



Central Coast Regional Water Quality Control Board

Via Electronic Mail Only

DATE: May 31, 2016

TO: Ms. Jeanine Townsend
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John M. Robertson

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FROM: John M. Robertson
Executive Officer
CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD

SUBJECT: SWRCB/OCC FILES A-2239(a)-(c): REVIEW OF WASTE DISCHARGE REQUIREMENTS GENERAL ORDER NO. R5-2012-0116 FOR GROWERS WITHIN THE EASTERN SAN JOAQUIN RIVER WATERSHED THAT ARE MEMBERS OF THE THIRD-PARTY GROUP

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff provides the comments below in response to the State Water Resources Control Board's (State Board) solicitation letter dated February 8, 2016, inviting comments on both the policy direction expressed in the proposed order and the proposed revisions to the Central Valley Regional Water Quality Control Board (Central Valley Water Board) Order No. R5-2012-0116 (Eastern San Joaquin Agricultural General Orders). Central Coast Water Board staff is specifically commenting on those areas of the proposed order that potentially set a precedent for future Irrigated Lands Regulatory Program (ILRP) orders in the Central Coast region, or relate to requirements implemented pursuant to the Central Coast Water Board's current Order R3-2012-0011, Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands. Growing practices, geologic and hydrologic settings, and climatic conditions vary radically throughout the state and establishing a precedential order that does not encompass flexibility to protect water quality within the context of that variability inappropriately prioritizes statewide consistency/conformity over regional adaptation to specific, local criteria, and oversimplifies the complex work within the ILRP.

SUMMARY

The Central Coast Region has approximately 435,000 acres of irrigated land and approximately 4300 individual farms/ranches which may be generating wastewater. In addition, nitrate pollution of drinking water supplies is a critical problem throughout the Central Coast Region. Additionally, studies indicate that fertilizer from irrigated agriculture is the largest primary source of nitrate pollution in drinking water wells, and that significant loading of nitrate continues as a result of agricultural fertilizer practices.

Central to the protection of drinking water resources and surface water quality, the effective regulation of discharges from irrigated lands must ensure that the Water Board can efficiently identify, prioritize, and evaluate waste discharges, and determine/measure progress towards reducing waste discharges and protecting beneficial uses, such that we can adapt and maximize our efforts in a timely manner. In addition, while the Central Coast Water Board and growers advance efforts to implement the ILRP, we must take urgent and appropriate actions to ensure that individuals and communities whose drinking water is unsafe are properly notified and have access to safe, clean and affordable replacement water, consistent with the Human Right to Water. While protection of water quality is complex and additional research might be beneficial, the Central Coast Water Board cannot delay action and measurement to verify our current progress in protecting water quality and ensuring safe drinking water right now.

We recognize that agricultural practices manifest differently in every region, making each region unique, and we understand that our mission is to develop and enforce water quality objectives and take actions that will best protect the region's waters while recognizing our local differences in farming, climate, topography, geology, and hydrology. The proposed order states that the discussed recommendations not only apply to the Eastern San Joaquin Agricultural General WDRs, but would also apply to the next generation of regional water quality control board agricultural regulatory programs statewide, and that the conclusions in this precedential order would apply statewide. Thus, with respect for this diversity of agricultural practices and climatic and geographic/geologic settings throughout the state, our comments below reflect what is the minimum necessary to effectively implement the ILRP in the Central Coast Region. Our comments do not speculate regarding what is necessary or appropriate for the Central Valley Region. In addition, the proposed order is comprehensive and we do not attempt to respond to all areas. Instead, we focused our comments on the areas of the proposed order that have the greatest potential to affect and/or inappropriately limit the Central Coast Water Board's ILRP, as summarized in the following:

1. **The final order should provide flexibility for Regional Boards to adopt ILRP orders for individual growers and/or third party coalitions.** The Central Coast Water Board supports third parties to provide technical assistance and expertise to growers to control the discharge of waste and implement best management practices to address priority water quality impairments. In addition, the Central Coast Water Board supports third parties to help achieve economies of scale to minimize costs, while maximizing effectiveness (e.g., group or watershed-scale monitoring, design and construction of management measures, industry-led environmental certification programs). The Central Coast Water Board does not support third parties for the purpose of reducing transparency or availability of data to the Regional Board and has demonstrated a balanced approach to achieving transparency while supporting third-party coalitions.
2. **The final order should not limit the Central Coast Water Board's ability to require growers to submit specific information directly to the Central Coast Water Board.**

We recommend Alternative 2, as outlined in State Board staff's Notice of Written Public Comment, requiring growers to submit farm specific management practice information and nitrogen application data to the Central Coast Water Board within the first year of any new ILRP order; this is consistent with our current ILRP order. The final order should not limit the Central Coast Water Board from maintaining or establishing new requirements that allow staff direct and immediate access to all ranch-level, water quality-related, reported data.

3. **The final order should memorialize for Regional Boards what minimum requirements are necessary in ILRP orders to achieve consistency with applicable policy and court decisions.** We recommend removing the language in the final order stating that the conclusions are precedential. Instead, include discussion that Regional Boards have the flexibility to develop ILRP orders that are functionally equivalent to, or exceed, requirements in the final order. The final order should include discussion confirming that, consistent with the Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program, that Regional Boards "have *broad flexibility and discretion* in using their administrative tools to fashion NPS management programs, and are encouraged to be as innovative and creative as possible, and, as appropriate, to build upon Third-Party Programs."
4. **The final order should not affect the Central Coast Water Board's ability to maintain and establish requirements to monitor all drinking water supply wells** on properties enrolled in the ILRP, at least twice within the first year of monitoring.
5. **The final order should not require growers or third parties to conduct annual repeat sampling in cases where the sampling indicate nitrate concentration is at or near 8 mg/L nitrate + nitrite as N.** We recommend modifying the final order to provide the Regional Board flexibility to require repeat sampling or sampling at an increased frequency, as they deem appropriate and necessary.
6. **The final order should emphasize the importance of notifying well users of unsafe drinking water, and require growers and landowners enrolled in ILRP orders to notify well users.** However, we recommend that associated follow-up be conducted by the Division of Drinking Water (DDW), in coordination with county environmental health officers. In addition, we also recommend that for all other drinking water wells, DDW or county environmental health will notify the users promptly, consistent with their established notification protocols established for larger system wells.
7. **The final order should attempt to strike a balance between doing away with requirements based on risk (or vulnerability) altogether, and allowing Regional Boards the flexibility to develop requirements based on risk.** A potential strategy might be to initially apply the proposed requirements to all risk categories, and then require higher frequency reporting for those operations posing greater risk.
8. **The final order should not affect the Central Coast Water Board's ability to require nitrogen applied data reporting in the Central Coast Region, consistent with our current ILRP order.** We also strongly recommend that the final order allow the flexibility for Regional Boards to collect nitrogen applied data from areas and growers we conclude pose a threat to water quality, without this information first being reported to a third party, including ranch level and/or aggregated level data. We further recommend that the Central Coast Region retain the flexibility to collect this information in a format

we deem necessary for our filing and data access needs; for example, our current electronic report format allows us to efficiently incorporate reported information into a database file.

9. **The final order should allow the Central Coast Water Board to require growers to report total nitrogen applied, total nitrogen removed, and the A/R ratio, in the Central Coast Region.** We recommend retaining the flexibility for continued reporting directly to the Central Coast Water Board as an option and our continued discretion to require the data where and when warranted, e.g., from higher risk areas and operations. Central Coast Water Board staff supports the development of A/R ratio targets as a performance metric in the Central Coast Region. The targets should be developed locally using an approach reflecting current knowledge and local farming conditions in the Central Coast Region.
10. **The final order should enable the Regional Board to require reporting of INMP information.** Central Coast Water Board staff supports INMP, INMP Summary Reporting and INMP certification, in the Central Coast Region. We recommend that regional flexibility be retained to invoke the reporting requirement when and where we conclude the risk to water quality warrants the requirement, and the flexibility to not require the reporting when and where lower risks warrant. We also recommend that the Central Coast Region retain the discretion to collect INMP and INMP Summary Report information directly from the grower or through a third party, as we deem appropriate. We also recommend that the Central Coast Region retain the discretion to develop the required INMP and INMP Summary Report content and format; doing so will ensure consistency with our information management needs.

DISCUSSION

REPORTING ALTERNATIVES 1, 2 OR 3

The implementation of the Central Coast Water Board Order R3-2012-0011 provides information for the level of reporting necessary to effectively regulate agricultural discharges to reduce loading and protect beneficial uses in a timely manner. The Central Coast Water Board's experience indicates that sufficient data must be available to evaluate relative risk to water quality from individual farms/ranches, waste discharge and loading from individual farms/ranches, and impacts to beneficial uses. In addition, sufficient data must be available to the Central Coast Water Board to determine if growers are making sufficient progress towards waste discharge- and loading reduction.

Reporting Alternative 2 described in the State Board's transmittal letter requires that growers submit farm/ranch specific management practice implementation and nitrogen application data to the Central Valley Water Board within the first year of implementation of the proposed order. This reporting requirement is consistent with the current implementation of the Central Coast Water Board. The Central Coast Water Board has found that such reporting is possible by growers and enables staff to analyze the reported data from a subset of growers determined to be highest risk. As a result of the farm/ranch specific reporting, Central Coast Water Board staff follow-up with individual growers to address waste discharge and loading, identify appropriate next steps, and refer them to technical assistance programs. In areas where drinking water beneficial uses are also impacted, the farm/specific reporting enables Central Coast Water Board staff to follow-up to verify what growers are doing to reduce discharge and nitrate loading, and to specify reasonable timeframes for making improvements to protect drinking water.

Given the urgency to protect drinking water sources, Central Coast Water Board staff objects to reporting alternatives which delay or prevent us from identifying and following-up with individual farms/ranches that are at highest risk because they have the greatest need to reduce discharge and loading, to protect water quality and beneficial uses. Central Coast Water Board staff supports providing reasonable timeframes for which the grower is able to seek assistance and make improvements and reduce waste discharge and loading. Central Coast Water Board staff does not object to Third Parties, especially related to the technical assistance they provide growers in compliance assistance and implementation of best management practices necessary to reduce loading, address priority water quality impairments, and protect beneficial uses.

Precedent and Regional Board Flexibility to Develop Agricultural Orders

Central Coast Water Board staff appreciates the goals of establishing precedential requirements to guide irrigated lands programs across the state; providing consistency with adopted policy and court decisions is both good for the regulated community and is also in the public's best interest.

Interested parties have commented on the precedential nature of the proposed order at the May 4, 2016 and May 17, 2016 workshops. Central Coast Water Board staff echoes some of the same concerns discussed at these workshops. Please consider the following:

Farming practices, covering both what is farmed and how crops are farmed, vary drastically across the regions, and in some cases, across commodities. A lettuce grower in the Central Coast Region may use 250 pounds/acre of nitrogen and two acre-feet of water to grow a crop, growing in an alluvial valley with shallow groundwater, planting several crop rotations in a year. As a result of multiple crops, the nutrient loading per acre is potentially far greater than for single-crop acreage, thereby increasing threat to water quality. However, a grape grower in another region will likely use a fraction of this amount of nitrogen and water on this perennial crop, perhaps growing on a hillside where the depth to groundwater could be far deeper than the lettuce grower. Each grower poses a unique threat to water quality, based on farming practices, crop types and frequencies, climatic conditions, and geologic and groundwater factors. Regulatory requirements should be commensurate to threat. It will be very difficult and inappropriate to develop precedential requirements that are appropriate across all regions and commodity groups that are consistently commensurate to threat to water quality.

An order that is precedential, without significant flexibility or detail regarding what is precedential and why, could be interpreted as one-size-fits-all, thereby establishing a difficult public process for regions developing orders, due to limitations in establishing substantive, water quality-protecting requirements.

As an alternative, precedential requirements could establish a bar for Regional Boards in the development stages of ILRP orders, doing so could help establish minimum requirements for consistency with policy and legal decisions; we support this concept. However, the established bar (i.e., the precedents) should not be used to justify reducing adopted or potential requirements that help determine loading, and may go beyond the minimum needed for consistency with policy and legal decisions to effectively protect water quality, where warranted.

The proposed order could be interpreted as directing Regions to establish third-party coalitions that serve several functions, including the collection, compilation/aggregation and summarization of grower reported data and information that is ultimately forwarded to the Regional Board. Some Regions may have ability, due to many factors, to collect and manage data delivered by the grower without an intermediary, such as a coalition. Growers should also

be provided the choice as to whether they join an approved coalition or not, rather than be mandated into one method for compliance. We have found a strong “do-it-yourself” element within our region’s growers and want to respect that element of the regulated community. Additionally, it is the specific type of data and information that is reported by growers that is needed to provide consistency with policy and legal decisions, and not “how” this information is reported to a Regional Board, e.g. aggregated or through a third-party coalition. It is important to make this distinction in the final order. The Central Coast Water Board does not support third parties for the purpose of reducing transparency or availability of data to the Regional Board.

Recommendations:

1. Remove the precedential language in the final order. Instead, memorialize for the Regions what conditions should trigger specific requirements, and why, so Regional Boards can use local information to develop ILRP orders consistent with policy and legal decisions.
2. Include discussion that Regional Boards are not prevented from establishing ILRP orders that are functionally equivalent to, or exceed, the base or minimum requirements in the final order.
3. Include discussion consistent with nonpoint source policy, that Regional Boards “have *broad flexibility and discretion* in using their administrative tools to fashion NPS management programs, and are encouraged to be as innovative and creative as possible, and, as appropriate, to build upon Third-Party Programs.”

Regional Boards should have the flexibility to develop and implement ILRP programs that address regional water quality priorities and issues, given the local differences in agricultural land use, scale, cropping patterns, discharge characteristics, climate, topography, geology, and hydrology. Specific regulatory strategies may not be effective in all regions and Regional Boards must retain appropriate autonomy to maximize water quality protection. Regional programs can be coordinated by using existing state-wide data management systems (e.g. GeoTracker, CEDEN, etc.)

Regional Board Direct Access to Data

The Central Coast Region has successfully established and implemented electronic and/or online reporting of: grower enrollment; total nitrogen applied; groundwater well monitoring results; ranch level information on irrigation, crops grown, loading risk to groundwater, and management practice implementation. We can access and review this information immediately, when needed. The information is uploaded and stored in database format in existing State Water Board data management systems, rendering retrieval and assessment of large datasets manageable and immediate for Central Coast Water Board staff. Similarly, immediate access to ranch level data is central to our strategy for effectively and efficiently implementing the ILRP order, given the limited staff resources available for this program.

In the Central Coast Region, access to data is critical to resolve water quality problems. Farm-specific monitoring and reporting, submitted directly to the Central Coast Water Board is critical to inform regulators, growers, industry groups, and the public to identify and implement solutions, measure progress, and adapt individual and collective efforts to protect water quality and beneficial uses.

Domestic well and irrigation well monitoring and reporting, submitted directly to the Central Coast Water Board using GeoTracker is critical to assess human health threats associated with

water quality in agricultural areas and protection of beneficial uses, especially in preparation for more detailed groundwater trend monitoring along flow paths at specific known depths. Recommendation: the final order should not limit the Central Coast Water Board from maintaining or establishing new requirements that allow staff direct and immediate access to all ranch level reported data.

Groundwater Monitoring and Drinking Water Exceedance Notification

Consistent with State Board Resolution No. 2016-0010 adopting the Human Right to Water as a core value and directing its implementation in Water Board Programs and Activities, the Central Coast Water Board agrees that protecting public health and ensuring safe drinking water is among the highest priorities for the Water Boards. Central Coast Water Board staff agrees with the proposed order's requirements to directly monitor all drinking water supply wells on properties enrolled in the ILRP, at least twice within the first year of monitoring. This is consistent with the Central Coast Water Board's ILRP order and these requirements have been successfully implemented with minimal cost to the Central Coast Water Board and growers.

As of December 2015, growers have sampled approximately 4000 groundwater wells in compliance with Central Coast Water Board Order R3-2012-0011 and MRPs, including approximately 1733 domestic drinking water wells and approximately 2266 irrigation wells. The requirements use standardized sampling and analytical methods, and laboratories are certified by the Division of Drinking Water Environmental Laboratory Accreditation Program (ELAP) and upload the data directly to the Water Board's GeoTracker data management system. The use of standard sampling and analytical methods and the electronic upload of water quality data directly from the lab to GeoTracker has resulted in the timely and cost-effective submittal of high quality data to the Central Coast Water Board. Central Coast Water Board staff recently shared the groundwater monitoring results with the public at the March 2016 Central Coast Water Board Meeting. The staff report can be found at:

http://waterboards.ca.gov/centralcoast/board_info/agendas/2016/march/item19/item19_stfrpt.pdf

Central Coast Water Board staff disagrees with the proposed order's requirements to conduct annual repeat sampling in cases where the sampling indicate nitrate concentration is at or near 8 mg/L nitrate + nitrite as N. Pursuant to State Board Order WQ-2013-0101, similar requirements apply to the Central Coast Groundwater Coalition (CCGC). Based on four years of implementation, Central Coast Water Board and CCGC have found this requirement costly and difficult to implement due to the variability in nitrate concentration in groundwater. Based on ILRP groundwater monitoring data reported to the Central Coast Water Board from 2012-2016, staff has determined that the probability of a repeat sample exceeding the maximum contaminant level (MCL) is not necessarily related to the prior concentration. Additionally, applying annual repeat sampling only to a subset of the groundwater wells that exceed 80% of the MCL at a particular time results in an inconsistent dataset for a subset of groundwater wells.

Central Coast Water Board staff agree that direct sampling of groundwater wells, including all drinking water wells is a critical aspect of the proposed order, especially to inform priorities and implementation of the order. Additionally, Central Coast Water Board staff agrees that domestic well owners and users must be properly informed, if drinking water wells exceed the MCL. However, it is important to recognize that relying on Regional Boards to conduct and verify such notification in a timely manner result in significant workload and associated cost. While Central Coast Water Board staff agrees that drinking water notification is critical, we suggest monitoring of domestic drinking water wells and public health notifications may be more effectively implemented by local county environmental health agencies. As this is not yet the case for local county environmental health agencies, the final order should emphasize the importance of

notifying well users of unsafe drinking water, and require growers and landowners enrolled in ILRP orders to notify well users. However, we recommend that associated follow-up be conducted by the Division of Drinking Water (DDW), in coordination with county environmental health officers. In addition, we also recommend that for all other drinking water wells, DDW or county environmental health will notify the users promptly. Effective coordination between the Regional Board and local county environmental health agencies can be managed using a statewide groundwater data management system (e.g. GeoTracker)

Vulnerability Distinctions

We note the Expert Panel's recommendation that nitrogen applied and removed, and nitrogen management should be reported by all growers, not just those in high vulnerability areas. We also note that the proposed order reflects this recommendation.

The Central Coast Water Board's ILRP order utilizes a three tier structure based on risk, where ranches assigned lower tiers have a lower regulatory burden, relative to higher tiers.

The ability to develop and implement ILRP order requirements based on threat to water quality is an important tool for Central Coast Water Board staff. Some agricultural operations pose a greater threat to water quality than others. Central Coast Water Board staff needs the flexibility to align threat with regulatory requirements; doing so potentially gives regulatory relief to lower threat operations and triggers increased requirements when the threat to water quality warrants it. This structure also incentivizes farm management decision-making that decreases risk to water quality.

Recommendation: consider developing order requirements that strike a balance between doing away with requirements based on risk (or vulnerability) altogether, and allowing Regional Boards to develop requirements based on risk. One scenario might be to require all growers to initially report the nitrogen information, with higher frequency reporting required of those with higher risk.

Total Nitrogen Applied and A/R Ratio

The Central Coast Water Board's ILRP order requires growers with a high risk of loading nitrogen to groundwater to annually report total nitrogen applied by specific crop. We currently have two years of data reported. We consider this a key requirement in our ILRP order needed to address and evaluate nitrogen loading to aquifers, many of which are already exceeding drinking water quality objectives. Total nitrogen applied (TNA) data is reported directly to Central Coast Water board staff by growers in an electronic format conducive for staff uploading to a database file. This provides a means for us to analyze the large dataset, formulate conclusions regarding progress towards meeting water quality objectives, and prioritize follow-up with individual growers, where appropriate. Central Coast Water Board staff is able to manage the volume of data reported directly from growers.

We object to any order or requirement that would hinder our ability to collect TNA data directly from growers, even for a limited period of time. One alternative of the proposed order requires Central Valley growers to report nitrogen applied data to the coalition, which is held until 2019 when it is ultimately forwarded to the Central Valley Water Board. Again, the Central Coast Water Board has been collecting TNA data for two years and growers are required to submit again by October 1, 2016; it would be a step backwards for us to have a third party hold this information while research is conducted on nitrogen applied and removal rates.

As stated above, we recommend that the final order not set a precedent for other Regional Board's ILRP orders, but rather simply memorializes minimum requirements necessary to comply with applicable policy and court decisions. In the event that precedent is warranted and described in the final order, we support nitrogen applied data reporting in the Central Coast Region but strongly recommend that we retain the flexibility to collect nitrogen applied data from areas and growers we conclude pose a threat to water quality, and without this information first being reported to a third party; no interruption in TNA reporting in the Central Coast Region should occur. We also recommend that the Central Coast Region retain the flexibility to collect this information in a format we deem necessary for our data management and evaluation requirements.

With respect to A/R ratio reporting, TNA is a component of the ratio, as is nitrogen removed. We support reporting of each component (nitrogen applied and nitrogen removed), as well as the ratio, notwithstanding our recommendation for continued reporting directly to the Central Coast Water Board as an option and our continued discretion to require the data where and when warranted, i.e., where a threat to water quality exists. The A/R ratio can serve as a proxy for potential loading to groundwater. As a proxy, we recommend some level of field sampling below the root zone in the Central Coast Region to confirm progress toward meeting our water quality objectives.

We support the development of A/R targets in the Central Coast Region as a performance metric. The targets should be developed locally using an approach reflecting current knowledge and local farming conditions. There is an underlying assumption in the proposed order that developing A/R targets over a three-year period will inherently result in targets that maximize nitrogen management efficiency. The Central Coast Water Board staff does not support the approach where targets are developed using median nitrogen application and removal rates over a three-year period, unless we could confirm that those applications and removal rates represent maximum nutrient management efficiency and account for flexibility, where needed. We recommend that the Central Coast Water Board staff retain the discretion to develop A/R targets based on local commodities and farming conditions.

Irrigation and Nitrogen Management Plan (INMP) and INMP Summary Report

We support INMP, INMP Summary Reporting and their certification in the Central Coast Region. However, similar to total nitrogen and A/R reporting, we recommend that flexibility be retained in the final order, allowing regions to invoke the reporting requirement where they conclude a threat to water quality exists and to not require the reporting where there is little or no threat.

We recommend that the Central Coast Water Board retain the discretion to collect INMP and INMP Summary Report information directly from the grower or through a third party, as we deem appropriate for the given situation, based on threat to water quality. We also recommend that the order allow the Central Coast Water Board to retain the discretion to develop the required INMP and INMP Summary Report content and format; doing so will ensure higher quality data consistency and input as well as conform with our filing system and data access needs.

Management Practice Evaluation Program

Central Coast Water Board staff question whether the stated goal of the Management Practice Evaluation Program is achievable, and can feasibly be implemented in the Central Coast Region.

Ms. Townsend

May 31, 2016

If you have any questions regarding these comments, please contact Water Board Staff Counsel Jessica Jahr by phone at (916) 341-5168 or by email at Jessica.Jahr@waterboards.ca.gov , or Irrigated Lands Regulatory Program Manger by phone at (805) 542-4770 or by email at Chris.Rose@waterboards.ca.gov .

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