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June 5, 2009

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

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition is submitting a request to update its Monitoring and Reporting Program Plan (MRPP) submitted on August 25, 2008 to omit the sampling location South Slough @ Quinley Rd from its monitoring plan. The Coalition monitored the location named South Slough @ Quinley Rd from July 2006 to September 2008 until the new MRPP was approved on September 15, 2008. Under the new MRPP, South Slough @ Quinley Rd is not being monitored and is not scheduled to be monitored until 2021. The Coalition has determined that the location monitored previously is actually Nealon Lateral and not South Slough. Both water bodies are located within a few meters of each other and the original field sampling crew started sampling the wrong water body. In addition, the Coalition has learned from the Modesto Irrigation District that neither Nealon Lateral nor South Slough discharge to surface waters. The attached letter further identifies the reasons for dropping the location South Slough @ Quinley Rd from its MRPP including photographs of the sampling location, aerial and GIS maps clearly noting both South Slough and Nealon Lateral, the location where samples have been collected and the flow of water.

Additional documentation can be supplied as needed. If approved, the Coalition will update relevant MRPP tables and submit them to the Regional Board staff.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "PK", is written over a white background.

Parry Klassen
Board Chairman
East San Joaquin Water Quality Coalition

The East San Joaquin Water Quality Coalition (ESJWQC or Coalition) is requesting that South Slough @ Quinley Rd (N 37.26983, W -120.59711) be removed from the Coalition's Monitoring and Reporting Program Plan (MRPP) for the following reasons:

1. The sampling originally intended for South Slough @ Quinley Rd is actually being conducted on Nealon Lateral, not South Slough.
2. Both South Slough and Nealon Lateral do not discharge to surface waters.
3. Nealon Lateral @ Quinley Rd is a supply canal and does not receive agricultural inputs.
4. The Coalition zone in which South Slough and Nealon Lateral are located (Zone 4) will be adequately characterized by the ten other Assessment Monitoring locations identified in the Coalition's MRPP that are scheduled to be sampled based on a rotation schedule.

1. South Slough @ Quinley Rd is actually Nealon Lateral, not South Slough.

South Slough originates immediately west of the city of Merced and El Capitan Canal, less than one mile southeast of Crocker Dam, and flows southwest for 11 miles. Nealon Lateral diverges from Gurr Lateral between Buhach and Quinley Rds; it crosses about 1000' of open field and then turns southwest and flows parallel to South Slough for approximately two miles. South Slough then turns west and Nealon Lateral continues south for about 500' and ends. Approximately one mile from its origin at Gurr Lateral, Nealon Lateral crosses Quinley Rd only 15 – 20 m immediately north of South Slough.

Figure 1. Aerial photograph (from Google maps) depicting South Slough (white dotted line) and Nealon Lateral (black dotted line).



The Coalition originally selected South Slough @ Quinley Rd as a monitoring location based on ARC GIS land use maps and aerial photography (target latitude 37.26983, longitude -120.59711). Samplers located the site using latitude/longitude coordinates and indicated it was suitable for sampling, however the samplers were unaware that Nealon Lateral ran parallel to South Slough and was only 15-20 meters

north of where South Slough crosses Quinley Rd. The accuracy of the GPS unit suggested that the site identified as South Slough could be South Slough. In addition, South Slough rarely has any water (which was unknown when the site was originally selected) and is covered most of the year by blackberry bushes making it difficult to see as well as access. Therefore, field crews began collecting samples from Nealon Lateral in July 2006 under the assumption that Nealon Lateral was South Slough (actual latitude 37.26964, longitude -120.59744). All samples have been collected from the region of Nealon Lateral immediately west of Quinley Rd (noted with a dotted white circle in Figure 2).

Figure 2. Photo of South Slough and Nealon Lateral west of Quinley Rd (facing south) taken on May 27, 2008 (with water). Dotted circle indicates where samples are collected.



Figure 3. Photos of South Slough and Nealon Lateral west of Quinley Rd (facing south) taken on April 17, 2007 (no water).



Figure 4. Photo of Nealon Lateral (dry) facing west; taken on May 27, 2008.



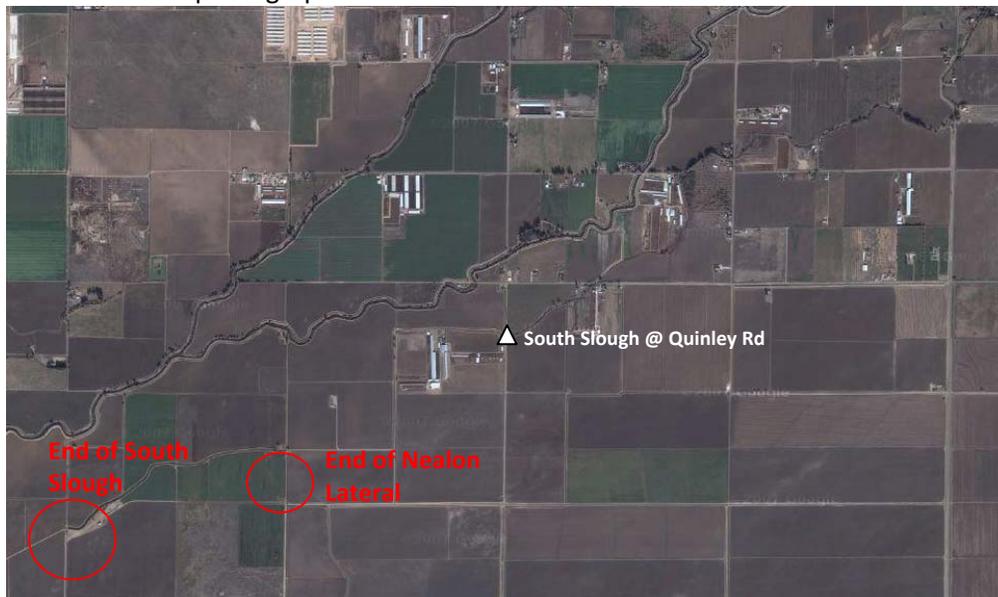
Figure 5. Photo of South Slough (dry) facing east; taken on February 7, 2009.



2. Both South Slough and Nealon Lateral do not discharge to surface waters.

Approximately one mile southwest of Quinley Rd, Nealon Lateral leaves Merced Irrigation District (MID) land and all water is pumped out of the lateral by surrounding land owners. In extraordinary years, water from Nealon Lateral overflows into South Slough. According to MID and updated aerial photographs, South Slough does not drain to surface waters. South Slough drains towards the East Side Canal; the East Side Canal flows north towards the Merced River, but is pumped dry before it reaches the river (Figure 1, Figure 6).

Figure 6. Aerial photograph indicating where South Slough and Nealon Lateral ends. Figure 1 includes the same aerial photograph with road and drain names for reference.



3. Nealon Lateral (South Slough @ Quinley Rd) is a supply canal and does not receive agricultural inputs.

Because Nealon Lateral is an above grade MID supply canal, no irrigation water can passively drain into it, nor is return water actively pumped into it (according to MID staff). The Coalition is unable to access Nealon Lateral between road crossings and is unable to verify the claim by MID. Nealon Lateral diverges from Gurr Lateral, which is known as Meadowbrook Lateral north of Hwy 140. Meadowbrook Lateral diverges from the Bear Creek above Crocker Dam at river mile 20 (Figure 1). Meadowbrook, Gurr, and Nealon Laterals are all elevated supply canals above the South Slough @ Gurr Rd (Nealon Lateral) sampling site.

4. The Coalition zone that South Slough and Nealon Lateral are located in (Zone 4) will be adequately characterized by the ten other Assessment Monitoring locations identified in the Coalition’s MRPP that are scheduled to be sampled based on a rotation schedule.

South Slough @ Quinley Rd (Nealon Lateral) lies on the southern periphery of Zone 4. The Coalition has previously described the creation of zones within the Coalition region by assessing similarities in crop type, surface to groundwater depth, soil type, amount of dairies/feedlots, and land use. Therefore sites listed in the MRPP within Zone 4 will sufficiently represent the area currently represented by this site even with the omission of South Slough @ Quinley Rd (Nealon Lateral). Assessment sites within Zone 4 are included in the ESJWQC Monitoring and Reporting Program Plan (MRPP) with site descriptions and maps and include Bear Creek @ Kibby Rd, Black Rascal Creek @ Yosemite Rd, Canal Creek @ West

Bellevue Rd, Howard Lateral @ Hwy 140, Livingston Drain @ Robin Ave, McCoy Lateral @ Hwy 140, and Unnamed Drain near Bear Creek @ West Bose Rd.

Monitoring at South Slough @ Quinley Rd (Nealon Lateral) ceased in October 2008 when the new ESJWQC MRPP was approved. Sites scheduled to be monitored within Zone 4 from October 2008 to December 2011 include Merced River @ Santa Fe Rd (Core Monitoring location) and Howard Lateral @ Hwy 140 (Assessment Monitoring location). South Slough was not scheduled to be sampled again until 2021 (see Table 10 of the ESJWQC MRPP submitted on August 25, 2008). With the omission of South Slough @ Quinley Rd (Nealon Lateral) as an Assessment Monitoring location, Livingston Drain @ Robin Ave will be monitored from in 2021 and 2022. Since the water collected from South Slough @ Quinley Rd was actually collected from Nealon Lateral which according to MID is only a supply canal and does not receive irrigation discharge, there is no need to add in an additional site to the current list of Zone 4 Assessment Monitoring locations.

Figure 7. Site subwatershed map of land use for the South Slough @ Quinley Rd sample site previously submitted in the ESJWQC MRPP. The pink triangle marks the current sampling site.

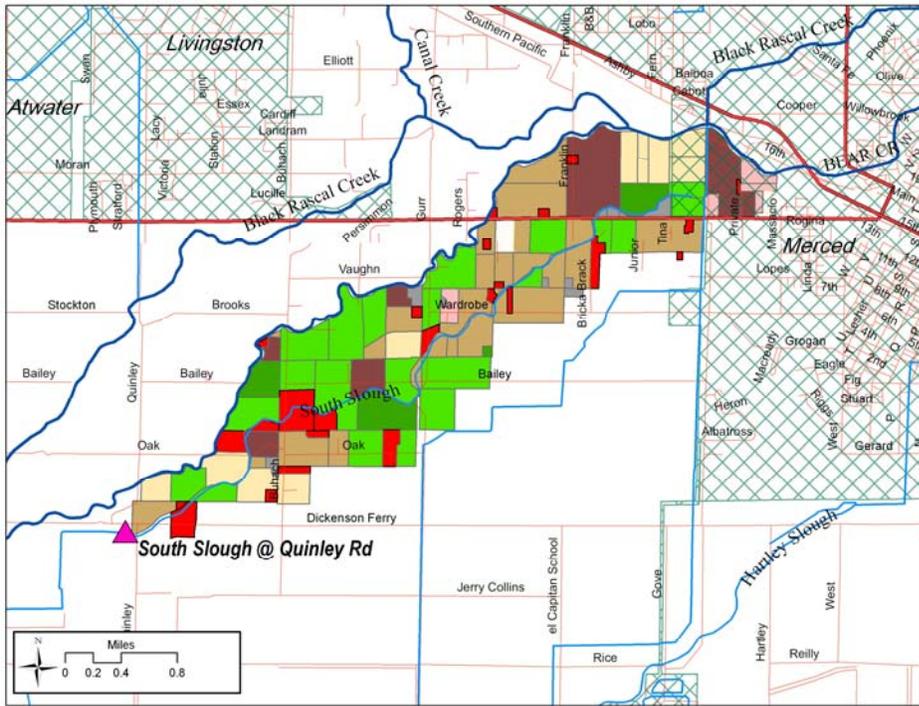


Figure 8. Site subwatershed map of land use for the South Slough @ Quinley Rd sample site. The pink triangle marks the current sampling site, and the dotted line traces Nealon Lateral from its point of divergence from Bear Creek to its terminus. Water in both Nealon Lateral and South Slough flows from NE to SW.

