

# Central Coast Water Quality Preservation, Inc.

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Public Comment  
Agricultural Expert Panel  
Deadline: 5/14/14 by 12:00 noon  
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May 14, 2014



Expert Panel  
c/o Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Re: Expert Panel Question #3

Expert Panel;

Central Coast Water Quality Preservation, Inc. (CCWQP) manages the Cooperative Surface Water Monitoring (CMP) for Central Coast farmers in compliance with the CCRWQCB Ag Order. The Central Coast RWQCB Ag Order requires all irrigated farmers to enroll directly with the Regional Board. Growers are required to either participate in a cooperative surface water monitoring program or conduct their own monitoring program, which could cost over ten times as much as the cooperative program. 98% of central coast farm operators, about 1,800, have elected to participate in the CMP, representing 400,000 irrigated acres, over 99% of the irrigated land.

The CMP has monthly monitored 50+ representative public access sites in agricultural areas, ranging from Gilroy to Carpinteria, since January 2005. The monitoring includes constituent analysis, toxicity tests and bioassessment. The results are reported to CCAMP and CEDEN, and are available to the public.

The expert panel has been charged with assessing existing agricultural nitrate control programs and making recommendations regarding risks to surface and groundwater, among other related goals. A set of 13 questions was posed to the panel. As CCWQP deals with monitoring of surface water in agricultural areas throughout the central coast the comments are limited to this area, particularly:

“Question #3: How can risk to or vulnerability of surface water best be determined in the context of a regulatory program such as the ILRP?”

The existing CMP program for the CCRWQCB Ag Order as presently designed meets the objective of assessing risk and vulnerability of surface water in the agricultural regions of the Central Coast.

The 9+ years of monthly surface water monitoring data are sufficient to show trends and current status of the surface water in all significant agricultural areas within the central coast. The data shows that many monitoring sites have statistically significant positive trends. Many sites have improved from high to total toxicity and are now repeatedly showing no toxicity. Surface water runoff from farm fields has been reduced across the region due to improved irrigation practices resulting in many sites which are dry during the irrigation season. Nitrate loading had been significantly reduced at most of the CMP sites, while concentration has remained only slightly changed.

As part of the CMP additional upstream follow-up monitoring was conducted over 12 months above the most impaired CMP sites. This showed that the source of impairment was widely spread over the sub-watersheds, with no hot spots nor major individual contributions. As a result it validates that the core CMP sites are representative of the sub-watersheds.

This is not to imply that there are no agricultural areas which are highly impaired. Impairment remains. In summary:

- CMP sites on the main stem of the major rivers in the region meet most if not all current TMDLs for toxicity, nitrate and pesticides. The rivers meet the current TMDL drinking water standard for nitrate. Turbidity and sediment vary by river.
- Agricultural sub-watersheds and drainages which are not dominated by tile drains are improving and appear that most of these sites will achieve, or already achieve, current TMDLs within the timeframe adopted for the specific constituent. Some of the sites in this group already meet current drinking water nitrate standards, and the remainder are on track to meet the standard within the 12 year target of the Nutrient TMDL.
- Tile drain dominated CMP sites are more problematic and may require additional time or allowances regarding nitrate targets. Tile drain water discharged from fallow fields is in some cases higher than discharges during irrigation.

CCWQP can provide supporting data and trend analysis to support the above summary upon your request. Please contact me if you have any questions regarding the above.

Sincerely  
Central Coast Water Quality Preservation, Inc.



Kirk F. Schmidt  
Executive Director

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