

# San Joaquin County and Delta Water Quality Coalition

San Joaquin County Resource Conservation District  
3422 W. Hammer Lane, Suite A  
Stockton, California 95219  
209-472-7127 ext 125

August 19, 2014

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

Re: SJCDWQC Performance Goal Modification for Seventh Priority Site Subwatersheds

Dear Ms. Creedon,

The San Joaquin County and Delta Water Quality Coalition (SJCDWQC) requests a modification of its Management Plan Performance Goals and Measures schedule for focused outreach in the Drain to Bishop Cut @ North Rio Blanco Rd and Empire Tract @ 8 Mile Rd (2015-2017, 7<sup>th</sup> priority subwatersheds) site subwatersheds. Both subwatersheds are in management plans for: dissolved oxygen (DO), specific conductance (SC), total dissolved solids (TDS), and arsenic. Table 1 includes a list of all exceedances and associated discharge measurements. Both subwatersheds are scheduled for targeted outreach in 2015 as described in the SJCDWQC Management Plan. Targeted outreach includes meetings with identified members to discuss agricultural practices that could be contributing to water quality impairments, education regarding management practices that can be implemented to reduce agricultural runoff that could be contributing to the exceedances, and assistance with filling out surveys that document existing management practices.

Growers in priority site subwatersheds are targeted for outreach based on their applications of constituents that are in management plans. A targeted grower list cannot be identified when constituents are not applied. The constituents in management plans at the two sites are constituents that require further source identification studies or work plans since they are not constituents that are applied nor easily sourced. Furthermore, Management Plan Monitoring (MPM) is not scheduled for constituents that cannot be sourced.

Therefore, growers in the seventh priority site subwatersheds will not be targeted for focused outreach because 1) the constituents in management plans are not constituents that can be easily sourced and a targeted grower list cannot be developed, 2) farm evaluation surveys documenting existing management practices will be filled out by June 2015 for all members within these subwatersheds, and 3) with the submission of the revised Surface Water Quality Management Plan, preliminary analyses and source identification work plans will be developed for constituents in management plans that cannot be sourced. The Coalition discusses constituents which cannot be sourced and different management

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practices that could be effective in reducing and eliminating exceedances during general and focused outreach.

Since 2008, the Coalition has addressed first the watersheds with the most severe discharges followed by site subwatersheds with fewer exceedances. In many instances, the sources of the constituents responsible for the exceedances are not known (e.g. nitrate, arsenic, and copper), and the cause of exceedances of WQTLs for parameters such as DO are not well understood. As required in the Waste Discharge Requirements General Order for Growers within the San Joaquin County and Delta Area (WDR or General Order; No. R5-2014-0029), a revised Surface Water Quality Management Plan, including an updated management plan compliance timetable for constituents requiring source identification studies or work plans, will be submitted on May 1, 2015. For constituents such as nitrate, arsenic, and copper, a preliminary analysis or source identification work plan will be developed prior to establishing a compliance schedule, engaging in individual grower outreach, and monitoring for compliance.

As discussed in the SJCDWQC 2015 Monitoring Plan Update (MPU), Empire Tract @ 8 Mile Rd is scheduled for Represented site monitoring in the Terminous Tract Drain @ Hwy 12 Zone (Zone 3) for the 2015 WY. During Represented site monitoring, field parameters such as DO and SC will be monitored during each sampling event. Bishop Cut @ North Rio Blanco Rd falls within the Hydrologic Unit Code (HUC) and will be represented by Empire Tract @ 8 Mile Rd in future monitoring due to access issues at the Bishop Cut location. Growers within both of these subwatersheds will be required to fill out Farm Evaluation surveys which will document management practices implemented by members in 2014. A revised Surface Water Quality Management Plan will be submitted on May 1, 2015 and will include a revised compliance schedule for management plan constituents and updated Management Plan Strategy and Performance Goals and Measures to reflect the updated timelines and proposed work plans.

Submitted respectfully,



Michael L. Johnson  
Technical Program Manager

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**Table 1. Exceedances of WQTLs and associate discharge measurements at Drain to Bishop Cut @ North Rio Blanco Rd and Empire Tract @ 8 Mile Rd.**

Station Name	Sample Date	Discharge, cfs*	Oxygen, Dissolved, mg/L	Specific Conductivity, µS/cm	Total Dissolved Solids, mg/L	E. coli, MPN/100 mL	Arsenic, Total, µg/L	Pimephales promelas, %Control	Selenastrum capricornutum, % Control
Drain to Bishop Cut @ North Rio Blanco Rd	1/15/2013	0	6.17	880	690				
	2/21/2013	0		979	720		12		
	3/19/2013	0	3.53	807	550		23		
Empire Tract @ 8 Mile Rd	7/16/2013	NA	3.07			648.8	14		
	8/20/2013	NA	2.08				14		
	8/21/2013	NA	4.63						
	9/17/2013	0	1.04						
	10/8/2013	NA	1.87		460				
	11/19/2013	NA	2.19		510		13		
	12/17/2013	NA	4.10						
	1/28/2014	NA	6.65		490				
	2/11/2014	NA	3.32	1046	800				
	3/3/2014	NA		1440	1000		12	83	
	3/5/2014	NA	3.02	1363					
	4/15/2014	0			1500		18		57
	5/20/2014	0	4.29	1814	1300	488.4	44		
6/17/2014	NA	3.26	1042	630		47			

\*Discharge measurements of zero indicate the pump station was not running at the time of sample collection.

cfs- cubic feet per second

NA- too deep to measure discharge