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## California Regional Water Quality Control Board, Central Coast Region

December 15, 2025

Sarah Lopez  
Executive Director  
P.O. Box 2227  
Watsonville, CA 95077  
Email: [sarah@ccwqp.org](mailto:sarah@ccwqp.org)

**VIA ELECTRONIC MAIL ONLY**

Dear Sarah Lopez:

### **APPROVAL OF THE THIRD-PARTY PROGRAM SURFACE RECEIVING WATER MONITORING AND REPORTING WORK PLAN FOR SURFACE RECEIVING WATER QUALITY TRENDS**

On July 1, 2022, the Central Coast Regional Water Quality Control Board (Central Coast Water Board) received a submittal of the Surface Receiving Water Monitoring and Reporting work plan and the accompanying Sampling Analysis Plan and Quality Assurance Project Plan for Surface Receiving Water Quality Trends (SWQ Trends Work Plan) from the approved regionwide third-party program administrator for the Irrigated Lands Program (ILP), Central Coast Water Quality Preservation, Inc. (Preservation, Inc.). ILP staff reviewed the Work Plan,<sup>1</sup> provided feedback and advised Preservation, Inc. the SWQ Trends Work Plan did not meet the minimum required elements set forth in the MRP.<sup>2</sup> Between July 1, 2022 and December 8, 2025, revised SWQ Trends Work Plans were submitted by Preservation, Inc. ILP staff reviewed, provided written feedback and participated in meetings to discuss the SWQ Trends Work Plan with Preservation, Inc. and their consultants. On December 8, 2025, the Central Coast Water Board received Preservation, Inc.'s most recent submittal of the SWQ Trends Work Plan.

Pursuant to General Waste Discharge Requirements for Discharges from Irrigated Lands Order No. R3-2021-0040 (Ag Order), Attachment A – Findings, and Attachment B - Monitoring and Reporting Program (MRP), collectively referred to as the

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<sup>1</sup> The California State Water Resources Control Board Quality Assurance/Quality Control office reviewed two versions of the Sampling Analysis Plan and Quality Assurance Project Plan.

<sup>2</sup> The minimum required elements for the surface receiving water work plan are set forth in the MRP at pages 23-24, paragraphs 6-10:  
[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/docs/ag\\_order4/2021/ao4\\_att\\_b.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/ag_order4/2021/ao4_att_b.pdf).

Ag Order,<sup>3</sup> an approved third-party representing Dischargers<sup>4</sup> must develop and submit a SWQ Trends Work Plan to quantitatively evaluate surface receiving water quality trends and quantitatively assess the impacts of agricultural discharges on surface receiving water quality over time. As an approved third-party administrator, Preservation, Inc. is authorized to represent Dischargers enrolled in the Ag Order who opt to comply with surface receiving water monitoring to evaluate surface receiving water quality trends and reporting via membership in an approved third party program.<sup>5</sup>

**The Central Coast Water Board Executive Officer hereby approves the SWQ Trends Work Plan dated December 8, 2025.**

Interested persons may request the SWQ Trends Work Plan by submitting a written request electronically to Paula Richter ([paula.richter@waterboards.ca.gov](mailto:paula.richter@waterboards.ca.gov)). Pursuant to the Ag Order, Part 2, section A, paragraphs 24 and 35, **interested persons may seek discretionary review** by the Central Coast Water Board of the Executive Officer's approval of the SWQ Trends Work Plan by submitting a written request electronically **no later than 30 days from the date of this letter** to the Executive Officer ([ryan.lodge@waterboards.ca.gov](mailto:ryan.lodge@waterboards.ca.gov)). Because any such review is discretionary, any person seeking such review may also elect to file a petition for review simultaneously with the State Water Resources Control Board (State Water Board) pursuant to California Water Code section 13320 and Title 23 Cal. Code Regs., section 2050 et seq.<sup>6</sup> Failure to file a simultaneous petition for review with the State Water Board may result in a waiver of additional rights to review by the State Water Board or a court.

Sincerely,

Ryan E Lodge  
Executive Officer

cc:

Angela Schroeter, [angela.schroeter@waterboards.ca.gov](mailto:angela.schroeter@waterboards.ca.gov)

Mary Hamilton, [mary.hamilton@waterboards.ca.gov](mailto:mary.hamilton@waterboards.ca.gov)

Elaine Sahl, [elaine.sahl@waterboards.ca.gov](mailto:elaine.sahl@waterboards.ca.gov)

Paula Richter, [paula.richter@waterboards.ca.gov](mailto:paula.richter@waterboards.ca.gov)

Sophie Froelich, [sophie.froelich@waterboards.ca.gov](mailto:sophie.froelich@waterboards.ca.gov)

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<sup>3</sup> Ag Order R3-2021-0040 and attachments:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/regulatory\\_information.html](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/regulatory_information.html)

<sup>4</sup> MRP, section E 1-12 requirements:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/docs/ag\\_order4/2021/ao4\\_att\\_b.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/ag_order4/2021/ao4_att_b.pdf)

<sup>5</sup> Approval of Preservation, Inc. as a third-party administrator, letter dated July 2, 2021:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/docs/third\\_party\\_prgm/ccwqp\\_3p\\_approval.pdf](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/third_party_prgm/ccwqp_3p_approval.pdf)

<sup>6</sup> Instructions for Filing Water Quality Petitions, State Water Resources Control Board:

[https://waterboards.ca.gov/public\\_notices/petitions/water\\_quality/wqpetition\\_instr.shtml](https://waterboards.ca.gov/public_notices/petitions/water_quality/wqpetition_instr.shtml)