
Central Coast Regional Water Quality Control Board

July 2, 2021

Kevin Merrill,
President, Board of Directors
Central Coast Water Quality Preservation, Inc.
P.O. Box 2227
Watsonville, CA 95077

Sarah Lopez
Executive Director
Central Coast Water Quality Preservation, Inc.
P.O. Box 2227
Watsonville, CA 95077

APPROVAL OF CENTRAL COAST WATER QUALITY PRESERVATION, INC. AS A REGIONWIDE THIRD-PARTY PROGRAM ADMINISTRATOR FOR THE CENTRAL COAST REGIONAL WATER QUALITY BOARD, IRRIGATED LANDS PROGRAM

Dear Mr. Merrill and Ms. Lopez:

The Central Coast Regional Water Quality Control Board (Central Coast Water Board) acknowledges receipt of your timely response (received on June 22, 2021 at 3:25 pm) to our Request for Proposals (RFPs) issued on April 23, 2021 for potential third-party program administrators to provide compliance assistance for Agricultural Order No. R3-2021-0040 (Order).

Third-Party Program Administrator

Central Coast Water Board staff finds that Central Coast Water Quality Preservation, Inc. (Preservation, Inc.) has met the minimum criteria outlined in the RFP and demonstrated their administrative and technical capacity to be a regionwide third-party program administrator with appropriate compliance assistance scope and scale. The proposal submitted by Preservation, Inc. was the only one received and it was evaluated and ranked based on the following criteria and weighting as reflected in the Evaluation and Rating Criteria table below.

Evaluation and Rating Criteria

Criteria	Relative Weight	Preservation, Inc. Score
Responsiveness to RFP – organization and content of proposal.	0.5	0.5
Meets Minimum Criteria – outlined in Attachment 1 of the RFP.	3.0	3.0
Program Overview and Approach – sufficient scope and scale.	3.0	3.0
Experience, Organization, and Qualifications of Proposed Team – sufficient experience, qualifications, and organizational structure.	3.0	3.0
Schedule and Readiness to Proceed – sufficient sequence and timing for implementation and specific planning.	0.5	0.5

The Central Coast Water Board Executive Officer approves Preservation, Inc. as a regionwide third-party program administrator that will assist participating member Dischargers in complying with the Order and Monitoring and Reporting Program (MRP) requirements. This approval relates **solely** to the designation of Preservation, Inc. as an approved third-party program administrator. There will be a subsequent third-party program work plan submittal and review process.

Reduced State Board Permit Fees

Preservation, Inc. is approved as a “group” (as defined by the Central Coast Water Board) to collect State Water Resources Control Board annual permit fees and offer the associated reduction in annual permit fees to their members. This approval is based on our evaluation of several factors, including the number of participating members, geographical extent of the third-party program, and proposed actions/scope to assist their members in achieving compliance with the Order (e.g., monitoring, data management and reporting, education and outreach, management practice implementation, management practice effectiveness determination). Additional guidance will be provided by Central Coast Water Board staff in support of Preservation, Inc. collecting annual permit fees from their members and transmitting the annual permit fees to the State Water Resources Control Board.

Groundwater Third-Party Program

Preservation, Inc. is approved to administer a regionwide Groundwater Third-Party Program to assist their members in complying with groundwater protection requirements in the Order, Part 2, Section C.1, Groundwater Protection and the MRP, Section C, Groundwater Monitoring and Reporting.

Third-Party Alternative Compliance Pathway Program for Groundwater Protection

Preservation, Inc. is approved to administer a regionwide Third-Party Alternative Compliance Pathway Program for Groundwater (Third-Party ACP) to assist their members in complying with the third-party alternative compliance pathway requirements in the Order, Part 2, Section C.2, Third-Party Alternative Compliance Pathway for Groundwater Protection and the MRP, Section D, Third-Party Alternative Compliance Pathway for Groundwater Protection.

Surface Water Third-Party Program

Preservation, Inc. is approved to administer a regionwide Surface Water Third-Party Program to assist their members in complying with surface water protection requirements in the Order, Part 2, Section C.3, Surface Water Protection and the MRP, Section E, Surface Water Monitoring and Reporting.

Partnerships

Preservation, Inc. has indicated they intend to partner with entities, when and if appropriate, to better serve the needs of their members in their efforts to comply with the Order and MRP. In particular, the submitted proposal includes proposed partnerships with the Central Coast Vineyard Team (Sustainability in Practice [SIP] Certification program), Central Coast Wetlands Group, and Creeklands Conservation. Additional partnerships and sub-partnerships are anticipated along with coordination with various entities (e.g., Resource Conservation Districts, University of California Cooperative Extension, Natural Resources Conservation Service, NGOs, etc.).

Work Plans

This approval letter does **not** address the programmatic level proposals associated with the various specific compliance assistance programs that Preservation, Inc. has included in their response to the RFP for potential third-party program administrators. These programmatic level proposals are beyond the scope of this initial third-party program administrator approval process. The submittal and review of Preservation, Inc.'s third-party compliance assistance program work plan or work plans will be subject to a subsequent process in accordance with the requirements outlined in the Order and MRP. Additional guidance will be provided by Central Coast Water Board staff in support of the third-party program work plan submittal process.

We look forward to working with Preservation, Inc. and their partners and collaborators in their new and expanded role to assist their members in complying with the Order and MRP requirements and to protect and restore beneficial uses and achieve water quality objectives for commercial irrigated agricultural areas in the central coast region. If you have any questions please contact Paula Richter at Paula.Richter@waterboards.ca.gov

or (805) 549-3865 or Jamie Pratt at Jamie.Pratt@waterboards.ca.gov or (805) 549-3761.

Sincerely,

Matthew T. Keeling
Executive Officer