
Central Valley Regional Water Quality Control Board

8 August 2014

Parry Klassen, Executive Director
East San Joaquin Water Quality Coalition
120 L Street
Modesto, CA 95354

REQUEST FOR EXTENSION TO SUBMITTAL DATE FOR EAST SAN JOAQUIN WATER QUALITY COALITION'S REVISED GROUNDWATER QUALITY ASSESSMENT REPORT

Thank you for your 4 August 2014 letter requesting a 90-day extension to the 11 August 2014 submittal date for the East San Joaquin Water Quality Coalition's (ESJWQC's) Revised Groundwater Quality Assessment Report (GAR). The ESJWQC is requesting the extension to allow enough time to make the requested revisions to the GAR. The Central Valley Water Board recently clarified the requirements outlined in the 4 June 2014 conditional approval letter in a meeting with the ESJWQC and other coalitions.

The extension will allow the ESJWQC's contractor the time needed to complete analyses and redraw the high vulnerability areas within the ESJWQC region and more fully develop the strategy for designating the Groundwater Quality Management Plan (GQMP) high priority locations within the high vulnerability areas. Based on Central Valley Water Board staff's review of the letter, the request is reasonable and is, hereby, granted. The new submittal date for the revised GAR is **10 November 2014**. This extension will also extend the submittal date for the ESJWQC's Comprehensive Groundwater Quality Management Plan until 60 days after the approval of the revised GAR and acceptance of the proposed high vulnerability and high priority areas.

Please note that all other compliance dates and conditions as specified in the 4 June 2014 conditional approval and listed in the attached table still apply. Should you have any questions or comments regarding this letter, please contact Joe Karkoski at Joe.Karkoski@waterboards.ca.gov or by phone at 916-464-4668.

Original Signed By

PAMELA C. CREEDON
Executive Officer

Attachment: Table 1 - Compliance Dates in 4 June 2014 Conditional Approval of East San Joaquin Water Quality Coalition's Groundwater Quality Assessment Report

Table 1
Compliance Dates In
4 June 2014 Conditional Approval of
East San Joaquin Water Quality Coalition's
Groundwater Quality Assessment Report

Due Date*	Requirements
+ 60 days**	Comprehensive Groundwater Quality Management Plan (24 January 2014 letter issued by the Executive Officer)
23 September 2014	Identification of the technical experts who will prepare and implement the work plans for the Management Practices Evaluation Program Group (18 March 2014)
4 June 2015	Groundwater Quality Trend Monitoring Work Plan (VIII.D.3) and Groundwater Quality Assurance Project Plan (QAPP) for Trend Monitoring (Attach. B. IX)
4 June 2016	Management Practices Evaluation Program (MPEP) Group Work Plan (VIII.D2.a) and Groundwater QAPP for MPEP (Attach. B IX)
4 June 2019	Review and confirm or modify vulnerability designations (Attach. B IV.A.4) And GAR update

* Based on the effective dates following the approval of the revised GAR.

** Following the final approval of the proposed vulnerability areas and prioritization.



August 4, 2014

Ms. Pamela Creedon, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC) is requesting a 90 day extension from August 11, 2014 for the completion of the Groundwater Quality Assessment Report (GAR) as specified in the Conditional Approval of East San Joaquin Water Quality Coalition's Groundwater Quality Assessment Report dated June 4, 2014. The extension is being requested because the ESJWQC was unable to initiate revisions to the GAR until after the July 23 meeting between the agricultural coalitions and the Regional Board management to clarify the requirements outlined in the approval letter.

The request will allow the ESJWQC's contractors the time needed to complete the analyses and redraw the high vulnerability areas within the ESJWQC region. The extension will also allow the contractors to more fully develop the strategy for designating the Groundwater Quality Management Plan (GQMP) high priority locations within the high vulnerability areas.

This re-designation involves an ongoing process to obtain exact well locations for CDPH wells for Disadvantaged Communities (DACs) located in the ESJWQC region. DACs will be identified from US Census Bureau data for Census Designated Places in accordance with the definition in California Public Resources Code Section 75005(g) for disadvantaged and severely disadvantaged communities.

Additionally, the structure of the GQMP will prioritize as "Priority 1" the high vulnerability areas where the highest acreage crops in the ESJWQC area occur. Mapping will indicate the location of the DACs in those areas.

We are requesting a 90-day extension to perform some additional analyses that will allow us to determine how to best address the Board's comments and also identify the prioritization method that accomplishes the vision for the GQMP. The ESJWQC recently received updated crop location data from member Farm Evaluation Surveys and is in the process of comparing this information to publically available land use maps. This process is expected to take several weeks but is critical for the designation of high priority areas in the Coalition region.

Finally, the prioritization process will assist in determining future trend groundwater monitoring site locations and subsequent reporting for the Coalition. Careful development of the process is critical to developing a defensible and cost effective groundwater monitoring program.



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All of the reports and information requirements triggered by the conditional approval of the GAR (Identification of technical experts implementing the Management Practices Evaluation Program (MPEP) Workplan, Groundwater Quality Trend Monitoring Workplan, Groundwater QAPP for the Trend Monitoring program, MPEP Group Workplan, and the Groundwater QAPP for the MPEP) will be submitted on the dates specified in the Conditional Approval letter of June 4, 2014. As specified in Order R5-2012-0116-R1 and the Conditional Approval letter, the Groundwater Quality Management Report will be submitted 60 days after the approval of the GAR and acceptance of the high vulnerability and high priority areas outlined in the GAR.

Thank you for considering our request. We look forward to hearing from you.

Submitted respectfully,

Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition