaro Valley and Gilroy-Hollister Valley*” and “*Southern Counties Groundwater Quality Characterization Report*, including the respective Characterization Report Addendums as complete and final.

Results and Interpretation of Additional Data

In the letter dated June 25, 2015, the Central Coast Water Board also stated that if the inclusion of data from additional domestic drinking water wells resulted in a different interpretation than that described in the Characterization Reports and associated nitrate contour maps, the Central Coast Water Board may require CCGC to revise those submittals. The Characterization Report Addendums submitted by CCGC compared the nitrate data from the additional wells to the nitrate contour maps presented in the original Characterization reports and did find that the addition of the new domestic well data did result in a different interpretation. CCGC reported that the data from the additional wells sampled identified new areas on the contour maps where nitrate results exceed the drinking water standard. These areas were previously identified on

the contour maps as below the drinking water standard. This finding is consistent with staff's previous determination described in our February 20, 2015 letter that contour maps alone are not sufficient for providing reliable information to the public, in lieu of actual groundwater data. Central Coast Water Board staff recognizes that the continued addition of data will also likely result in necessary updates to any interpretation, including contour maps.

As stated in the February 20, 2015 letter to CCGC, due to the significant impacts to groundwater that serves as a source of drinking water, the Central Coast Water Board must prioritize safe drinking water and maximize the public's access to information and data regarding nitrate impacts to groundwater. The Central Coast Water Board will display CCGC data for the public as individual wells on Water Board's GeoTracker GAMA¹ groundwater data management system on March 15, 2016, as planned. To avoid additional costs to CCGC and because CCGC data will be displayed on GeoTracker GAMA in the near future, staff will not require CCGC to revise the Characterization Reports or associated contour maps.

CCGC Workplan Completion

Since July 2013, CCGC has worked closely with Central Coast Water Board staff to complete all tasks and deliverables identified in the CCGC Workplans, as required. At this time, we find that CCGC has completed the monitoring and reporting as required in Monitoring and Reporting Program R3-2012-0011-01, -02, and -03 (MRPs) and as described in the CCGC Workplans approved by the Executive Officer on July 11, 2013 and December 17, 2013 (northern counties), and December 18, 2013 (southern counties). In summary, in the last four years, CCGC completed the tasks identified below and submitted the following workplan deliverables:

- CCGC membership and organizational information.
- GIS spatial map data for the CCGC's northern and southern county boundaries.
- Quality Assurance Project Plans and Sampling and Analysis Plans.
- Lists of wells and sampling schedules for the Salinas Valley/Lockwood Valley, Pajaro Valley, Gilroy Hollister, and southern counties (San Luis Obispo, Santa Barbara, and Ventura counties).
- Completion of all groundwater sampling for Salinas Valley/Lockwood Valley, Pajaro Valley, Gilroy Hollister, and southern counties (San Luis Obispo, Santa Barbara, and Ventura counties); CCGC sampled approximately 563 wells (27 irrigation and 536 domestic drinking water wells) in the northern counties and approximately 635 wells (411 irrigation and 224 domestic drinking water wells) in the southern counties.
- Upload of all CCGC groundwater nitrate and general chemistry monitoring data to GeoTracker. CCGC has not submitted any ancillary data, such as isotope or age-dating-related monitoring data and has indicated it will not be because the data is not required under the MRP².
- Technical memorandums summarizing nitrate results in domestic supply wells located in the Salinas Valley/Lockwood Valley, Pajaro Valley, and Gilroy-Hollister.

¹ <https://geotracker.waterboards.ca.gov/gama/>

² In letters dated March 20, 2015 and May 18, 2015, the Central Coast Water Board requested that CCGC submit ancillary data collected to implement the approved CCGC Workplan (e.g., stable isotopes, pharmaceuticals, noble gases, age-dating). In a response letter dated May 29, 2015, CCGC stated they would not submit these data because they were not required in the MRP.

- Groundwater Characterization Report for the Northern Counties
- Groundwater Characterization Report for the Southern Counties
- Completion of additional domestic well sampling (116 domestic drinking water wells) and submittal of Addendums to the Northern and Southern Groundwater Characterization Reports, described in the section above.

At this time, CCGC continues to conduct cooperative groundwater monitoring and reporting for any newly enrolled CCGC member. In addition, CCGC continues to provide groundwater monitoring and reporting services for some growers who must comply with individual groundwater monitoring and reporting requirements. In these cases, CCGC must conduct groundwater monitoring and reporting, consistent with the approved CCGC workplans.

Future Updates to Groundwater Monitoring and Reporting Requirements

As we have discussed with CCGC, at this time Central Coast Water Board staff is reviewing groundwater data submitted in compliance with the Agricultural Order and MRPs. Based on this review, staff will consider potential updates to the existing groundwater monitoring requirements in the MRPs. In the case that staff recommends updates to the MRPs to the Executive Officer, staff will meet with CCGC to discuss how CCGC will continue to provide groundwater monitoring and reporting services to growers in the Central Coast Region, including the potential need to revise the CCGC Workplans to address any updates to the MRPs.

We appreciate that CCGC has completed the work to implement the CCGC Workplan on behalf of its members and has submitted groundwater data and deliverables of value to the Central Coast Water Board, the agricultural community, and the public. If you have any question concerning this letter, please contact Hector Hernandez at (805) 542-4641 or via e-mail at hector.hernandez@waterboards.ca.gov, or Angela Schroeter at (805) 542-4644 or via e-mail at angela.schroeter@waterboards.ca.gov.

Sincerely,

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Interim Executive Officer

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