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## Central Coast Regional Water Quality Control Board

June 25, 2015

***Via Electronic Mail Only***

Mr. Parry Klassen  
Executive Director  
Central Coast Groundwater Coalition  
P.O. Box 828  
Salinas, CA 93902  
[pklassen@unwiredbb.com](mailto:pklassen@unwiredbb.com)

Dear Mr. Klassen,

### **IRRIGATED LANDS REGULATORY PROGRAM – APPROVAL OF THE CENTRAL COAST GROUNDWATER COALITION FINAL NORTHERN COUNTIES CHARACTERIZATION REPORT AND TECHNICAL MEMORANDUMS**

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) received your letter transmitting the report titled, “*Final Report, Northern Counties Groundwater Characterization: Salinas Valley, Pajaro Valley and Gilroy-Hollister Valley*” (Final Northern Counties Characterization Report), dated June 1, 2015. The Final Northern Counties Characterization Report was prepared by Luhdorff & Scalmanini Consulting Engineers (LSCE) and submitted on behalf of the Central Coast Groundwater Coalition (CCGC). The Final Northern Counties Characterization Report is a compilation of the valley-specific characterization reports (Technical Memorandums), an analysis of data gaps and limitations, and final conclusions.

The Final Northern Counties Characterization Report and Technical Memorandums, including the associated contour maps represent CCGC’s interpretation of groundwater quality in agricultural areas of the Salinas Valley, Pajaro Valley and Gilroy-Hollister Valley groundwater basins. As Central Coast Water Board staff has discussed with CCGC on multiple occasions, the groundwater monitoring data reported to the Central Coast Water Board in compliance with the Agricultural Order may be interpreted in different ways depending upon the underlying geologic assumptions and the hydrogeologic conceptual model used. Notwithstanding, Central Coast Water Board staff finds that CCGC’s Final Northern Counties Characterization Report and Technical Memorandums include the required information and adequately address the comments described in our March 20, 2015 and May 18, 2015 letters.

During the course of our review of the submittals discussed above, staff became aware of the possibility that CCGC did not sample all domestic drinking water wells for CCGC member properties enrolled in the Irrigated Lands Regulatory Program. The requirement to monitor all domestic drinking water wells is a significant priority in both the Central Coast Water Board

Order R3-2012-0011 and State Board Order WQ-2012-0101 due to the compelling concerns regarding unsafe drinking water safety due to excessive nitrate in groundwater.<sup>1</sup> This potential undersampling of domestic wells is a significant area of concern and potential violation of Order R3-2012-0011 and associated Monitoring and Reporting Program (MRP) requirements, including the CCGC Workplan for the Northern Counties. Data from any domestic drinking water well not sampled by CCGC is not included in the Final Northern Counties Characterization Report, Technical Memorandums, or associated contour maps, however, staff does not want to further delay finalizing these documents now. Water Board staff is currently evaluating this domestic well undersampling issue with CCGC staff and consultants and we will provide follow-up direction in a separate letter. If the inclusion of data from additional domestic drinking water wells not yet sampled by CCGC results in a different interpretation than that described in the Final Northern Counties Characterization Report, Technical Memorandums and associated contour maps, we may require CCGC to revise those submittals.

Therefore, I hereby accept the Final Northern Counties Characterization Report and associated Technical Memorandums as conditionally complete and final, subject to any required revisions as detailed above. We appreciate CCGC's efforts to continue to work cooperatively with the Central Coast Water Board. If you have any questions concerning this letter, please contact Hector Hernandez at (805) 542-4641 or via e-mail at [hhernandez@waterboards.ca.gov](mailto:hhernandez@waterboards.ca.gov), or Angela Schroeter at (805) 542-4644 or via e-mail at [aschroeter@waterboards.ca.gov](mailto:aschroeter@waterboards.ca.gov).

Sincerely,

Kenneth A. Harris Jr.  
Executive Officer

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<sup>1</sup> State Water Resources Control Board Order WQ-2013-0101, adopted September 24, 2013.  
[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2013/wqo2013\\_0101.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2013/wqo2013_0101.pdf)

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