
Central Valley Regional Water Quality Control Board

30 May 2012

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CONSTITUENT REMOVAL FROM THE EAST SAN JOAQUIN WATER QUALITY COALITION SITE SUBWATERSHED MANAGEMENT PLAN

Thank you for submitting the 6 January 2012 request to remove monitoring requirements for specific constituents from selected East San Joaquin Water Quality Coalition (Coalition) site subwatershed Management Plans. The request proposes to remove 35 site/constituent pairs from active management plan status and from the management plan monitoring schedule based primarily on two or more years with no exceedances of a specific constituent.

The Central Valley Regional Water Quality Control Board staff has reviewed the proposed constituent removal request. Based on the information provided in the request letter and staff's attached memorandum, I approve the completion of management plans for 33 site/constituent pairs. Management plan efforts should continue for the remaining two site/constituent pairs, although management plan monitoring can be suspended per my letter dated 17 April 2012. Table 1 of the staff memorandum identifies the management plans approved and not approved for completion.

If you have any questions or comments regarding this letter, or need any further information, please contact Jelena Hartman at jhartman@waterboards.ca.gov or by phone at 916-464-4628.

Original signed by

Pamela C. Creedon
Executive Officer

Enclosure: Staff Review of Request to Remove Constituents from Management Plan
Monitoring Schedule - East San Joaquin Water Quality Coalition

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
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FROM: Jelena Hartman
Environmental Scientist
MONITORING AND IMPLEMENTATION UNIT
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 30 April 2012

SUBJECT: REQUEST TO REMOVE CONSTITUENTS FROM MANAGEMENT PLAN
MONITORING SCHEDULE – EAST SAN JOAQUIN WATER QUALITY
COALITION

The California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received a request from the East San Joaquin Water Quality Coalition (Coalition) on 6 January 2012 to remove a total of 35 site/constituent pairs from its approved Management Plan and from the Management Plan Monitoring (MPM) schedule (Table 1). If the completion of management plans is approved, monitoring would continue according to the Coalition's approved Monitoring and Reporting Program Plan.

The Coalition initiated general outreach at all subwatersheds in 2007, and each subwatershed is addressed with a detailed, focused Management Plan approach according to an approved schedule. The Coalition's request to remove specific site/constituent pairs from the management plan is based on meeting the criterion of "no exceedances during two consecutive years of monitoring in months of past exceedances", and documented current and newly implemented management practices. The Coalition provided detailed rationale for each site and constituent. In addition to the Coalition's letter, staff received additional information via e-mail on 14 and 17 February 2012.

The following considerations were taken into account when evaluating the Coalition's request to remove constituents from the management plan:

- The date of the most recent exceedance and water quality since the exceedance
- Adequacy of the monitoring strategy and if monitoring data are sufficient to evaluate effectiveness of outreach and implemented management practices
- Adoption of management practices to reduce storm and irrigation runoff
- Trends in pesticides and copper use based on Pesticide Use Reporting (PUR)
- Timeline for Management Plan implementation
- Future monitoring schedule.

Based on the Coalition's rationale and the above considerations, each request for removal of a site/constituent pair was evaluated leading to the following conclusions:

- There are sufficient monitoring data since the most recent exceedance and/or other supporting information¹ to approve the completion of 33 management plans (Tables 1 and 2).
- Monitoring data and other considerations do not support completion of two management plans. Implementation of management plans should continue, although MPM can be suspended, for copper and pH at Highline Canal at Highway 99 (Tables 1 and 3).

Table 1. Summary of sites and constituents petitioned to be removed from management plan status and from the management plan monitoring (MPM) schedule, and staff determinations.

Site Subwatershed	Dissolved Oxygen (DO)	pH	Specific Conductivity (SC)	Copper (Total and Dissolved)	Lead (Total and Dissolved)	Ammonia	<i>E. coli</i>	Total Dissolved Solids (TDS)	Chlorpyrifos	Diazinon	Diuron	Simazine	<i>Ceriodaphnia dubia</i>	<i>Selenastrum capricornutum</i>
Ash Slough at Ave 21					✓		✓		✓					
Bear Creek at Kibby Rd	✓								✓				✓	
Cottonwood Creek at Rd 20										✓	✓			
Deadman Creek (Dutchman) at Gurr Rd				✓										
Dry Creek at Wellsford Rd			✓	✓							✓			✓
Duck Slough at Gurr Rd			✓					✓	✓					✓
Duck Slough at Hwy 99	✓								✓					✓
Highline Canal at Hwy 99		●	✓	●		✓		✓	✓		✓			
Highline Canal at Lombardy Rd			✓											
Hilmar Drain at Central Ave									✓					
Lateral 2 1/2 near Keyes Rd							✓							
Merced River at Santa Fe	✓													
Mustang Creek at East Ave									✓			✓		
Prairie Flower Drain at Crows Landing Rd		✓							✓					

✓ Completion of management plan approved

● Completion of management plan not approved, monitoring can be suspended

¹ For example, there are not enough monitoring data since the most recent chlorpyrifos, *E. coli*, and lead exceedances to evaluate the effect management practices have had on water quality in the Ash Slough at Avenue 21 site subwatershed, as the site is frequently dry. Although very limited monitoring data are available due to the ephemeral nature of Ash Slough, the combination of other information can be used to support the Coalition's request: the Coalition's monitoring efforts have been in good faith, general outreach in the subwatershed was initiated in 2007, the use of chlorpyrifos decreased by 57% between 2006 and 2010, *E. coli* is to be addressed by the joint Work Plan developed by the Coalitions in the Central Valley, and future assessment monitoring at the site is scheduled for 2015.

Table 2. Site subwatersheds and constituents with sufficient monitoring data or other information to support the completion of management plans and the removal from management plan monitoring (MPM) schedule.

Site Subwatershed	Constituent (date of the most recent exceedance)	SUMMARY OF MONITORING RESULTS						
		Rows represent: Number of tests conducted Number of exceedances						
		2005	2006	2007	2008	2009	2010	2011
Ash Slough @ Ave 21	Chlorpyrifos ⁽²⁾ (3/15/06)	3	7	-	-	1	1	-
		2	2			0	0	
	E. coli (6/13/06)	3	7	-	-	1	1	-
		1	2			0	0	
	Lead (6/13/06)		5	-	-	-	-	-
			2					
Bear Creek @ Kibby Rd ⁽¹⁾	Chlorpyrifos ⁽²⁾ (7/24/07)	6	7	8	10	-	2	2
		0	1	1	0		0	0
	DO (6/13/06)	7	10	10	11	-	3	5
		1	1	0	0		0	0
	C. dubia (7/24/07)	6	7	8	5	-	2	2
		1	1	1	0		0	0
Cottonwood Creek @ Rd 20 ⁽¹⁾	Diazinon ⁽²⁾ (2/25/08)	7	7	5	7	-	1	10
		0	0	0	1		0	0
	Diuron ⁽²⁾ (2/25/08)		5	5	7	-	1	10
			0	0	2		0	0
Deadman Creek @ Gurr Rd ⁽¹⁾	Copper* (1/25/08)		5	8	13 (3)	12 (12)	12 (12)	-
			0	3	1 (0)	5 (0)	4 (0)	
Dry Creek @ Wellsford Rd ⁽¹⁾	Copper* ⁽²⁾ (2/25/08)		5	8	8	-	2 (2)	9 (9)
			0	2	1		0 (0)	1 (0)
	Diuron ⁽³⁾ (2/28/07)		5	8	8	-	1	9
			0	2	0		0	0
	SC (1/20/09)	7	9	13	14	12	12	14
		0	0	0	0	1	0	0
S. capricornutum (2/26/08)	7	7	10	10	-	1	10	
	0	0	4	1		0	0	
Duck Slough @ Gurr Rd ⁽¹⁾	Chlorpyrifos ⁽³⁾ (7/31/04)	7	7	9	9	5	2	11
		0	0	0	0	0	0	0
	SC (11/17/09)	7	13	12	11	12	11	12
		0	0	0	0	1	0	0
	TDS (9/30/04)	7	7	8	9	11	12	9
		0	0	0	0	0	0	0
	S. capricornutum (7/24/07)	7	7	9	8	-	2	10
		0	0	1	0		0	0

Table 2. (continued)

Site Subwatershed	Constituent (date of the most recent exceedance)	SUMMARY OF MONITORING RESULTS						
		Rows represent: Number of tests conducted Number of exceedances						
		2005	2006	2007	2008	2009	2010	2011
Duck Slough @ Hwy 99 ⁽¹⁾	Chlorpyrifos ⁽²⁾ (9/30/08)	7	7	9	8	3	3	3
		1	1	1	1	0	0	0
	DO (6/16/09)	8	10	13	10	6	6	7
		0	1	0	0	1	0	0
	<i>S. capricornutum</i> (5/07/08)	8	7	8	9	1	2	2
1		0	0	2	0	0	0	
Highline Canal @ Hwy 99 ⁽¹⁾	Ammonia (2/26/08)		5	7	8	9	11	7
			0	0	2	0	0	0
	Chlorpyrifos ⁽²⁾ (7/21/09)	5	7	7	9	1	3	9
		0	1	1	2	1	0	0
	Diuron ⁽²⁾ (1/24/08)		5	7	8	-	2	9
			0	1	1		0	0
	SC (2/26/08)	6	10	9	17	9	11	11
		0	0	0	1	0	0	0
	TDS (2/26/08)	5	6	6	8	9	11	7
		0	0	0	2	0	0	0
Highline Canal @ Lombardy	SC (3/04/08)	8	11	13	16	3	3	13
		0	0	0	1	0	0	0
Hilmar Drain @ Central Ave ⁽¹⁾	Chlorpyrifos ⁽²⁾ (7/13/06)	7	7	8	8	-	-	-
		0	1	0	0			
Lateral 2 ½ near Keyes Rd ⁽¹⁾	<i>E. coli</i> (11/11/08)				2	7	8	-
					2	0	0	
Merced River @ Santa Fe	DO (10/20/09)	7	9	8	15	12	12	14
		0	1	0	1	2	0	0
Mustang Creek @ East Ave	Chlorpyrifos ⁽³⁾ (2/26/08)		3	4	2	4	4	-
			0	0	2	0	0	
	Simazine ⁽²⁾ (2/26/08)		3	4	2	4	4	-
			0	0	2	0	0	
Prairie Flower Drain @ Crows Landing Rd ⁽¹⁾	Chlorpyrifos ⁽²⁾ (8/19/08)	7	7	10	8	1	2	9
		2	0	1	1	0	0	0
	pH (3/17/09)	7	13	15	17	12	12	14
		0	2	3	0	1	0	0

* dissolved fraction in parenthesis

⁽¹⁾ subwatersheds where high priority management plan has been implemented

⁽²⁾ use declined since the most recent exceedance (PUR data)

⁽³⁾ use increased since the most recent exceedance (PUR data)

Table 3. Site subwatersheds and constituents with insufficient monitoring data to support completion of management plans.

Site Subwatershed	Constituent (date of the most recent exceedance)	SUMMARY OF MONITORING RESULTS						
		2005	2006	2007	2008	2009	2010	2011
Highline Canal @ Hwy 99 ⁽¹⁾	Copper ^{*(2)} (2/07/12)		5	7	12	-	6 (6)	7 (7)
			0	5	2		2 (0)	2 (0)
	There were two exceedances of the dissolved copper water quality objective based on hardness in 2012, and the use of copper has almost doubled between 2008 and 2010 (98% increase).							
	pH (11/08/11)	6	10	9	17	9	11	11
		0	1	3	5	5	0	1
There was an exceedance on 11/8/2011, and the criterion of no exceedances during two consecutive years of monitoring is not met.								

* dissolved fraction in parenthesis

⁽¹⁾ subwatersheds where high priority management plan has been implemented

⁽²⁾ use increased since the most recent exceedance (PUR data)