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JARED BLUMENFELD
SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Coast Regional Water Quality Control Board

June 30, 2021

Paul Sciuto, General Manager
Monterey One Water
paul@my1water.org

Via email only

Brent Buche, General Manager
Monterey County Water Resources Agency
bucheb@co.monterey.ca.us

Dear Mr. Sciuto and Mr. Buche:

USE OF BLANCO DRAIN WATERS FOR TREATMENT AND REUSE AS PART OF PURE WATER MONTEREY PROJECT

Monterey One Water (M1W), in cooperation with Monterey County Water Resources Agency (MCWRA) pursuant to a water recycling agreement,¹ has constructed and is operating the Pure Water Monterey project, which was designed to treat water from various sources and provide recycled water to irrigate Salinas Valley cropland and recharge the Seaside groundwater basin.

One of the sources being utilized is water from the Blanco Drain. Per Water Right Permit 21376 issued by the State Water Resources Control Board, the project is allowed to divert all dry weather flows from the Blanco Drain, exclusive of any dry weather flows required to be bypassed, up to six cubic feet per second (cfs) and 3,000 acre-feet per year.² The point of diversion is within the Blanco Drain just upstream of its confluence with the Salinas River. At the diversion point, Blanco Drain dry weather and wet weather flows contain high concentrations of various pollutants, including nutrients, pesticides and herbicides, and sediment. These pollutants are removed from the lower Blanco Drain and prevented from entering the Salinas River during the implementation of complete dry weather flow diversions. The Blanco Drain is subject to water quality limits for nutrients and pesticides/toxicity associated with the Lower Salinas River Watershed Total Maximum Daily Loads (TMDLs) as well as other non-TMDL water quality parameters, such as turbidity, specified in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan). The Central Coast Water Board's recently adopted agricultural order³ (Ag Order 4.0) implements these Basin Plan water quality limits.

¹ November 3, 2015, Amended and Restated Water Recycling Agreement Between Monterey Regional Water Pollution Control Agency and Monterey County Water Resources Agency (Note: Monterey One Water was formerly known as the Monterey Regional Water Pollution Control Agency).

² The water right requires that M1W maintain certain minimum flows from Blanco Drain into the Salinas River during drought conditions, as specified.

³ General Waste Discharge Requirements for Discharges from Irrigated Lands, Order No. R3-2021-0040; https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ag_waivers/regulatory_information.html

Section 16.15 of the water recycling agreement includes the following condition precedent for new source water facilities, and this letter is in response to this condition precedent:

3. *Written findings are made by the Regional Water Quality Control Board that utilization of the Blanco Drain dry weather flows as a New Source Water meets all treatment requirements for the aforesaid dry weather flows(.)*

Although Central Coast Water Board staff supports the Pure Water Monterey project and associated Blanco Drain diversion because of its multiple water supply and water quality benefits, we cannot make the condition precedent finding at this time because it would conflict with the requirements and associated processes contained in Ag Order 4.0.

Ag Order 4.0 includes a third-party process, in lieu of the individual discharger compliance option, by which a compliance pathway consistent with the condition precedent may be developed and approved. Monitoring and reporting requirements in Ag Order 4.0 paragraphs 18 and 19 of Part 2, Section C.3. Surface Water Protection, describe a third-party program process to develop and implement surface receiving water monitoring and reporting work plans and follow-up surface receiving water implementation work plans on behalf of participating dischargers to comply with water quality requirements, including those specified in Ag Order 4.0 for the Blanco Drain to implement the Basin Plan TMDLs and non-TMDL water quality limits. Ag Order 4.0 identifies the Blanco Drain as a third-party program surface water medium priority area subject to a follow-up surface receiving water implementation work plan March 1, 2026 due date. The follow-up surface receiving water implementation work plan along with the supporting surface receiving water monitoring and reporting work plan are subject to Executive Officer review, and interested persons may seek discretionary review by the Central Coast Water Board of the Executive Officer's approval or denial of the work plans.

Please note the surface water monitoring and follow-up surface receiving water implementation work plans will also need to address wet weather flows and un-diverted dry weather flows.

We look forward to continuing to work with M1W, MCWRA, and the agricultural community to continue to make progress on resolving this long-standing water-quality problem.

If you have any questions, please contact Harvey Packard at (805) 235-8435 or Harvey.packard@waterboards.ca.gov.

Sincerely,

Matthew T. Keeling
Executive Officer

cc:

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