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SECRETARY FOR
ENVIRONMENTAL PROTECTION

Central Valley Regional Water Quality Control Board

24 December 2015

Parry Klassen, Executive Director
East San Joaquin Water Quality Coalition
1201 L Street
Modesto, CA 95354

CONDITIONAL APPROVAL OF EAST SAN JOAQUIN WATER QUALITY COALITION'S PROXIMITY TO SURFACE WATER WORK PLAN

Thank you for submitting the 1 December 2015 East San Joaquin Water Quality Coalition's (Coalition) Work Plan for addressing potential sediment discharges from parcels adjacent to water bodies that were not identified in the Sediment Discharge and Erosion Assessment Report (SDEAR). This Work Plan was in the conditional approval of the SDEAR.

The Work Plan includes a process for identifying members adjacent to water bodies that would not be required to complete a Sediment and Erosion Control Plan. The process begins with Coalition review of member Farm Evaluation Plans, water channel maps, and aerial photos to identify member parcels adjacent to water bodies which meet one of the following conditions:

1. The Parcel is below the level of the adjacent surface water body or a hydraulic barrier (berm, levee, or elevated roadway) is between the surface water and the parcel.
2. The parcel has riparian vegetation that would prohibit sediment discharges or erosion.

The Work Plan proposes if a member's parcel met one of the aforementioned conditions, the member would not be required to complete a Sediment and Erosion Control Plan.

The Work Plan is acceptable if the parcels that meet condition 1 are vetted by the Coalition to ensure they do not have any discharge mechanisms that could circumvent the barrier or elevation difference. Condition 2 may be used if information regarding the adequacy of the riparian vegetative filter to filter out sediment (such as vegetation types, surface area of the riparian area) is provided with the later Coalition deliverables.

If you have any questions or comments regarding this letter, please contact Sue McConnell at Sue.McConnell@waterboards.ca.gov or by phone at (916) 464-4798.

Sincerely,

Pamela C. Creedon
Executive Officer

Enclosures: Staff Review of Request to Remove Constituents from Management Plan

KARL E. LONGLEY ScD, P.E., CHAIR | PAMELA C. CREEDON P.E., BCEE, EXECUTIVE OFFICER

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Central Valley Regional Water Quality Control Board

TO: Sue McConnell, P.E.
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Adam Laputz, P.E.
Assistant Executive Officer
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FROM: Wesley Ouimette
Engineering Geologist
Irrigated Lands Regulatory Program

Glenn Meeks, P.G.
Senior Engineering Geologist
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DATE: 24 December 2015

SUBJECT: EAST SAN JOAQUIN WATER QUALITY COALITION'S WORK PLAN FOR ADDRESSING THE RISK OF SEDIMENT DISCHARGES FROM PARCELS ADJACENT TO WATERBODIES

On 24 July 2015, the Central Valley Water Board's Executive Officer conditionally approved the East San Joaquin Water Quality Coalition's (Coalition) 15 May 2015 Sediment Discharge and Erosion Assessment Report (SDEAR). A condition of approving the SDEAR was that the Coalition must submit a Work Plan to address the sediment discharge and erosion risk of parcels adjacent to surface waters. This memo is staff's comments to the 1 December 2015 Work Plan submitted by the Coalition.

ESJWQC Proposed Surface Water Proximity Plan

The ESJWQC Work Plan states that the Coalition will first identify all member parcels that are adjacent to surface waters and remove the parcels that are already required to submit a Sediment and Erosion Control Plan (SECP) per the methods outlined in the SDEAR. The next step will be to review the remaining member parcels to see if they meet one of the following criteria:

1. The Parcel is below the level of the adjacent surface water body or a hydraulic barrier (berm, levee, or elevated roadway) is between the surface water and the parcel.
2. The parcel has riparian vegetation that would prohibit sediment discharges or erosion.

The Coalition proposes to review member Farm Evaluation Plans, water channel maps and aerial photos to determine if any of the subject parcels meet any of the aforementioned criteria and can be removed from the requirement of completing a SECP.

Staff Issues and Recommendations:

Issue 1 – Member parcels meeting the first criteria could still have sediment discharges to the adjacent surface water body via ditches, pipes or culverts that penetrate the barrier and/or tile drains, all of which could circumvent the barrier or elevation difference. While these parcels may

not pose as significant a threat to surface water as parcels adjacent to a water body without a barrier, there can still be discharge potential.

Staff Recommendation - *Allow parcels that meet criteria one to be low vulnerability with regard to sediment discharge, provided parcels are vetted by the Coalition to ensure they do not have any discharge mechanisms that could circumvent the barrier or elevation difference. If there is a culvert or other runoff mechanism through the levee, then the member of the parcel should complete a SECP.*

Issue 2 - The presence of a riparian filter strip does not guarantee sediment trapping. Use of filter strips is typically a best management practice and the NRCS has a guidance document for designing and establishing riparian filter strips to ensure that proper filter strip width and vegetation type are used for the appropriate slope gradient. Additionally, filter strips have a limited useful life, based on sediment accumulation rates. Once that useful life has been reached (6 inches of sediment has accumulated), filter strips need to be re-graded and re-established.

Staff Recommendation - *Allow the use of naturally-occurring riparian filter strips to eliminate parcels from SECP requirements, but require the Coalition to provide additional information, such as, what types of vegetation would be considered acceptable for use as a filter strip, what minimum filter strip width would be utilized and what would be the maximum permissible slope for use of this criteria. Additionally, these filter strips will need to be re-evaluated by the member on a periodic basis to ensure that the filter strip is still performing adequately. However, if the riparian filter strip is a constructed management practice, maintained by the operation, the member parcel should be required to prepare a SECP that includes the riparian filter strip construction and maintenance details.*