



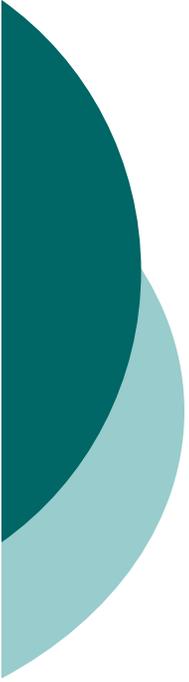
Concerns About East San Joaquin Water Quality Coalition Proposed WDR

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Overview

- Determination of Vulnerable Areas
- Groundwater Monitoring
- Farm Evaluation Plans
- Nutrient Management Plans
- Water Quality Criteria



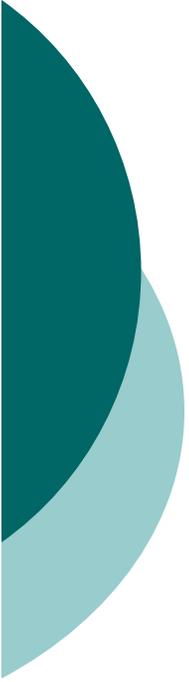
Current Mapping Vulnerable Groundwater Areas

- Need to redefine vulnerable areas
 - Using the DPR vulnerable areas incorrectly – As state in DPR comment
 - Constituent specific
 - Does not translate into Nitrate vulnerability
 - By using the current mapping technique many areas will be in vulnerable ground water area
 - require limited resources to be spent on unnecessary actions



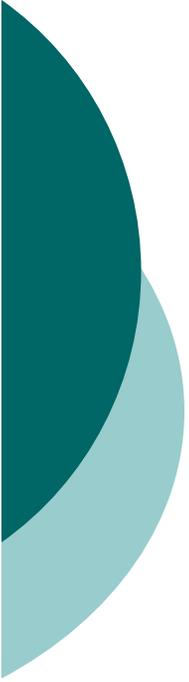
Groundwater Monitoring

- Monitoring of groundwater
 - Flawed assumption that what leaves the root zone will end up in groundwater
 - Many varying factors when monitoring groundwater
 - Gradients, time, dynamic soils and differing soil types (bacteria, organic matter, past practices)



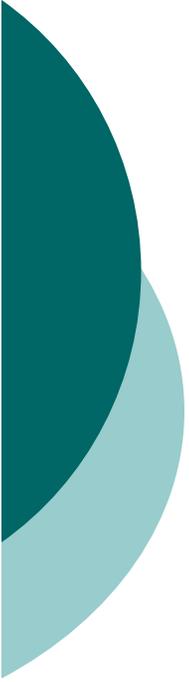
Groundwater Monitoring, cont.

- First encountered groundwater
 - In delta could be 2 feet down
 - Not drinking water yet first encountered
 - Depth depends on water levels in the river
 - Tidal influences



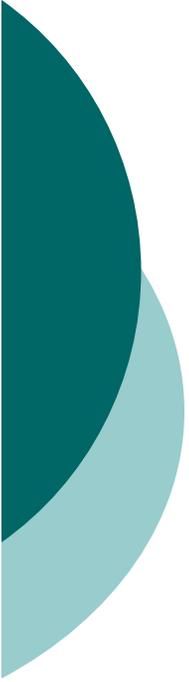
Farm Specific Evaluations

- All farms must submit –
 - Becomes a waste of resources in paperwork
 - Not all farms are contributing to water quality issues
 - All assumed guilty or potential to impact surface or groundwater
 - More efficient to let the Coalitions identify those areas that need to be addressed and use limited resources to implement practices to improve water quality
 - Becomes public information if submitted or requested
 - Electronic submittal of data to regional board



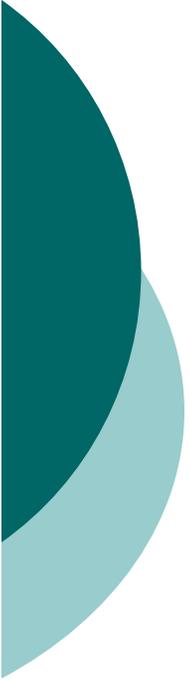
Nutrient Management Plans

- All farms in vulnerable area have to submit farm-specific nutrient management plans by Certified Crop Advisor
 - Expensive and unnecessary in many cases
 - Farmers have knowledge and training to make management decisions that will improve water quality
 - Submitting information twice a year – not useful and a paperwork nightmare
 - Education and Outreach works



Regional Board dictating farming practices

- The way the groundwater program is being developed the Regional Board will tell farmers which practices would be acceptable or not
 - Each operation is unique
 - Many variables in the farming of crops and effects on ground water
 - Rootstocks, soil, rainfall, temperature, seasonal changes



Water Quality Criteria for Surface Waters

- Any research or development development of water quality criteria needs to remain with DPR
 - DPR has the expertise and knowledge of pesticides
 - Has established methods for developing criteria



Let the Coalitions work

- Coalitions have been working and have improved surface water quality by outreach, education and tracking of water quality improvements
- Let them work together to develop a monitoring program that is workable and feasible
- Allow specific research to take place on management practices and effects on groundwater



Central Valley Agriculture Water Quality Coalitions

Improving Water Quality and Agriculture