

**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: 6pm, 9/23/19 Location: Marina, CA
4. Type of communication (written, oral or both):  
Verbal discussion including handouts
5. Names of all participants in the communication, including all board members who participated:  
Sarah Lopez, Abby Taylor-Silva, Board Member Bruce Delgado
6. Name of person(s) who initiated the communication:  
Sarah Lopez
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](mailto: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