



January 26, 2006

Mr. Matthew Keeling
California Regional Water Quality Control Board
Central Coast Region
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

STATE OF CALIFORNIA
CENTRAL COAST REGION

Received

JAN 30 2006

895 Aerovista Place, Ste. 101
San Luis Obispo, CA 93401-7906

Subject: CRWQCB Draft Order No. R3-2006-0016 (Furtado Dairy)

Dear Mr. Keeling,

The Groundwater Management Unit of the Santa Clara Valley Water District (District) has reviewed the California Regional Water Quality Control Board-Central Coast Region (Board) Draft Order No. R3-2006-0016 (Order) for the Furtado Dairy Property. After reviewing the Draft Order, it appears the majority of concerns regarding groundwater are addressed appropriately, with the following exceptions:

- 1) Considering the groundwater gradient is moving in the southwesterly direction, and the lack of monitoring points at the western section of the property. The District suggests the addition of a groundwater monitoring well at the south-western edge of the property to monitor the shallow groundwater for any possible off-site movement of constituents from the northern irrigation disposal area.
- 2) We suggest groundwater monitoring be conducted on a quarterly basis instead of a semi-annual basis to more accurately track any changes in constituent concentrations (the frequency may decrease after the first couple of years, see Item 4).
- 3) In the Order (Under Provisions, Item No. 6, page 18) reference is made to the implementation of a Nutrient Management Plan (NMP) and the need for the Discharger to comply with the NMP as specified in Appendix C. However, the requirements for the NMP in Appendix C do not specifically give target measures by which the Discharger can show compliance with the Order; instead reference to comply with the Order is made. This circular referencing does not provide a good measure of the NMP, or set NMP target guidelines.
- 4) For the groundwater monitoring programs, we suggest including language regarding trends and possible additional monitoring. That is, should concentrations (i.e. Nitrate) remain steady or decrease with time, then a revised schedule for monitoring may be in order, or if concentrations increase the Board may require additional monitoring wells be installed off-site down-gradient and cross-gradient to the property to capture any migrating constituents.

Thank you for the opportunity to comment on the Order. Should you have any questions or comments, please contact Henry Barrientos at (408) 265-2607, extension 2078 or at HBarrientos@valleywater.org.

Sincerely,

Behzad Ahmadi
Groundwater Management Unit Manager

Cc: M. Richardson, G. Cook, H. Barrientos, Y. Liu

Item No. 7 – Attachment No.5
Furtado Dairy WDR Re-Issuance
March 24, 2006 Meeting