
Central Valley Regional Water Quality Control Board

22 January 2016

Mike Wackman, Legislative/Communications Director
San Joaquin County and Delta Water Quality Coalition
3294 Ad Art Road
Stockton, CA 95215

CONDITIONAL APPROVAL OF THE SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION'S PROXIMITY TO SURFACE WATER WORK PLAN

Thank you for submitting the 15 December 2015 San Joaquin County and Delta Water Quality Coalition's (Coalition) Work Plan for addressing potential sediment discharges from parcels adjacent to water bodies that were not identified in the Sediment Discharge and Erosion Assessment Report (SDEAR). This Work Plan was in the conditional approval of the SDEAR.

The Work Plan includes a process for identifying members adjacent to water bodies that would not be required to complete a Sediment and Erosion Control Plan. The process begins with Coalition review of member Farm Evaluation Plans, water channel maps, and aerial photos to identify member parcels adjacent to water bodies which meet one of the following conditions:

1. The Parcel is below the level of the adjacent surface water body or a hydraulic barrier (berm, levee, or elevated roadway) is between the surface water and the parcel.
2. The parcel has riparian vegetation that would prohibit sediment discharges or erosion.

The Work Plan proposes if a member's parcel met one of the aforementioned conditions, the member would not be required to complete a Sediment and Erosion Control Plan.

The Work Plan is approved with the following conditions: 1) the parcels that meet condition 1 must be vetted by the Coalition to ensure they do not have any discharge mechanisms that could circumvent the barrier or elevation difference, and 2) Condition 2 may only be used to remove the requirement to develop a plan if information and criteria regarding the adequacy of the riparian vegetative filter to filter out sediment (such as vegetation types, surface area of the riparian area) is provided by the Coalition and approved by the Board (See attached staff memo for more information).

If you have any questions or comments regarding this letter, please contact Sue McConnell at Sue.McConnell@waterboards.ca.gov or by phone at (916) 464-4798.

Sincerely,

Original Signed by Patrick Pulupa for:

Pamela C. Creedon
Executive Officer

Enclosures: Staff Review of Surface Water Proximity Work Plan

Central Valley Regional Water Quality Control Board

TO: Sue McConnell, P.E.
Program Manager
Irrigated Lands Regulatory Program

Adam Laputz, P.E.
Assistant Executive Officer
Central Valley Water Board

FROM: Wesley Ouimette
Engineering Geologist
Irrigated Lands Regulatory Program

Glenn Meeks, P.G.
Senior Engineering Geologist
Irrigated Lands Regulatory Program

DATE: 16 January 2016

SUBJECT: SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION'S WORK PLAN FOR ADDRESSING THE RISK OF SEDIMENT DISCHARGES FROM PARCELS ADJACENT TO WATERBODIES

On 12 August 2015, the Central Valley Water Board's Executive Officer conditionally approved the San Joaquin County and Delta Water Quality Coalition's (SJCDWQC or Coalition) 27 April 2015 Sediment Discharge and Erosion Assessment Report (SDEAR). A condition of approving the SDEAR was that the Coalition must submit a Work Plan to address the sediment discharge and erosion risk of parcels adjacent to surface waters. This memo is staff's comments to the 15 December 2015 Work Plan submitted by the Coalition.

SJDWQC Proposed Surface Water Proximity Plan

The Work Plan states that the Coalition will first identify all member parcels that are adjacent to surface waters and remove the parcels that are already required to submit a Sediment and Erosion Control Plan (SECP) per the methods outlined in the SDEAR. The next step will be to review the remaining member parcels to see if they meet one of the following criteria:

1. The Parcel is below the level of the adjacent surface water body or a hydraulic barrier (berm, levee, or elevated roadway) is between the surface water and the parcel.
2. The parcel has riparian vegetation that would prohibit sediment discharges or erosion.

The Coalition proposes to review member Farm Evaluation Plans, water channel maps and aerial photos to determine if any of the subject parcels meet any of the aforementioned criteria and can be removed from the requirement of completing a SECP.

Staff Issues and Recommendations:

Issue 1 – Member parcels meeting the first criteria could still have sediment discharges to the adjacent surface water body via ditches, pipes or culverts that penetrate the barrier, all of which could circumvent the barrier or elevation difference. While these parcels may not pose as significant a threat to surface water as parcels adjacent to a water body without a barrier, there can still be discharge potential.

Staff Recommendation – *Staff agree that parcels that fully meet criteria one have a lower vulnerability to sediment discharge. However, the Coalition must properly vet the parcels to ensure that none have discharge mechanisms that could circumvent the barrier or elevation difference. If there is a culvert or other runoff mechanism through the levee, then the member of the parcel should complete a SECP.*

Issue 2 - The presence of a riparian filter strip does not guarantee sediment trapping. Use of filter strips is typically a best management practice and the NRCS has a guidance document for designing and establishing riparian filter strips to ensure that proper filter strip width and vegetation type are used for the appropriate slope gradient. Additionally, filter strips have a limited useful life, based on sediment accumulation rates. Once that useful life has been reached (6 inches of sediment has accumulated), filter strips need to be re-graded and re-established.

Staff Recommendation – *Additional information is needed before staff can determine the acceptability of the proposed riparian filter criteria's use to exclude parcels from SECP requirements. The Coalition needs to provide more detailed information as to what types of natural vegetation would be considered acceptable for use as a filter strip, what minimum filter strip width would be utilized and what would be the maximum permissible parcel slope allowed to use this exclusion criteria. However, if the riparian filter strip is an actual constructed management practice, maintained by the operation, the member parcel should be required to prepare a SECP that includes the filter strip construction and maintenance details. Additionally, all filter strips should be re-evaluated by the member on a periodic basis to ensure that the filter strip is still performing adequately.*