

**CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD
DISCLOSURE FORM EX PARTE COMMUNICATIONS REGARDING PENDING
GENERAL ORDERS**

1. Pending General Order that the communication concerned:
Ag Order 4.0
2. Name, title and contact information of person completing this form:
Sarah Lopez, Executive Director, Central Coast Water Quality
Preservation, Inc., sarah@ccwqp.org / 831-331-9051
3. Date of meeting, phone call or other communication:
Time: afternoon, 10/15/19 Location: Wolff Vineyard, San Luis Obispo
4. Type of communication (written, oral or both):
Verbal discussion & handouts
5. Names of all participants in the communication, including all board
members who participated:
Sarah Lopez, Abby Taylor-Silva, Board Member Jean-Pierre Wolff, Board
Member Dr. Monica Hunter
6. Name of person(s) who initiated the communication:
Sarah Lopez & Abby Taylor-Silva
7. Describe the communication and the content of the communication.
Preservation, Inc. role limited to technical/logistical feedback and concept
development for proposed programs; participation in discussions does not constitute
a policy position [PDF attached]. Program concept outline for Regional Groundwater
Trend Monitoring Program (GTMP) [PDF attached]. Program concept discussion for
Surface Water Follow-Up Program.
8. Attach a copy of handouts, PowerPoint presentations and other materials any
person used or distributed at the meeting. If you have electronic copies, please
email them to facilitate web posting.
Two handouts distributed by Sarah Lopez are attached as PDF's. Additional
handouts distributed by Abby Taylor-Silva.

Clarification of Preservation, Inc. Role in Discussions
09/12/2019

Central Coast Water Quality Preservation, Inc. (Preservation, Inc.) manages the surface water Cooperative Monitoring Program (CMP) on behalf of Central Coast growers enrolled in the Region 3 Irrigated Lands Regulatory Program (“Ag Order”). The objectives of the CMP are to assess water quality status and trends in irrigated agricultural watersheds, and provide feedback to growers in areas of impairment.

Currently, Preservation, Inc. is a “third party group” whose role in the Ag Order involves implementing the surface water CMP and collecting/submitting the State Board ILRP fees on behalf of enrolled growers. Several groups have expressed interest in expanding Preservation, Inc’s third party role to address other aspects of the Ag Order, and Preservation, Inc. has formed an Exploratory Committee to evaluate some of the possible additional third party roles that have been suggested. These include an expanded surface water program to follow up on watersheds with high impairment as identified by CMP data; and a region-wide groundwater ambient trend monitoring program similar in objectives to the current surface water CMP.

Preservation, Inc. generally does not take a position on broad policy issues pertaining to the Ag Order, but may participate in discussions with other stakeholders who do have policy positions. Preservation, Inc’s role in these discussions is to provide feedback on the technical and logistical feasibility of proposed programs, and sometimes to assist with technical concept development when a program is proposed for future implementation by Preservation, Inc. Preservation, Inc’s participation in these discussions does not constitute a policy position on the topics discussed, except as related to Preservation, Inc’s ability to implement successful programs on behalf of Central Coast growers that are in the interest of water quality.

Please direct any questions about Preservation, Inc’s role to Sarah Lopez, Executive Director, sarah@ccwqp.org, 831-331-9051.

**CONCEPT FOR A REGIONAL
GROUNDWATER TREND MONITORING PROGRAM (GTMP)
09/12/2019**

1. INTRODUCTION

There is a universally recognized need to document the current status and track changes in groundwater quality over time as agricultural management practices change. This document outlines a concept for a region-wide, long-term Groundwater Trend Monitoring Program (GTMP) for the Central Coast Ag Order.

2. OBJECTIVES

- Integrate data collection and analysis for the ILRP with existing and future sub-regional groundwater management programs to reduce duplicative efforts and maximize the value of datasets.
- Assess the current status of groundwater basins in irrigated agricultural areas of the Central Coast;
- Evaluate long-term trends in groundwater quality (10+ years);
- Differentiate water quality impairments and trends associated with irrigated agriculture from other sources;
- Provide feedback to growers in basins with impaired groundwater quality.

Monitoring of on-farm drinking water wells is a separate issue, and not part of the GTMP concept.

3. CHARACTERIZATION OF EXISTING PROGRAMS, DATASETS, & BASINS

This work would inventory existing groundwater monitoring programs; inventory existing publicly available groundwater datasets; and name and characterize the groundwater basins or management areas to be included in the GTMP. It would build upon prior work by the Central Coast Groundwater Coalition (CCGC) and seek to avoid duplication. The outcome of this task would be one or more reports that characterize both the existing state of knowledge/monitoring and the additional needed information that the GTMP design should seek to address.

4. MONITORING DESIGN

4.1 WELL NETWORK DEVELOPMENT

A key goal of this approach is to rely on existing groundwater monitoring programs and add existing irrigation or domestic wells as needed to fill identified gaps in the network.

4.1.1 SPATIAL DESIGN

While balancing network density with economic considerations, the GTMP will aim to characterize water quality in hydrogeologically-defined groundwater basins that have a substantial portion of the overlying surface area in irrigated agricultural land use. Well network coverage will be reviewed to ensure sufficient representation of areas located down-gradient of agricultural activity, particularly in the vicinity of disadvantaged

communities. Lower-density coverage may be warranted in areas deemed to be of particularly low vulnerability.

4.1.2 INDIVIDUAL WELL CHARACTERISTICS

For inclusion in the GTMP well network, preferred wells will have certain known information, most importantly the well depth, perforation depths, construction date, a sounding hole or other access port, and ideally (though not always available) the well seal information and a well completion report.

4.2 WATER QUALITY MONITORING

4.2.1 DIRECT SAMPLING BY GTMP

Wells sampled directly by the GTMP will be sampled on a regular schedule (example: annually in the fall) for a suite of necessary parameters (examples: nitrate, specific conductance, etc). Sampling will be conducted according to standard groundwater sampling protocols, including appropriate purging prior to sample collection.

4.2.2 SAMPLING BY OTHER PROGRAMS

Data acquisition from other programs will target the same parameters that are directly tested by the GTMP. Quality assurance protocols from other programs will be reviewed prior to use of those programs' data to ensure adequacy to meet GTMP objectives. The GTMP will maintain a uniformly-formatted, compiled dataset for the purpose of network-wide groundwater analysis and narrative reporting. This dataset will be provided in raw form (flat, formatted) as an appendix to any reports for which it is used by the GTMP in fulfillment of an MRP requirement.

5. REPORTING AND REVIEW

Data will be managed electronically for internal purposes and also submitted electronically to the Water Board as an annual Electronic Data Deliverable (EDD). Narrative reports to be submitted approximately every 5 years. Narrative reports will display tabulated and/or graphed data and include discussion of current groundwater status for each basin/management area. Narrative reports will also include statistical trend analysis on Nitrate and TDS (examples: Mann-Kendall, Akritas-Thiel-Sen, or similar).

6. QUALITY ASSURANCE

The GTMP will designate a Quality Assurance (QA) Officer to review results for accuracy, precision, and acceptability. Quality assurance/control standards will be documented in a Quality Assurance Project Plan (QAPP). Field instruments will be maintained and calibrated according to manufacturer specifications, and capable of achieving the reporting limits and precision levels specified in the QAPP. Samples for lab analysis will be handled under chain-of-custody, at temperatures and within holding times that meet lab-specified standards documented in the QAPP. Any lab contracted by the GTMP will have current ELAP certification.

As applicable, a licensed hydrogeologist will be involved in detailed program design and implementation. Research in support of the GTMP concept thus far has involved consultation with several active Central Coast hydrogeologists and review of existing

California groundwater monitoring programs and work plans, including two Central Coast programs approved by the DWR as SGMA alternatives.

7. EDUCATION AND OUTREACH

The GTMP will perform groundwater education and outreach for its enrolled growers. The focus will be raising industry awareness of specific areas of groundwater impairment throughout irrigated agricultural areas of the Central Coast, and possible linkages to past and current production practices. A summary of outreach activities will be provided in each narrative monitoring report.

8. GOVERNANCE AND FUNDING MECHANISMS

The GTMP will be implemented by a Water Board-approved Third Party. Other details to be determined.

9. TIMELINE AND DELIVERABLES – TO BE DETERMINED

DRAFT Surface Water Follow-up Process: Regional Board Perspective

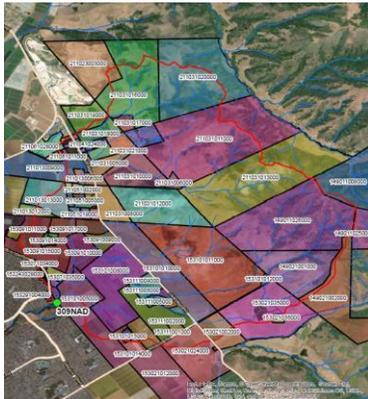
Document for Discussion Purposes with RB Staff and Board

Watershed	Watershed Name	Watershed ID	Watershed Description
Watershed 001	Watershed 001	001	Watershed 001 Description
Watershed 002	Watershed 002	002	Watershed 002 Description
Watershed 003	Watershed 003	003	Watershed 003 Description
Watershed 004	Watershed 004	004	Watershed 004 Description
Watershed 005	Watershed 005	005	Watershed 005 Description
Watershed 006	Watershed 006	006	Watershed 006 Description
Watershed 007	Watershed 007	007	Watershed 007 Description
Watershed 008	Watershed 008	008	Watershed 008 Description
Watershed 009	Watershed 009	009	Watershed 009 Description
Watershed 010	Watershed 010	010	Watershed 010 Description
Watershed 011	Watershed 011	011	Watershed 011 Description
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Watershed 047	Watershed 047	047	Watershed 047 Description
Watershed 048	Watershed 048	048	Watershed 048 Description
Watershed 049	Watershed 049	049	Watershed 049 Description
Watershed 050	Watershed 050	050	Watershed 050 Description

1. Watershed Selection

Regional Board, working with Third Party, identifies all high priority watersheds. A certain number are selected to address in a specific time period. Additional watersheds are added at a time schedule identified by the Regional Board and the Third Party.

Deliverables: Regional Board-produced list of watersheds



2. Watershed Delineation & Parcel ID

GIS work is delineated, although not ground-truthed. Assessor parcels with APN labels are shown. APNs link to Preservation, Inc's CMP Enrollment Database (or Region 3's Ag Order enrollment dbase) for grower contact info.

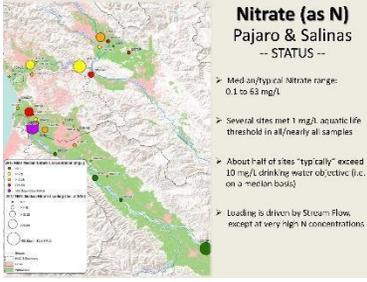
Deliverables: Regional Board-produced Watershed Delineation in a file-type agreed upon by the Regional Board and third party.



3. Notifications to Growers

Initial letter from Region 3. Details two paths forward: Work with Third Party Group or Follow Regional Board Plan.

Deliverables: Letter from Regional Board



4. Initial Watershed Report & Site Visit

The Third Party produces a presentation/report on the watershed, detailing challenges and impairment. All growers in the watershed invited. Growers send to the Regional Board a Notice of Intent opt-in to the third party (with a copy to the third-party group) to let them know of pathway selected.

Of the ranches that choose to participate with the third-party group, each ranch in the watershed receives a site visit by the third-party group.

Deliverables: Query of Regional Board eNOI/ACF Data, Initial Watershed Report detailing impairments, challenges, and summary of current ACF practices (provided to grower and Regional Board), Farm Visit Checklist (stays with Preservation, Inc.); Grower Self-Evaluation (stays on-farm); documentation of initial communication with ranches in the watershed provided by Third Party to RB.



5. Changes Made to Management Practices

Within a set period of time of no more than one year, growers will take steps, based upon the “diagnosis” made in step 4 consisting of the Farm visit checklist and the grower self-evaluation, to “self-prescribe” practices that are reasonably believed to lead to water quality improvements in the watershed/sub-watershed.

6. Growers Update Management Practices on their On-Farm Surface Water Management Plan and ACF

Growers will come away from the site visit with a list of Potential areas in need of improvement. They will have a responsibility to address these within specified time periods, no more than one year’s time. ACF is updated to be consistent with updates to the Surface Water Management Plan.

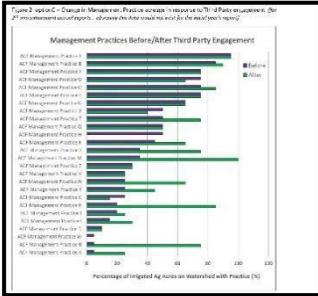
Deliverables: Surface Water Management Plan (stays on-farm)



7. Water Quality Monitoring Continues, Third Party Queries Updated ACF Reports

Within the designated time period of no more than one year, the third party queries the ACF details for the APNs in the watershed and begins work characterizing the changes in the watershed. The Third Party will conduct follow-up visits to confirm practices have been implemented.

Deliverables: Query of Regional Board eNOI/ACF Data



8. Subsequent Watershed Report Submitted to Regional Board

The third party will produce a report using Preservation, Inc. data illustrating changes at the CMP sites associated with this watershed/sub-watershed, and aggregated changes in management practices.



Adaptive Management (Steps 5-8) Backstop:

Following a set period of time, applicable to that watershed, the following would occur if watershed improvement isn't meeting timelines set.

Year X: Individual Verification evaluation and assessment if limited Improvement Ranches on that watershed would require certification of management practices and an assessment of management practice effectiveness. In exchange, more time would be provided to show improvement.

Year Y: Board Public Review of Changes and Assessment of Improvement

A public meeting would be held with board members to discuss changes in the watershed, and detail the watershed reports and progress made, in an effort to continue adaptive management and set new timelines and milestones compatible with technical constraints.

