

April 28, 2014

Mr. Kenneth A Harris Jr., Executive Officer  
Central Coast Regional Water Quality Control Board  
895 Aerovista Place, Suite 101  
San Luis Obispo, CA 93401-7906

Dear Mr. Harris,

The Central Coast Groundwater Coalition (CCGC) is requesting a 90-day extension of the deadline to complete the individual groundwater monitoring and reporting program requirement for the spring monitoring of individual wells in the southern portion of the CCGC region (San Luis Obispo, Santa Barbara and Ventura counties).

Additionally, the CCGC is requesting the removal of the requirement for analyzing groundwater from primary irrigation supply wells for the major ions listed in Table 3 of the MRP (MRP NO. R3-2012-0011-01, R3-2012-0011-02, R3-2012-0011-03) documents. The primary objective of the Coalition's work plan is to characterize groundwater quality for domestic consumption and the major ions are sampled to help with this characterization of the CCGC region. However, irrigation supply wells are generally screened at greater depths than domestic supply wells. Therefore concentrations of major ions in groundwater obtained from irrigation supply wells will not be useful in characterizing aquifers used for drinking water.

The 90-day extension is being requested to allow CCGC the time to meet its financial obligations, continue to provide service to its members and provide to the Central Coast Regional Water Quality Control Board (CVRWQCB) the critical information on the concentration of nitrates in domestic supply wells. Removing the ion analysis requirement ensures we do not expend scarce resources where corresponding benefits for knowledge gained are not realized.

When the State Water Resources Control Board Order allowed the CCGC to enroll individuals in the southern counties within the region, the CCGC Board of Directors provided individuals with the option of having their domestic supply and primary irrigation supply wells sampled by the CCGC. The data provided to the individuals by the CCGC would allow these members to fulfill their individual monitoring and reporting obligations under the Order.

In October 2013 when CCGC provided potential new members with this option, it was not known how many individuals would join the CCGC. Two hundred forty nine growers subsequently joined the CCGC and requested the coalition perform the individual sampling for them, necessitating the sampling last fall of more than 500 domestic and irrigation supply wells in the southern region. Although wells are still being identified, the CCGC believes that approximately 500 wells will need to be sampled in the second (spring) round of monitoring that is required by the Order. Of these wells, approximately 45% are irrigation supply wells.

The CCGC elected to collect dues from its members in two payments received two years apart. That fee structure did not anticipate the extremely large number of wells that would need to be sampled within the first two years to complete individual monitoring requirements in the south. As a result, the cost of completing two sets of well sampling events within the first year of CCGC operations can't be sustained with the funding currently available to the CCGC. In response, the CCGC is going to request the second round of dues from its members starting in September 2014. However, the CCGC anticipates that the receipt of sufficient funds to cover expenses associated with the second round of monitoring of individual wells will occur too late to cover expenses if the monitoring is conducted this spring as originally scheduled.

The CCGC is requesting that the CVRWQCB allow the Coalition to delay completing the sampling of individual wells for 90 days in the southern portion of its region which will allow time for the CCGC to collect the additional dues it needs to pay consulting firms and laboratories for the monitoring and reporting program implementation.

Specifically, the CCGC is requesting:

- Delay for 90 days (until June – July) the spring individual domestic supply/primary irrigation supply well monitoring in southern counties.
  - For domestic supply wells, the CCGC will analyze for the full suite of constituents in Table 3 of the MRPs as required by the Waiver whenever sampling occurs.

- For irrigation supply wells, the CCGC will analyze for nitrate as NO<sub>3</sub>, pH, specific conductance, and redox potential. Not analyzed would be total dissolved solids, total alkalinity, calcium, magnesium, sodium, potassium, sulfate, and chloride.

The CCGC request does not affect the monitoring in the northern portions of the CCGC region. All monitoring in the Salinas-Lockwood Valley, the Pajaro Valley, and the Gilroy-Hollister areas will be completed by September 1 as originally scheduled. In addition, the delay in the sampling of individual wells will not delay the submission of the final reports for either the northern or southern portions of the CCGC region, nor will the delay in sampling prevent individuals from submitting their monitoring data as part of their eNOI data submission requirements.

Your staff requested that the CCGC provide a redline markup of the MRP (MRP NO. R3-2012-0011-01, R3-2012-0011-02, R3-2012-0011-03) documents to reflect the requests outlined above. The markup is attached to this transmission. In addition, the CCGC is submitting an overview of its financial situation related to the delay requested.

Thank you,



Parry Klassen  
Executive Director



Tim Borel  
Chair, Board of Directors