



September 23, 2013

Pamela Creedon, Executive Officer  
Joe Karkoski, Assistant Executive Officer  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114

Re: ESJWQC Modification to Management Plan Priority Subwatershed Schedule

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC) is requesting a modification of the Management Plan schedule which was approved on July 1, 2013 in the ESJWQC Management Plan Update Report. A revised Management Plan Performance Goals and Measures schedule reflecting the modification is provided below.

Table 1 reflects the updated schedule and replaces Silva Drain @ Meadow Dr with Ash Slough @ Ave 21. Ash Slough @ Ave 21 was moved up from priority status in 2015-2017 (seventh priority) to 2014-2016 (sixth priority) and Silva Drain @ Meadow Dr was moved from priority status in 2014-2016 (sixth priority) to 2015-2017 (seventh priority). Ash Slough @ Ave 21 first required a management plan in 2006 based on 2005 monitoring results and is in a management plan for *E. coli*, copper, lead and chlorpyrifos. Silva Drain @ Meadow Rd first required a management in 2009 based on 2008 monitoring results and is in a management plan for dissolved oxygen, ammonia, *E. coli*, copper, chlorpyrifos, and toxicity to *Ceriodaphnia dubia* and *Hyalella azteca*. There has been discussion with Regional Board staff regarding the sources of water quality impairments to Silva Drain and the Coalition is in the process of contacting both members and dairy owners in the subwatershed to better understand the source of discharges. The Coalition is requesting the replacement of the current prioritization schedule with the schedule in Table 1. Replacing Silva Drain @ Meadow Dr with Ash Slough @ Ave 21 will permit the Coalition to address management plan constituents in the Ash Slough @ Ave 21 subwatershed and allow for sufficient time to better understand the hydrology and water quality impairment sources in the Silva Drain @ Meadow Dr.

Table 2 is the proposed Performance Goals and Measures for sixth priority subwatersheds (Ash Slough @ Ave 21, Mustang Creek @ East Ave and Westport Drain @ Vivian Rd) and includes a completion date between 2014 and 2016 for each of the goals/measures. The completion dates in this request have been updated and the goals and measures are similar to those for the fifth priority site subwatersheds that were approved November 1, 2012.

Submitted respectfully,

Parry Klassen

Executive Director, East San Joaquin Water Quality Coalition

**Table 1. Schedule for addressing each site subwatershed with a detailed, focused Management Plan approach (previous schedule dates approved on July 1, 2013, Table 6 in the 2013 Management Plan Update Report).**

<b>SITE SUBWATERSHED NAME</b>	<b>PREVIOUS YEAR FOR FOCUSED APPROACH</b>	<b>UPDATED YEAR FOR FOCUSED APPROACH</b>
Dry Creek @ Wellsford Rd	2008-2010	2008-2010
Duck Slough @ Hwy 99	2008-2010	2008-2010
Prairie Flower Drain @ Crows Landing Rd	2008-2010	2008-2010
Cottonwood Creek @ Rd 20	2010-2012	2010-2012
Duck Slough @ Gurr Rd	2010-2012	2010-2012
Highline Canal @ Hwy 99	2010-2012	2010-2012
Bear Creek @ Kibby Rd	2010-2012	2010-2012
Lateral 2 ½ near Keyes Rd	2011-2013	2011-2013
Berenda Slough along Ave 18 1/2	2011-2013	2011-2013
Dry Creek @ Rd 18	2011-2013	2011-2013
Livingston Drain @ Robin Ave	2011-2013	2011-2013
Hilmar Drain @ Central Ave	2012-2014	2012-2014
Black Rascal Creek @ Yosemite Rd	2012-2014	2012-2014
Deadman Creek @ Hwy 59	2012-2014	2012-2014
Deadman Creek (Dutchman) @ Gurr Rd	2012-2014	2012-2014
Hatch Drain @ Tuolumne Rd	2013-2015	2013-2015
Highline Canal @ Lombardy Rd	2013-2015	2013-2015
Merced River @ Santa Fe	2013-2015	2013-2015
Miles Creek @ Reilly Rd	2013-2015	2013-2015
<b>Ash Slough @ Ave 21</b>	<b>2015-2017</b>	<b>2014-2016</b>
Mustang Creek @ East Ave	2014-2016	2014-2016
Westport Drain @ Vivian Rd	2014-2016	2014-2016
<b>Silva Drain @ Meadow Dr</b>	<b>2014-2016</b>	<b>2015-2017</b>
Mootz Drain downstream of Langworth Pond	2015-2017	2015-2017
Howard Lateral @ Hwy 140	2015-2017	2015-2017
Levee Drain @ Carpenter Rd	2016-2018	2016-2018
McCoy Lateral @ Hwy 140	2016-2018	2016-2018
Rodden Creek @ Rodden Rd	2016-2018	2016-2018
<b>RE-EVALUATE ALL SITE SUBWATERSHEDS AND REVISE SCHEDULE</b>	<b>ANNUALLY</b>	<b>ANNUALLY</b>

**Bolded** rows indicate sites where years for focused approach have been updated.

**Table 2. High Priority Performance Goals status for 2014–2016 high priority site subwatersheds (Ash Slough @ Ave 21, Mustang Creek @ East Ave and Westport Drain @ Vivian Rd).**

PERFORMANCE GOAL/PERFORMANCE MEASURE	OUTPUTS	WHO	COMPLETION DEADLINES		
			ASH SLOUGH @ AVE 21	MUSTANG CREEK @ EAST AVE	WESTPORT DRAIN @ VIVIAN RD
<b>Performance Goal 1: Individually contact members on adjacent properties to waterways where discharges have been identified to fill out surveys.</b>					
Performance Measure 1.1 – 100% of identified growers contacted to fill out surveys.	Report ratio of individual initial contacts made versus total growers identified to contact.	Parry Klassen	March 30, 2014	March 30, 2014	March 30, 2014
Performance Measure 1.2 – Contact owners/operators in the site subwatershed with direct drainage membership acreage.	Report ratio of acreage represented by individual contacts versus subwatershed acreage determined to have direct drainage.	MLJ-LLC	Quarterly	Quarterly	Quarterly
<b>Performance Goal 2: Establish current practices (beyond established baseline practices) on adjacent properties to waterways or where discharges are identified.</b>					
Performance Measure 2.1 – Document current management practices of 100% of identified growers during individual contacts and encourage the adoption of new practices not currently implemented.	Record in an Access database current management practices used that may reduce agricultural impact on water quality.	Parry Klassen	September 30, 2014	September 30, 2014	September 30, 2014
Performance Measure 2.2 – Document management practices that the identified grower were encouraged to implement.	Summary of management practice evaluations on a site subwatershed level in the Management Plan Update Report.	MLJ-LLC	October 31, 2014	October 31, 2014	October 31, 2014
<b>Performance Goal 3: Encourage growers to implement additional management practices based on water quality results.</b>					
Performance Measure 3.1 – Document (e.g. assess number/type) new management practices implemented by identified growers.	Record implemented management practices from returned surveys in an Access database.	Parry Klassen/ MLJ-LLC	Feb. 28, 2015*	Feb. 28, 2015*	Feb. 28, 2015*
	Summary of management practices implemented as a result of individual contacts.	MLJ-LLC	May 1, 2015 May 1, 2016	May 1, 2015 May 1, 2016	May 1, 2015 May 1, 2016
<b>Performance Goal 4: Evaluate effectiveness of the new management practices implemented during years that site is high priority.</b>					
Performance Measure 4.1 – Assess water quality results from Coalition monitoring location within the priority site subwatershed.	Summary of water quality data from Management Plan Monitoring.	MLJ-LLC	May 1, 2015 May 1, 2016	May 1, 2015 May 1, 2016	May 1, 2015 May 1, 2016
<b>Performance Goal 5: Consult with CVRWQCB at least once to discuss Management Plan activities and consider if changes need to be made in Management Plan strategy for High Priority waterbodies.</b>					

\*Contacts with growers to determine implemented practices will occur between February 1 and April 30; all information obtained by February 28<sup>th</sup> will be entered into an Access database and included in the following May 1 Management Plan Update Report; any additional information will be reported on during the quarterly meetings.