

# SAN JOAQUIN VALLEY DRAINAGE AUTHORITY

P O Box 2157 Los Banos, CA 93635  
209 826 9696 Phone 209 826 9698 Fax

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## WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION

October 20, 2016

Jay Simi  
Central Valley Regional Water Quality Control Board  
11020 Sun Center Drive, Suite 200  
Rancho Cordova, CA 95670-6114

Subject: Proposed Revisions to the 303(d) List of Impaired Water Bodies and Consideration of an Integrated Assessment Report for the Central Valley Region

Dear Jay:

Thank you for your previous responses to my email of September 23, 2016. I have included some of those comments below as well as additional comments to make sure they are in the record. I serve as watershed coordinator for the Westside San Joaquin River Watershed Coalition, one of the ILRP coalitions. Many of my comments are related to my experience with the Westside Coalition and our participation in the CVSalts process. Comments by category are listed below:

### **Listing of the San Joaquin River for EC and TDS.**

The proposed listing includes:

1. SJR BEAR CREEK to Mud Slough for TDS.
2. SJR Merced River to Tuolumne River for EC and TDS.

Are the Vernalis objectives and beneficial uses being used for this listing? The Regional Board is poised to establish a salinity objective for the San Joaquin River between Vernalis and the Merced River next year with a proposed objective of 1550 EC. The water quality issue is therefore being addressed and should be taken into account. It makes little sense to begin a TMDL process given the changes being made.

### **Listing of constituents that are under a management plan.**

The proposed listing includes constituents that are under a proposed management plan under the Westside Coalition.

Examples:

Hospital Creek is under a proposed management plan for arsenic, methyl parathion and specific conductivity.

Ingram Creek is under a proposed management plan for arsenic, DDT, E-coli, Nitrate+nitrite as N, simazine and EC.

Attached is a table showing the constituents under the proposed management plan. Thus, these constituents and water bodies are being addressed and these water body/constituent combinations and the others on the table should be removed from the "New Listings-TMDL Required" category.

### **San Joaquin River Salt and Boron TMDL.**

The San Joaquin River is under a TMDL for salt and boron. The Westside Coalition is complying with this TMDL through organization and participation through a real time management program, which is authorized under the current Basin Plan Amendment and allows salt disposal at appropriate times. The water bodies that are tributary to the San Joaquin River that are under the San Joaquin River TMDL should not be included in the "TMDL Required" column:

Example:

Hospital Creek is listed as "TMDL Required" for EC and TDS, yet Hospital Creek is complying with the TMDL through the real time program.

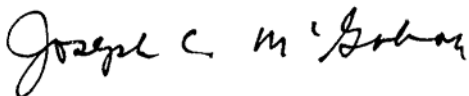
### **General comment.**

Proceeding to a TMDL is premature due to the existing programs and expected improvements that are underway. I have experience with the need for and development and compliance with TMDL's. It is a tremendous effort for the Board to develop and for regulated parties to comply with TMDL's, when other measures to address the water quality issue are already in place.

### **Confusing references.**

I also noted confusing references in the fact sheets. For example for Hospital Creek the DDE reference in LOE 78811 says the data reference is for the City of Anderson. Anderson is nowhere near Hospital Creek. And LOE 79208 gives the date reference as the Westland Storm Water Coalition, again Hospital Creek is not near the Westland Storm Water Coalition. In response to my email of September 23, 2016 you stated that these references were going to be corrected.

Very truly yours,



Joseph C, McGahan  
Watershed Coordinator  
Westside San Joaquin River Watershed Coalition

Table 3: Westside Coalition Sites Under Mangement Plans - July 2004 through December 2015

Site	DO	pH	E. Coli	EC	Arsenic	Boron	Selenium	Copper (Dissolved)	Lead (Dissolved)	Nickel (Dissolved)	Nitrogen (Nitrate-Nitrite)	Ammonia	Chlordane	Dieldrin	DDD	DDE	DDT	Chlorpyrifos	Diazinon	Dimethoate	Diuron	Malathion	Methyl-Parathion	Simazine	Algae Toxicity	Minnow Toxicity	Water Flea Toxicity	Sediment Toxicity	
Blewett Drain near Highway 132	x	x	x	x								x				x		x			x							x	
Del Puerto Cr at Hwy 33		x	x	x												x			x									x	x
Del Puerto Cr near Cox Road		x	x	x		x					x					x		x										x	x
Hospital Cr at River Road	x	x	x	x	x	x										x	x	x	x			x			x		x	x	
Ingram Cr at River Road	x	x	x	x	x	x					x	x				x	x	x		x	x	x	x	x	x	x	x	x	x
Los Banos Creek at China Camp Road	x	x	x	x	x	x												x							x			x	
Los Banos Creek at Highway 140	x	x	x	x	x	x																x						x	
Marshall Road Drain near River Road	x	x	x	x	x	x						x	x			x	x	x	x	x	x	x	x		x		x	x	
Mud Slough u/s San Luis Drain	x	x	x	x	x	x												x											
Newman Wasteway near Hills Ferry Road	x	x	x	x		x										x		x	x	x					x		x	x	
Orestimba Cr at Hwy 33	x	x	x	x			x									x	x	x	x	x	x	x			x		x	x	
Orestimba Cr at River Road	x	x	x	x												x	x	x	x								x	x	
Poso Slough at Indiana Avenue	x	x	x	x	x							x						x				x	x		x			x	
Ramona Lake near Fig Avenue	x	x	x	x		x					x	x						x				x						x	x
Salt Slough at Lander Avenue	x	x	x	x	x	x												x				x	x		x			x	
Salt Slough at Sand Dam	x	x	x	x														x				x	x		x			x	
San Joaquin River at Lander Avenue	x	x	x	x	x																	x	x		x				
Westley Wasteway near Cox Road	x	x	x	x		x										x	x	x				x			x				x
Delta Mendota Canal at Del Puerto WD	x	x	x																x										
San Joaquin River at PID Pumps	x	x	x	x		x													x										
San Joaquin River at Sack Dam	x	x																	x										x

x indicates 2 or more exceedances within a 3 calendar year period.