

* SAN JERARDO COOPERATIVE, INC. *



March 13, 2013

Jeffrey Young, Chair
Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, California 93401

RE: March 15 Board meeting, Agenda item 20; Agricultural Order, Cooperative Groundwater Monitoring Program

Dear Chair Young and Board Members:

On behalf of the above listed organizations we are writing to express our concern about the delay in instituting the groundwater monitoring that is an integral part of the Ag Waiver program.

March 15 marks the anniversary of your unanimous adoption of the Central Coast Ag Waiver. Our organizations strongly supported this order, in large part because it instituted groundwater quality monitoring as an early implementation step. The State Board, even though it voted in September to stay some parts of this order pending review, refused to stay the groundwater monitoring requirement, essentially agreeing with your stated imperative to address the severe drinking water issues in the region. Because so many Central Coast residents (up to 25%) rely upon domestic wells for their water supplies, it is imperative that we prioritize testing of shallow aquifer, both to identify communities that may be at risk of nitrate contamination, and to track changes in water quality. While there has been much discussion of the long time-frame to clean up the aquifer, this program can have a more immediate effect on many shallow domestic wells; just as they showed contamination first, they are also likely to respond to reduced nitrate loading in a shorter time frame.

We have learned that only about 20% of the growers in the region submitted water quality data from on-farm well testing in the last quarter of 2012, with most of the rest choosing to develop

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and participate in a cooperative groundwater quality monitoring program. The date for providing program plans to staff has been delayed (from August 2012 to March 2013), with the result that key water quality data is not being collected and the identification of water quality trends is being similarly delayed.

We sincerely hope that the plans submitted on March 15th are sufficient. We will be using the following criteria to review the plans;

- Data collection must begin in 2013;
- The plans will identify the number and location of monitoring wells that will be used to establish baseline water quality for both shallow aquifers that provide domestic water supplies and public supply aquifers;
- A proposal to confirm existing and identify new areas that are susceptible to contamination;
- Testing protocol that will track seasonal fluctuations in water quality.
- Monitoring for future years that will be sufficiently robust to identify and track water quality trends;
- Transparency. Data must be public. (Note: the GAMA Geotracker database scrambles well locations so that they are not geographically precise in order to address security concerns.)
- The provision of a list of members and the location of their property, and a demonstration how the program provides sufficient information to characterize the discharges from those properties.

The Board's role should be to ensure timely implementation of this program by ordering enforcement action against those growers that do not provide cooperative monitoring plans by the March 15 deadline. In addition, any delays in implementation of data collection should result in the Board implementing the on-farm well testing requirement that was included in the original order.

Several of us have been engaged in the development of the agricultural orders in the Central Valley and have found that the groundwater monitoring program proposed for those orders does not comply with the State Board's anti-degradation policy. The Central Coast ag waiver has provided a model that should be emulated, not abandoned. Your prioritization of public health and your recognition of the Board's responsibility to protect drinking water has been a hallmark of your actions to date. We urge you to continue that commitment and send a strong signal at the March 15 board meeting that further delay in instituting monitoring is not acceptable.

Sincerely,

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