



September 3, 2013

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Subject: Comments to A-2209(a)-(e) - September 10, 2013, Board Meeting

Dear Ms. Townsend:

The Central Coast Groundwater Coalition (CCGC) appreciates the opportunity to comment on the State Water Resources Control Board's (State Board) revised draft order *In the Matter of Review of Conditional Waiver of Waste Discharge Requirements Order No. R3-2012-0011 for Discharges from Irrigated Lands* (Revised Draft Order). The CCGC is a recently formed organization whose primary purpose is to administer a cooperative groundwater monitoring program in compliance with the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands and Monitoring and Reporting Program Order Nos. R3-2012-0011-01, R3-2012-0011-02, and R3-2012-0011-03 (hereafter, "Conditional Waiver" and "Tier 1 MRP," "Tier 2 MRP," and "Tier 3 MRP," respectively).

Specifically, all three MRPs include a provision that allows for a cooperative groundwater program in lieu of conducting individual groundwater monitoring. (See, e.g., Tier 1 MRP, p. 9-10.) The CCGC has developed such a program that is consistent with this provision, and that has recently been approved by the Executive Officer of the Central Coast Water Quality Control Board (Central Coast Water Board). CCGC agrees and supports the portions of the Revised Draft Order that clearly state that "the recently approved cooperative groundwater plans are not properly before us at this time as they reflect actions taken after adoption of the Agricultural Order that are not part of the Administrative Record." (Revised Draft Order, pp. 5-6.) However, because the Revised Draft Order does include proposed changes to Provision 6 of the MRPs (the cooperative groundwater monitoring provision), the CCGC finds it necessary to provide these specific comments.

#### **I. Requirement to Sample All Domestic Wells**

Contrary to Provision 6 of the MRPs, the Revised Draft Order would require sampling of all domestic drinking water wells "to the same extent these wells are required to be sampled under the individual groundwater monitoring revisions." (Revised Draft Order, pp. 30-31.) The CCGC does not support the proposed revision because where there is a cooperative program like that developed by the CCGC it is not necessary to require sampling of every domestic supply well to evaluate drinking water quality. Rather than sampling every domestic supply well, the CCGC has put forward, and the Central

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Coast Water Board has approved, a program that evaluates the quality of drinking water through the use of commonly known groundwater evaluation methods such as kriging to evaluate larger areas with existing data, or that includes the collection of some additional data where there are identified data gaps.

Specifically, the Revised Draft Order would require monitoring of every domestic supply well on every CCGC member's property, and that initial sampling must include two sampling rounds (one in the spring and one in the fall). The Revised Draft Order argues that such monitoring is necessary because of the significant concerns with drinking water safety. (Revised Draft Order, p. 31.) However, the Revised Draft Order does not provide any support to suggest that other methods of evaluation are not sufficient to achieve the same purpose.

With respect to the primary purpose of identifying domestic drinking water wells that may be exceeding the drinking water standard for nitrate (i.e., the primary maximum contaminant level (MCL) of 45 mg/L as NO<sub>3</sub>, or 10 mg/L as N), the Conditional Waiver was written with the understanding that the individual growers would sample and report water quality for their domestic wells on their property. Or, as an alternative to individual sampling of wells, a cooperative groundwater monitoring program could be established that, at a minimum, "must include sufficient monitoring to adequately characterize the groundwater aquifer(s) in the local area of the participating Dischargers, characterize the groundwater quality of the uppermost aquifer, **and identify and evaluate groundwater used for domestic drinking water purposes.**" (Tier 1 MRP, p. 9; Tier 2 MRP, p. 9; Tier 3 MRP, p. 9 emphasis added.) There are two options for achieving the purpose of identifying and evaluating groundwater used for domestic drinking water: 1) sample every domestic supply well; or 2) sample a representative subgroup in a manner that guarantees that the CCGC can identify which wells in certain areas likely contain water with a concentration of nitrate above the MCL.

If only individual monitoring is occurring, the requirement for sampling every domestic supply well on every grower's property is the only way to guarantee that drinking water quality is characterized. This is because individual growers are unable to use data from other growers and are unlikely to use sophisticated analytical techniques to estimate the concentration of nitrate in shallow groundwater across the entire region. However, the same does not hold true for a cooperative program like the one developed by the CCGC. The benefit and advantage of a cooperative program is that it can combine data from several member properties (as well as data from non-member properties) and utilize analytical techniques such as kriging to characterize with a high level of certainty groundwater concentrations of nitrate across the region without sampling every well. Accordingly, where there is a cooperative program, not all wells need to be sampled to obtain the same degree of certainty about the concentration of nitrate in domestic supply wells.

Moreover, sampling every well is not only unnecessary but may also prove to be logistically impractical due to the large number of wells in certain areas. For example, the CCGC has retrieved and examined the available well logs for domestic wells in the Salinas Valley. Over 1,000 domestic well logs could be easily located by section (one square mile) (see Figure 1) for the northern Salinas Valley. (Approximately an additional 2,000 wells could not be easily located.) Figure 1 shows that in some sections there are potentially more than a dozen domestic wells. Sampling of this high number of wells within a square mile is unnecessary for the required characterization of drinking water supply.

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The CCGC also argues that adequate and useful characterization of the groundwater quality requires more than a mere collection of groundwater samples and determination of nitrate concentrations. A useful characterization will include determination of constituents that reveal information about sources of high nitrates and causality that will help the CCGC and Regional Board staff to identify and prioritize areas and individual farms that are at greater risk for pollutant loading. As described in its recently approved workplan, the CCGC proposes to collect samples and analyze for constituents that will provide this information. For example, such constituents include: 1) isotopes of nitrate which will help define sources of nitrate in wells and process affecting concentrations (such as reduction of nitrate); 2) indicators of the presence of wastewater; and 3) hydrogen and helium isotopes and noble gases that will provide information about the age of the groundwater.

Although the approval of the CCGC program is not before the State Board, it is important and relevant for the State Board to know what the CCGC's program includes to better understand that sampling of all domestic supply wells of those participating in the cooperative program is not necessary to achieve the Revised Draft Order's intended purpose and to protect public health. First, the work plan developed by the CCGC provides a monitoring program that will ensure that wells with a concentration of nitrate above the MCL will be identified within a reasonable level of certainty. The sources of uncertainty include:

- Unknown well construction and uncertainty about the depths of well screens and therefore the depth in the aquifer where the well collects water;
- The total depth of the well;
- Sparse coverage of wells ; and
- Highly spatially variable concentrations within a region or subregion.

Recognizing that these sources of uncertainty exist in the identification of wells with elevated nitrate, the CCGC work plan provides several ways to minimize the uncertainty as follows.

1. The CCGC will provide three (3) separate lists of wells to sample in the CCGC region. Each list will include wells representative of the three geographic regions addressed in the CCGC work plan: Salinas/Lockwood Valleys, Gilroy-Hollister region, and Pajaro Valley.
  - a. The first list is based on an initial review of domestic supply well availability, well logs from DWR, and locations of CCGC member parcels. The Central Coast Water Board will review the list and provide input on the list.
  - b. A second list will be submitted 30 days later that includes the wells on the initial list plus additional wells as necessary to provide sufficient geographic coverage to construct contours. We will use geo-statistical methods (e.g., kriging) to estimate the level of uncertainty associated with contours that encompass areas with a specified range of concentrations and collect sufficient numbers of samples in each area to minimize uncertainty. Figure 2 shows an example contour map based on existing data. The contour map allows the viewer to click on a location and obtain an estimate for the concentration

of nitrate in the groundwater at that point. The third and final list is a supplemental list developed after reviewing water quality data from the domestic supply wells.

- c. The supplemental list is meant to address data gaps and increase the certainty in the contours that delineate wells above the MCL from those below the MCL. The Central Coast Water Board will have the opportunity to require additional sampling of wells as necessary. Also, the Executive Officer indicated that if the CCGC needs to sample a domestic supply well not on a member parcel inside an agricultural region where improved characterization is necessary, the Central Coast Water Board will facilitate obtaining permission from the well owner for the CCGC to sample that well. It is important to note that the CCGC is willing to sample wells from non-members to obtain the maximum possible certainty in the contours that is necessary to characterize the concentration of nitrate in any region.
  - d. Finally, the default for the CCGC is to sample every well. If the CCGC proposes to sample fewer wells, it will provide a justification to the Central Coast Water Board explaining how the domestic supply wells proposed for sampling will characterize nitrate concentrations for the entire region. This justification will be based on 1) previous characterization of the groundwater quality<sup>1</sup>, 2) land use, and 3) hydrogeology.
2. Additional samples will be collected to measure the concentration of nitrate in wells with unknown screening depths. Domestic supply wells with no well construction information cannot be placed with certainty into the contours developed for shallow groundwater because the screening depth is unknown. Consequently, for those wells where some uncertainty exists, samples will be collected and analyzed so that at whatever depth the well is screened, the concentration of nitrate will be known.
  3. Additional samples may be collected if the concentrations of nitrate are slightly below the MCL. If a sample is collected in which the concentration of nitrate is slightly below the MCL, that well will be targeted for a second sample to be collected during a different season (e.g., spring, if fall sampling initially). The primary concern is a well that varies slightly seasonally in the concentration of nitrate and at some point in time during the year would provide domestic supply water with a concentration of nitrate above the MCL. The CCGC will work with the Central Coast Water Board to identify wells that need to be sampled a second time to confirm that the concentration of nitrate is safely below the MCL.

The CCGC believes that the approach described above is superior to that proposed in the Revised Draft Order because it would include sampling of both member and non-member wells to provide more certainty with respect to characterizing groundwater used for domestic drinking water purposes. In comparison, the Revised Draft Order requirement to monitor all member wells may or may not include sufficient information to characterize drinking water supplies in certain areas. Further, it

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<sup>1</sup> In cooperation with the Central Coast Regional Board and under the auspices of the Central Coast Ambient Monitoring Program (CCAMP) Groundwater Assessment and Protection (GAP) Program, the US Geological Survey is sampling domestic wells. In 2013, about 200 wells were sampled in the Pajaro and Salinas valleys. We intend to include these data in our characterization and analysis of groundwater quality.

prevents the CCGC from allocating its resources in an efficient manner to characterize groundwater as explained in paragraphs 1 through 3 above.

## **II. Requirement to Conduct Spring and Fall Sampling**

Next, the CCGC is concerned with the Revised Draft Order's change to require initial sampling in both the spring and fall. Specifically, the requirement for sampling every CCGC member well twice is unnecessary because it will provide little additional information for assessing the concentration of nitrate in the well, or characterizing the shallow aquifer. If the concentration of nitrate is well above the MCL, even if the concentration dropped below the MCL during a different season, the well is still considered contaminated. If the second sample indicates that the well is still well above the MCL, the second sample provides no additional information. It is not expected that a situation would occur where there is a very low nitrate concentration in the first sampling event and a high concentration (above the MCL) in a second event later in the year. The available data for the northern Central Coast region demonstrate long-term increases or relatively stable nitrate concentrations in wells. If the nitrate concentration in the first sample is well below the MCL, an additional sample is highly unlikely to result in a concentration of nitrate above the MCL and the results of the second sample will provide little additional information. Only those domestic supply wells with a concentration of nitrate near the MCL would benefit from a second sampling event to increase the certainty about the concentration; the CCGC addresses this in their approved work plan (see #3 above). Thus, sampling of every well in both the spring and fall even initially is not warranted.

## **III. Revised Draft Order Undermines Viability and Value of a Cooperative Program**

The State Board must also recognize that by requiring a cooperative program to sample all domestic wells, and to sample all such wells twice initially, the viability of a cooperative program decreases dramatically. Mostly, such requirements will increase the cost of the cooperative program to such a level that there will no longer be a financial incentive for growers to join such a program. Without a cooperative program like that put forward by the CCGC, the Central Coast Water Board and the State Board will be unlikely to obtain valuable information that actually characterizes the shallow aquifer in a meaningful manner.

Individual reporting cannot be collective in either reporting or assessment. The CCGC provides to the Central Coast Water Board an additional level of assessment that can be used to inform the monitoring and reporting requirements in the regulatory program that will follow the current Conditional Waiver. In addition, the CCGC can provide data to the Central Coast Water Board that will be collected under an approved Quality Assurance Project Plan including documentation of laboratory, sampling and data management standard operating procedures to ensure both accuracy and precision of all submitted data. The CCGC can also provide characterization of the drinking water supply that provides information about causes and sources of degradation that individual sampling cannot provide. With little or no enrollment, the CCGC will be unable to adequately characterize the shallow aquifer and that characterization will be left to the Central Coast Water Board staff to perform with individual data sets that are subject to both sampling and reporting errors. If only individual reporting occurs due to a lack of enrollment in the CCGC, significant resources on the part of the Central Coast Water Board will

be incurred to be able to analyze individual reports, assess them for precision and accuracy and attempt to characterize the shallow aquifer.

#### **IV. Cooperative Program Should Be Allowed to Put Forward Appropriate Notification Program**

Next, the Revised Draft Order proposes to include extensive notification requirements when a well that is used for drinking water exceeds any Primary or Secondary MCL.<sup>2</sup> While the CCGC agrees that users of wells must be notified when their drinking water exceeds the nitrate drinking water standard, which is the constituent of concern here, the CCGC does not agree with the inclusion and timing requirements for notification of exceedances related to other primary and secondary MCLs. First, the only primary MCL constituent for which monitoring is being required is nitrate. Accordingly, it seems appropriate to limit notification to nitrate. Second, secondary MCLs are consumer taste and odor standards - not public health standards. As such, exceedances of secondary MCLs do not trigger public health concerns. Further, and as is discussed in the comments submitted by Grower-Shipper, the CCGC understands that the notification required here is not consistent with similar requirements imposed on public water agencies subject to the California Department of Public Health's regulations. Accordingly, the CCGC encourages the State Board to only include notification requirements for exceedances of the nitrate drinking water standard.

Moreover, the Revised Draft Order should provide cooperative programs with some additional flexibility for developing and implementing notification and outreach to those affected. Specifically, the Revised Draft Order states, "We direct the Central Coast Water Board to work with the State Water Board to develop and make available English and Spanish language templates for notification consistent with new Section A.7 of Part 2 of the Tier 1, 2 and 3 MRPs." The CCGC is looking for this language to be modified to allow the CCGC, and cooperative programs in general, to work with appropriate entities to develop appropriate notification materials and to conduct the necessary outreach that should accompany notification. For example, CCGC representatives have been in contact with local community groups that work directly with farm workers in the area. As part of those discussions, the CCGC is looking to develop outreach/notification materials that are effective in informing individuals of the public health concerns associated with drinking water that exceeds nitrate levels. The CCGC is also planning to work directly with its grower members to assist them in such notifications where necessary due to elevated levels of nitrate.

To that end, we request that the Revised Draft Order be revised as follows: "We direct the Central Coast Water Board to work with the State Water Board to develop and make available English and Spanish language templates for notification consistent with new Section A.7 of Part 2 of the Tier 1, 2, and 3 MRPs *that may be used by individuals or a cooperative groundwater program; or, as an alternative, a third party conducting a cooperative groundwater monitoring program may develop notification/outreach materials in coordination and in consultation with others. In the event that a third party conducting a cooperative groundwater monitoring program chooses to develop its own materials, such materials must be approved by the Central Coast Water Board's Executive Officer.*"

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<sup>2</sup> The CCGC believes it important to note that the Central Coast Water Board staff will have access to all CCGC data as soon as it is uploaded into GeoTracker, which must be done within a specified time frame after the CCGC receives and verifies laboratory results.

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In conclusion, the CCGC requests that the State Board change the Revised Draft Order to eliminate the proposed amendments to Section A.6 of Part 2 of the Tier 1, 2, and 3 MRPs. The CCGC further requests that the newly proposed Section A.7 of Part 2 of the Tier 1, 2, and 3 MRPs be revised to require notification for exceedances of the nitrate drinking water standard but that references to all primary MCLs and secondary MCLs be deleted. Further, the CCGC requests that the State Board's direction with respect to template development be revised to allow third party cooperative programs to develop appropriate notification and outreach materials. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Klassen', with a long horizontal flourish extending to the right.

Parry Klassen

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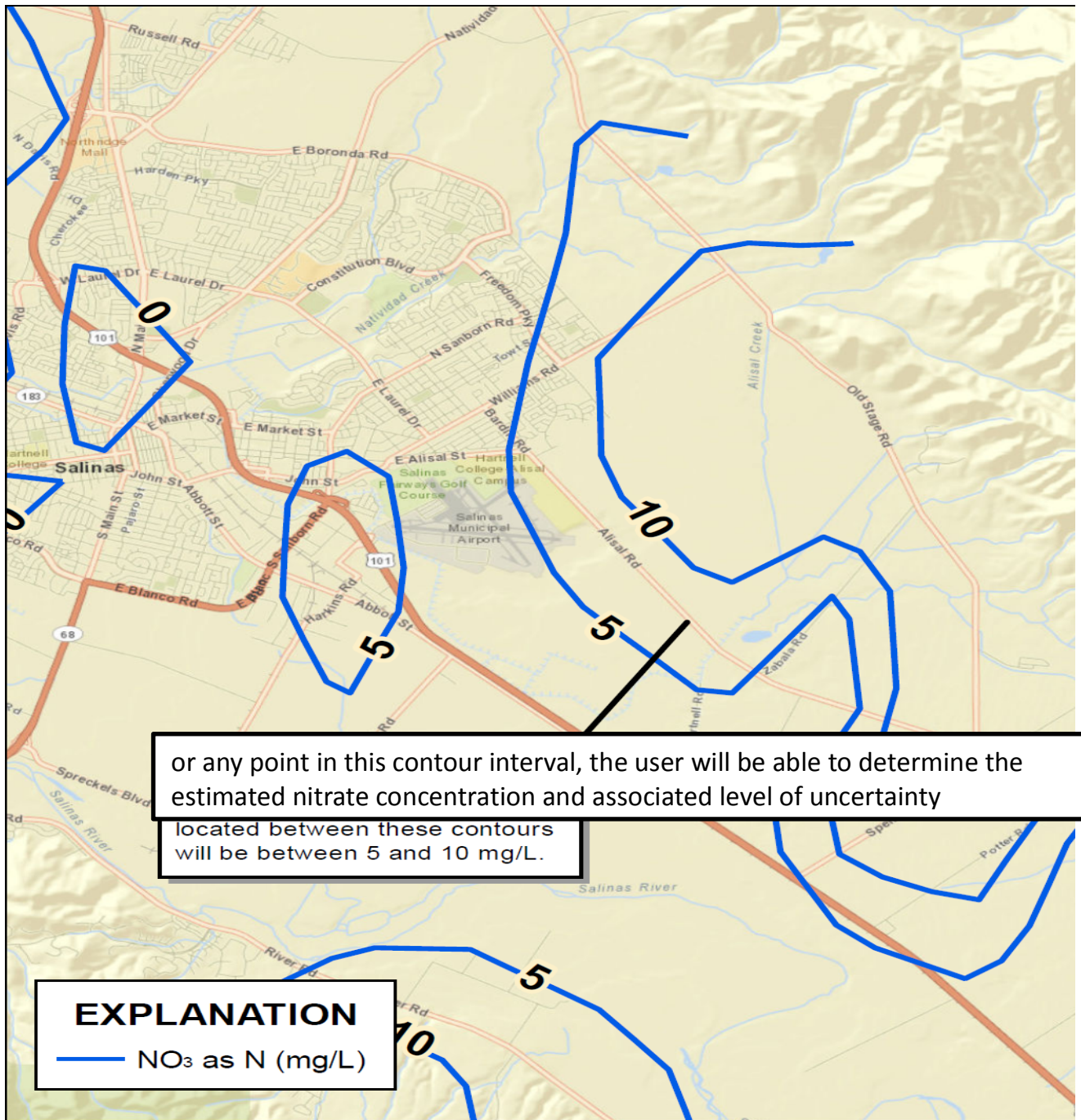


Figure 2. Example contour map constructed using existing data for groundwater nitrate concentrations the Salinas Valley. The CCGC envisions that an end user of the data would be able to click on specific locations on a contour map. Groundwater nitrate concentration estimates for specific locations and associated uncertainty would be displayed.

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