



November 7, 2014

Ms. Pamela Creedon, Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670

Dear Ms. Creedon:

The East San Joaquin Water Quality Coalition (ESJWQC, or Coalition) submitted its required Groundwater Quality Assessment (GAR) on January 13, 2014. On June 4, 2014, the Regional Water Quality Control Board (RWQCB) provided a letter of conditional approval of the ESJWQC GAR and an accompanying staff comment letter (June 3) (see **Attachment A** for letters). The conditional approval letter dated June 4 specified that the Coalition must address the following items prior to issuance of the Executive Officer's final approval of the GAR.

1. Include map(s) that show the location of small disadvantaged communities reliant on groundwater through domestic well use or small water systems, where such information is available or can be inferred from existing information.
2. Revise the priorities within high vulnerability areas to ensure small disadvantaged communities reliant on groundwater are the highest priority for implementation of management plans.
3. Include map(s) that show the locations of wells with nitrate concentrations between 5 and 10 mg/L.
4. Include a discussion and rationale for excluding from the proposed East San Joaquin Water Quality Coalition High Vulnerability Area (ESJHVA) all wells with the observed nitrate concentration above 5 mg/L and below 10 mg/L, or include such wells in the methodology for designating the ESJHVA.

The following additional items were also noted in the letter of conditional approval:

- Compliance dates associated with the conditional approval (Table 1 in the June 4 letter).
- Inclusion of remaining items identified in the staff review in applicable workplans or in the 2019 GAR update (Table 2 in the June 4 letter).
- Signature and seal under the California Business and Professions Code §7835/§6735(a).

The RWQCB's letter of conditional approval stated that the ESJWQC must submit a revised GAR or Addendum by August 11, 2014 to address the above items. On July 23, 2014, the ESJWQC coordinated a meeting held with RWQCB staff and other agricultural coalition representatives to discuss comments received on the ESJWQC GAR. Shortly thereafter, on August 4 the ESJWQC requested a 90-day extension because the Coalition was unable to initiate revisions to the GAR until clarification of the requirements outlined in the approval letter was



provide by the RWQCB at the July 23 meeting. The extension was also requested to allow the ESJWQC sufficient time to complete any necessary analyses, reprioritization of high vulnerability areas, and coordination of the development of a Groundwater Quality Management Plan (GQMP) in light of the reprioritized areas.

### **Responses to Comments and GAR Addendum**

The table in **Attachment B** outlines the items in the RWQCB conditional approval letter and staff comments letter and how each has been or will be addressed. As indicated in the table, an Addendum (**Attachment C**) has been prepared to specifically address the RWQCB's requirements noted in the June 4, 2014 letter of conditional approval. Additionally, one other item noted in the RWQCB staff review (June 3 letter, Item 9.B.), which requests results from statistical analyses relating to land use control variables used in the East San Joaquin Hydrogeologic High Vulnerability Area (HHVA) modeling, is also addressed in the Addendum. The remaining items identified in the staff review (June 3 letter) are addressed within the table.

We would be pleased to meet with you to discuss any questions that you or your staff may have concerning our responses to comments on the GAR as shown in the table and/or Addendum.

Sincerely,

Parry Klassen  
Executive Director

Cc: Joe Karkoski, CVRWQCB  
Susan Fregien, CVRWQCB  
Vicki Kretsinger, LSCE  
Nick Watterson, LSCE  
Michael Johnson, MLJ-LLC

Attachment A: RWQCB Letters from June 3 and June 4, 2014

Attachment B: Table of Responses to Comments

Attachment C: GAR Addendum