
Central Coast Regional Water Quality Control Board

December 7, 2017

Via Electronic Mail Only

Ms. Jennifer Marr
Statewide Infrastructure Investigations Branch
Division of Statewide Integrated Water Management
California Department of Water Resources
Jennifer.Marr@water.ca.gov

Dear Ms. Marr:

**CENTRAL COAST REGIONAL WATER QUALITY CONTROL BOARD COMMENTS
REGARDING DISCUSSION DRAFT WHITE PAPER FLOOD-MAR: USING FLOOD WATER
FOR MANAGED AQUIFER RECHARGE TO SUPPORT SUSTAINABLE WATER
RESOURCES**

The Central Coast Water Board appreciates the opportunity to comment on the subject discussion draft white paper. In general, we are in support of projects that will increase recharge of groundwater aquifers in the central coast region. We recognize the multiple benefits associated with actively recharging aquifers to flood risk reduction, drought preparedness, environmental enhancement, climate change, and many other public benefits.

However, we are concerned about potential water-quality effects that the proposed projects may have if implemented on active agricultural lands, fallowed fields, and fallow lands in rotation.

Specifically, ag irrigation return flows and stormwater runoff moving across agricultural fields could carry dissolved pollutants such as nitrogen from fertilizers and pesticides applied to cropland, which could then move through the vadose zone into aquifers. Therefore, we recommend a thorough investigation of the potential water-quality effects of these types of projects to determine the potential to degrade underlying groundwater. If the potential for degradation is significant, the study should evaluate using treatment practices to decrease pollutants to acceptable levels and limiting recharge on ag land unless the land has been permanently retired.

Thank you again for the opportunity to comment. If you have any questions, please contact Monica Barricarte at (805) 549-3881 or Monica.barricarte@waterboards.ca.gov or Harvey Packard at (805) 542-4639 or Harvey.packard@waterboards.ca.gov.

Sincerely,

for John M. Robertson
Executive Officer

cc: Kamyar Guivetchi
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