

October 12, 2010

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 modify the Coalition's Management Plan proposed schedule for activities within each of its Management Plan site subwatersheds. The Management Plan was submitted as required by the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands Resolution Order No. R5-2006-0053, Monitoring and Reporting Program Order No. R5-2008-0005 and was approved on November 25, 2008.

The requested modification includes moving the Ash Slough @ Ave 21 subwatershed from priority status in 2011-2013 to priority status in 2015-2017 and moving Lateral 2 ½ near Keyes Rd subwatershed from priority status in 2015-2017 to 2011-2013. This change is being made to target subwatershed Lateral 2 ½ near Keyes Rd which experienced recent exceedances of the chlorpyrifos water quality objective. This water body drains directly into the San Joaquin River and the Coalition believes that addressing the movement of chlorpyrifos into Lateral 2 ½ and the San Joaquin River is critical in meeting the Coalition's TMDL requirements and improving water quality. Monitoring was initiated at Ash Slough in the irrigation season of 2005. Ash Slough has been dry for all but two sampling events from January 2009 through September 2010. Additionally, Ash Slough empties into the Eastside Bypass before eventually reaching the San Joaquin River. Even when water is present in Ash Slough @ Ave 21, it almost always disappears into the stream bed prior to entering the Bypass.

Included with this request is a table of subwatershed specific performance goals for 2011 - 2013 high priority subwatersheds (Berenda Slough along Ave 18 ½, Dry Creek @ Rd 18, Lateral 2 ½ near Keyes Rd, Livingston Drain @ Robin Ave).

Submitted respectfully,



Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition

Requested updates to the priority site subwatershed schedule.

Per discussion between the East San Joaquin Water Quality Coalition (ESJWQC or Coalition) and Regional Water Board staff on September 14, 2010, we are requesting a revision of the ESJWQC Management Plan schedule for addressing each site subwatershed with a detailed, focused management plan approach (Table 7 in the Management Plan update submitted on April 1, 2010) to include the following updates:

1. Ash Slough @ Ave 21 will be addressed in 2015-2017 instead of 2011-2013
2. Lateral 2 ½ near Keyes Rd (lower portion) will be addressed in 2011-2013 instead of 2015-2017

Lateral 2 ½ near Keyes Rd was initially monitored by the Coalition in October 2008 as an Assessment Monitoring location in Zone 2. This site is under the ESJWQC Management Plan for pH, *E. coli* and chlorpyrifos. Of greatest importance are the exceedances of the water quality objective for chlorpyrifos that has occurred in July of 2009 and 2010 and in April of 2010. Lateral 2 ½ is an irrigation delivery canal that flows into the San Joaquin River downstream of the monitoring location (Figure 1). The entire subwatershed drains approximately 32,740 irrigated acres from just east of the San Joaquin River through the City of Modesto and up to Turlock Lake to the east. The Coalition reviewed the parcels that would have direct drainage (direct drainage includes spray drift of parcels next to Lateral 2 ½) and determined that there are approximately 117 members that have the potential to drain/drift into Lateral 2 ½. Therefore the Coalition plans to focus on approximately 38 growers that have parcels between Keyes Rd and Highway 99 (Figure 2). If the focused management plan approach detailed in the ESJWQC Management Plan (contact growers, conduct field visits/interviews, document current management practices and any recommended practices, and conduct follow up with growers to document any newly implemented practices in the following year) with the members in the lower portion of the subwatershed, the Coalition will extend its focus in the south/east portion of the subwatershed and then finally in the north/east portion of the subwatershed. However, it is anticipated that focusing on the most downstream members will have the largest impact on improving water quality inputs from agriculture.



Lateral 2 ½ near Keyes Rd will replace Ash Slough @ Ave 21 as a third high priority subwatershed that will undergo a focused management plan approach between 2011 and 2013. Ash Slough is located in the southern portion of the ESJWQC area where there are sandy soils and little runoff. The Coalition is requesting to address this subwatershed in 2015 instead of 2011 due to the number of months that this site has been dry recently. Since 2005, Ash Slough has been dry 22% (12 events sampled out of 54) of the time that it has been monitored including monthly monitoring since October 2008. Ash Slough is included in the ESJWQC Management Plan for *E. coli*, copper, lead, and chlorpyrifos. However, the last exceedance (and detection) of chlorpyrifos occurred in 2005.

If the above schedule change is approved, the Coalition will conduct individual contacts and interviews with growers to obtain current management practice information, discuss additional practices that could be implemented and conduct monitoring in Lateral 2 ½ near Keyes Rd for chlorpyrifos during months of past exceedances in 2011 and 2012. Results of interviews and monitoring results will be reported in the Management Plan Update Report to be submitted on April 1, 2012 and April 1, 2013 (see Table 1).

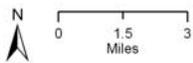
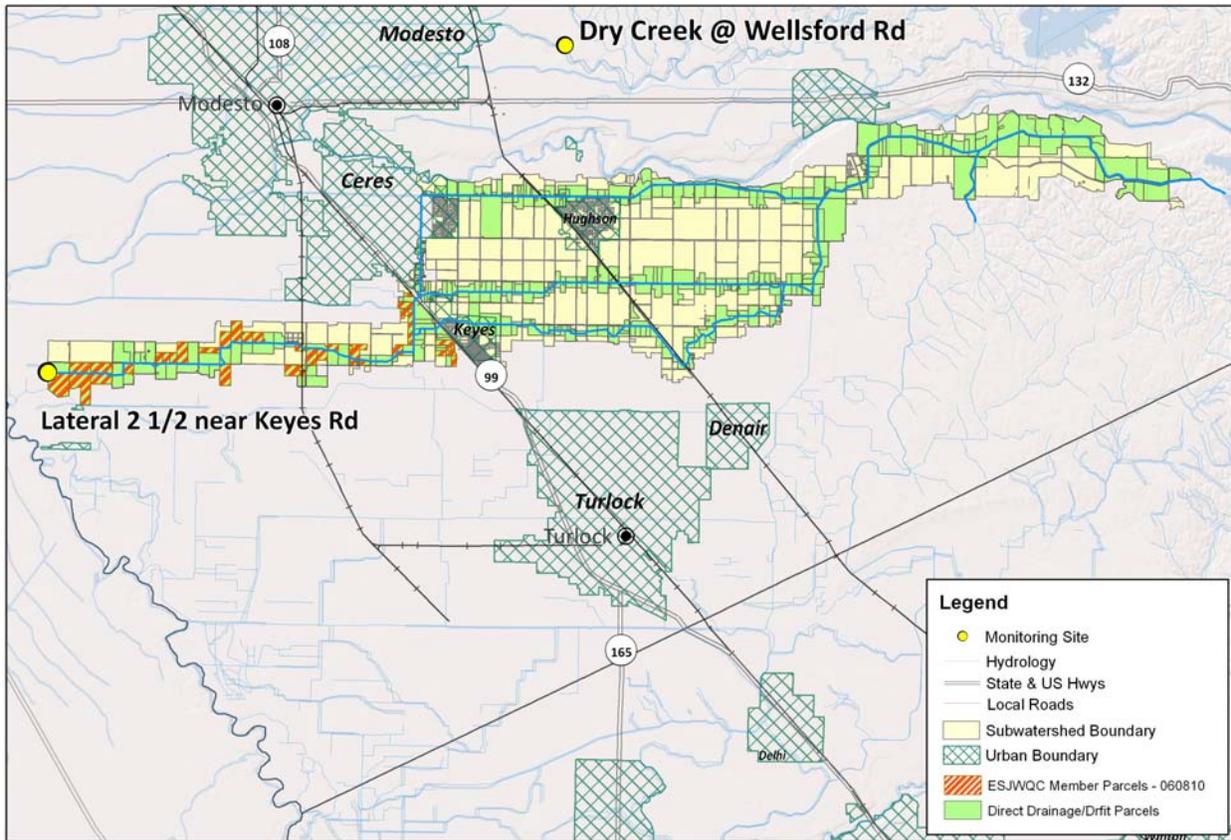


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Figure 1. Lateral 2 1/2 flow into the San Joaquin River (designated by a yellow line).



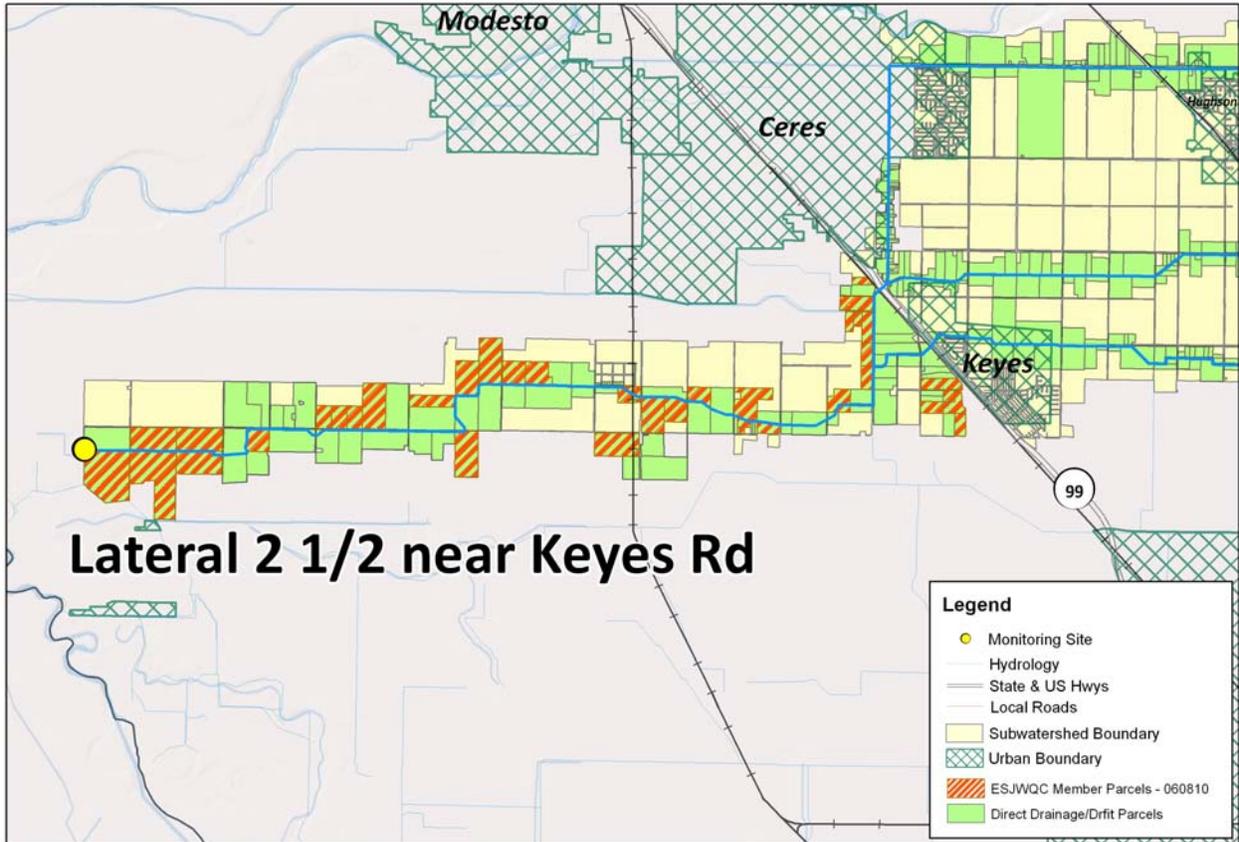
Figure 2. Lateral 2 ½ direct drain / drift parcels; member parcels in the western most portion of the subwatershed will be contacted in 2011 – 2013 (orange hatch).



**Lateral 2 1/2 near Keyes Rd - Direct Drain/Drift Parcels
and Member Parcels**

Date Prepared: 10/02/10
ESJWQC

Figure 3. Lateral 2 1/2 near Keyes western portion targeted members.



**Lateral 2 1/2 near Keyes Rd - Direct Drain/Drift Parcels
and Member Parcels**

Date Prepared: 10/02/10
ESJWQC



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Table 1. Proposed schedule for addressing each site subwatershed with a detailed, focused management plan approach (previous schedule dates approved on November 18, 2009, Table 6 in the 2010 Management Plan Update Report).

SITE SUBWATERSHED NAME	PREVIOUS YEAR FOR FOCUSED APPROACH	UPDATED YEAR FOR FOCUSED APPROACH
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
Ash Slough @ Ave 21	2011-2013	2015-2017
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 Creak @ 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
Mustang Creek @ East Ave	2014-2016	2014-2016
Silva Drain @ Meadow Dr	2014-2016	2014-2016
South Slough @ Quinley Rd	2014-2016	2014-2016
Westport Drain @ Vivian Rd	2014-2016	2014-2016
Lateral 2 ½ near Keyes Rd (lower portion)	2015-2017	2011-2013
Mootz Drain Downstream of Langworth Pond	2015-2017	2015-2017
Evaluate All Subwatersheds and Revise Schedules	Annually	Annually

Bolded years indicates updated years for a focused approach.

Performance goals and measures for the 2011 – 2013 priority site subwatersheds

On September 14, 2010 the ESJWQC and Regional Board staff discussed the 2011 – 2013 (3rd priority subwatersheds) priority subwatershed performance goals and measures. Completion deadlines are in bold. The goals and measures are the same that were used for the 2010 – 2012 site subwatersheds (2nd priority subwatersheds) with updated completion dates that follow the contact, evaluation and implementation process outlined in the 2010 ESJWQC Management Plan Update Report (Figure 3, page 20).



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Table 2. Subwatershed specific performance goals for 2011 - 2013 high priority subwatersheds (Berenda Slough along Ave 18 ½, Dry Creek @ Rd 18, Lateral 2 ½ near Keyes Rd, Livingston Drain @ Robin Ave).

PERFORMANCE GOAL/PERFORMANCE MEASURE	OUTPUTS	WHO	COMPLETION DEADLINE			
			BERENDA SLOUGH ALONG AVE 18 ½	DRY CREEK @ RD 18	LATERAL 2 ½ NEAR KEYES RD (LOWER PORTION)	LIVINGSTON DRAIN @ ROBIN AVE
PERFORMANCE GOAL 1:						
INDIVIDUALLY CONTACT MEMBERS ON ADJACENT PROPERTIES TO WATERWAYS WHERE DISCHARGES HAVE BEEN IDENTIFIED TO FILL OUT SURVEYS.						
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	Mar. 30, 2011	Mar. 30, 2011	Mar. 30, 2011	Mar. 30, 2011
Performance Measure 1.2 – Contact owners/operators representing at least 1,000 acre of membership acreage in the site subwatershed (if subwatershed is greater than 800 acres).	Report ratio of acreage represented by individual contacts versus subwatershed acreage determined to have direct drainage.	MLJ-LLC	Quarterly	Quarterly	Quarterly	Quarterly
PERFORMANCE GOAL 2:						
ESTABLISH CURRENT PRACTICES (BEYOND ESTABLISHED BASELINE PRACTICES) ON ADJACENT PROPERTIES TO WATERWAYS OR WHERE DISCHARGES ARE IDENTIFIED.						
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	July 30, 2011	July 30, 2011	July 30, 2011	July 30, 2011
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.	MLJ-LLC	Aug.30, 2011	Aug. 30, 2011	Aug. 30, 2011	Aug. 30, 2011

PERFORMANCE GOAL/PERFORMANCE MEASURE	OUTPUTS	WHO	COMPLETION DEADLINE			
			BERENDA SLOUGH ALONG AVE 18 ½	DRY CREEK @ RD 18	LATERAL 2 ½ NEAR KEYES RD (LOWER PORTION)	LIVINGSTON DRAIN @ ROBIN AVE
PERFORMANCE GOAL 3: ENCOURAGE GROWERS TO IMPLEMENT ADDITIONAL MANAGEMENT PRACTICES BASED ON WATER QUALITY RESULTS.						
Performance Measure 3.1 –Document (e.g. assess number/type) new management practices implemented by identified growers.	Record implemented management practices in an Access database.	PARRY KLASSEN, MLJ-LLC	Feb. 28, 2012*	Feb. 28, 2012*	Feb. 28, 2012*	Feb. 28, 2012*
	Summary of management practices implemented as a result of individual contacts.	MLJ-LLC	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013
PERFORMANCE GOAL 4: EVALUATE EFFECTIVENESS OF THE NEW MANAGEMENT PRACTICES IMPLEMENTED DURING YEARS THAT SITE IS HIGH PRIORITY.						
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	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013	April 1, 2012 April 1, 2013
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 WATER BODIES.						

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