



1201 L Street Modesto, CA 95354  
www.esjcoalition.org

September 1, 2017

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

Re: *Submittal of Monitoring Plan Update Amendment for Waste Discharge Requirements General Order R5-2012-0116-R3 for Growers in the Eastern San Joaquin River Watershed*

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC) is submitting an Amendment to the Monitoring Plan Update (MPU) for the 2018 WY. The Coalition is submitting a reduced monitoring schedule to account for Delta Regional Monitoring Program (RMP) contributions. Based on conversations with Regional Board staff during the August 16, 2017 meeting, the Coalition is proposing reduced monitoring for toxicity to *Pimephales promelas* at Core sites and reduced monitoring at Highline Canal @ Lombardy Rd as in previous years. The primary considerations used to determine if reduced monitoring at a Core site should occur include 1) has the site been adequately characterized (20+ samples analyzed within the last 5 years), and 2) no toxicity in the past five years (Table 1).

Table 1: Core site monitoring history and counts for water column toxicity to *P. promelas*.

Year	Zone 1: DCAWR	Zone 2: PFDCL	Zone 3: HCHNN	Zone 4: MRSFD	Zone 5: DSAGR	Zone 6: CCART	Grand Total
2004				3	3		6
2005	7	7	5	7	7	7	40
2006	7	8	7	7	7	7	43
2007	8	9	7	8	8	5	45
2008	8	8	8	8	8	8	48
2009						6	6
2010						8	8
2011	12	12	9	12	11	10	66
2013	3	5	1	3	3	Dry (4)	15
2014	12	10	8	12	11	Dry (12)	53
2015	11	9	7	9	5	Dry (9)	41
2016	11		9		2	Dry (2)	22
2017	3		3		1	Dry (2)*	7
Total Samples	82	68	64	69	66	51 (Dry-29)	400
# Toxicity	0	2	0	0	2	1	5

Dry – MPM was scheduled for dissolved copper only; monitoring for toxicity was not scheduled during these events.

\*Three monitoring events were scheduled in January, April, and July 2017. Water was present for sample collection in April 2017.

In Zone 6, monitoring results indicate that dissolved copper and nutrients are the primary constituents of concern. Within Zone 6, the Coalition has analyzed 133 samples for toxicity to *P. promelas* from 2005 through March 2017 and a single toxicity occurred in January 2008 in samples collected from Cottonwood Creek. Since October 2011, the Cottonwood Creek @ Rd 20 monitoring site has been



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consistently dry. From 2013 through the 2017 WY, the Coalition scheduled 29 monitoring events at Cottonwood Creek @ Rd 20 and was able to collect one sample in April 2017 (copper MPM). Samples collected in April 2017 had concentrations of copper that were in exceedance of the hardness based WQTL for dissolved copper (4.5 µg/L, variable WQTL 2.3 µg/L).

Justification for reducing monitoring for toxicity to *P. promelas* during the 2018 WY at Cottonwood Creek @ Rd 20 is based on 1) monitoring results from all sites within Zone 6, 2) frequently dry conditions at the site, and 3) improved water quality as demonstrated by Cottonwood Creek @ Rd 20 site subwatershed completed management plans (chlorpyrifos, diazinon, and diuron).

During the 2018 WY, the Coalition will monitor for *P. promelas* as previously scheduled at all Management Plan Monitoring (MPM) and Represented sites for *P. promelas* toxicity. The ESJWQC proposes to reduce monitoring for 51 analyses (Table 2). With the proposed monitoring reduction, all Core sites except Duck Slough @ Gurr Rd have reduced monitoring for toxicity to *P. promelas*. The total cost savings is approximately \$34,000 to account for the ESJWQC's contribution to the Delta RMP.

Table 2: Reduced *P. promelas* toxicity monitoring proposal at Core sites.

Zone	Core Site Name	Monitoring Type	Scheduled 2018 WY Core Site <i>P. promelas</i> Analysis Counts	Proposed 2018 WY Core Site <i>P. promelas</i> Reduced Monitoring Analysis Counts
1	Dry Creek @ Church St	C	11	11
2	Prairie Flower Drain @ Crows Landing Rd	C	7	7
3	Highline Canal @ Hwy 99	C	11	11
4	Merced River @ Oakdale Rd	C	12	12
5	Duck Slough @ Gurr Rd	C	9	0
		M	2	0
6	Cottonwood Creek @ Rd 20	C	10	10
<b>Totals</b>			<b>62</b>	<b>51</b>

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

Submitted respectfully,

Parry Klassen  
Executive Director  
East San Joaquin Water Quality Coalition

Enclosure:

Attachment A: Updated 2018 WY Monitoring Schedule Workbook