

November 18, 2013

Pamela Creedon, Executive Officer
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

RE: Proposed Change of Representative Monitoring Site at Pine Creek

Dear Ms Creedon:

The Sacramento Valley Water Quality Coalition (Coalition) requests that the site for monitoring the representative Pine Creek drainage in the Butte-Yuba-Sutter watershed for the 2014 monitoring year and subsequent years be conducted on Pine Creek at Highway 32 (PNCHY). The new location would replace the currently assigned representative site at Nord-Gianella Road (PNCGR).

The proposed new location offers several advantages over the current site. It captures all of the drainage of the current location plus additional acreage in the lower Pine Creek drainage. It also captures drainage from an additional tributary and generally characterizes more drainage with similar cropping. We believe the proposed site will have more consistent flows and will be less affected by the ponding and stagnation issues at the current site, and will also provide equivalent or better representation of agricultural discharges and potential impacts. The main reason the proposed location wasn't selected originally was due to access concerns — however, these are now outweighed by other factors (primarily a need for a more reliable flows to sample).

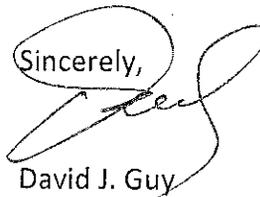
The site is about 2.1 miles south of the Gianella Road monitoring site and ~4 miles west of the outskirts of Chico. The latitude and longitude coordinates are 39.75338°N, 121.97124°W. Attached is a map showing the proposed location. Suitable and safe public access to the sampling site can be secured.

Re-evaluation of the Pine Creek monitoring site was initiated after a series of consecutive water quality exceedances of chlorpyrifos were observed at the Pine Creek at Nord-Gianella Road monitoring site. At the recommendation of the Central Valley Regional Water Quality Control Board (Regional Water Board) staff, the Coalition undertook an investigation into the reason for the exceedances. The July, August, September and October exceedances show a pattern of declining chlorpyrifos concentrations, beginning with a reading of 0.248 µg/L and ending with a reading of 0.0383 µg/L.

The Pine Creek Action Plan submitted by the Coalition documented the outreach meeting conducted by the Coalition, its subwatershed leadership, the Butte County Agricultural Commissioner's Office, University of California Cooperative Extension (UCCE) crop advisors, pesticide control advisors, and most importantly landowners representing 92.5% of the irrigated acreage in the subwatershed. One of the actions recommended by consensus at the meeting was to move the monitoring site to a location that doesn't dry up seasonally to create the isolated ponds in which sampling was conducted when the exceedances were observed. Lack of flow and isolated ponding is a common occurrence at the Nord-Gianella Road site during the irrigation season, and we believe this condition does not adequately represent irrigation tailwater discharges to Pine Creek.

Working with the landowners and other participants at the meeting, the proposed new site at Highway 32 was identified and determined to be representative of the irrigated agriculture characterized by the Pine Creek at Nord-Gianella site, as well as the other represented drainages. The Pine Creek drainage is representative of approximately 77,000 acres of agriculture in three additional drainages in the Butte-Yuba-Sutter watershed: Little Chico Creek, Big Chico Creek, and Dicus Slough. These drainages are dominated by orchard crops (primarily nuts and stonefruit), plus smaller percentage ($\leq 15\%$ each) of rice, row crops, grain, pasture, forage, and alfalfa in the valley floor areas. The watershed sampled upstream from the original monitoring site at Nord-Gianella Road characterizes approximately 13,440 acres of varied farmland, riparian habitat and farmsteads. The new proposed site at Highway 32 characterizes approximately double the agricultural acreage, adds crop diversity from the lower valley area, and provides more reliable flows to sample.

We believe the proposed new Pine Creek location is more representative and will provide more reliable characterization of agricultural discharges needed to meet ILRP goals. The Coalition requests that you approve this change for the ongoing 2014 monitoring and subsequent monitoring years.

Sincerely,

David J. Guy

Cc: Juleah Cordi
Richard Price
Rob Hill
Bruce Houdesheldt
Claus Suverkropp

