

Central Valley Regional Water Quality Control Board

28 January 2019

Mr. Michael Wackman
San Joaquin & Delta Water Quality Coalition
3294 Ad Art Road
Stockton CA 95215

Mr. Mike Johnson, Program Manager
MLJ-LLC
1480 Drew Ave, Suite 130
Davis, CA 95618

2019 WATER YEAR MONITORING PLAN UPDATE ADDENDUM - SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Thank you for submitting the 15 January 2019 addendum to modify the San Joaquin County and Delta Water Quality Coalition's approved Monitoring Plan Update (MPU) for the 2019 Water Year. The addendum is in response to the Coalition's evaluation of the potential for risks or threats to water quality that are associated with exceedances that occurred during the June through September 2018 monitoring period. The June through September monitoring data was not available when the Coalition prepared its original 1 August 2018 MPU.

Per the Order, when a water quality objective or trigger limit is exceeded at a Core site, the third-party must evaluate the potential for similar risks or threats to water quality associated with that parameter at the Represented sites. If pesticide use or other factors indicate a risk, the third-party must perform monitoring for a minimum of two years during the period of highest risk of exceedance of water quality objectives for that parameter.

Staff conducted a review of the Coalition's evaluation and justifications for monitoring decisions and agrees with the Coalition's January 2019 addendum. Based on the staff evaluation of the MPU Addendum, I approve the 2019 Water Year monitoring schedule to include the additional bifenthrin monitoring at the sites mentioned in Table 2 of the attached memorandum. If you have questions regarding this letter, please contact Chris Jimmerson at (916) 464-4859 or by email at Chris.Jimmerson@waterboards.ca.gov.

Sincerely,

Patrick Pulupa,
Executive Officer

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Chris Jimmerson
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 23 January 2019

SUBJECT: 15 January 2019 MONITORING PLAN UPDATE ADDENDUM – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

On 15 January 2019, the San Joaquin County and Delta Water Quality Coalition (Coalition) submitted a Monitoring Plan Update (MPU) addendum with justification for revisions to the 2019 Water Year monitoring schedule. This was in response to the Coalition’s evaluation of the potential for risks or threats to water quality that are associated with exceedances that occurred during the June through September 2018 monitoring period (Table 1). The June through September monitoring data was not available when the Coalition prepared its original 1 August 2018 MPU. Per Order requirements, exceedances at a Core site, trigger an evaluation of similar risks to water quality at the associated Represented sites.

If pesticide use information or other factors indicate a risk, the Coalition must either 1) perform monitoring for that parameter in the appropriate Represented water bodies, or 2) where site access is not available, implement the applicable surface water quality management plan actions associated with the Core site.

Table 1. 2018 Water Year June through September exceedances

Site Name	Site Type	Exceedance
1) French Camp Slough @ Airport Way	Core	Bifenthrin
2) Unnamed Drain to Lone Tree Creek @ Jack Tone Rd	Represented	Chlorpyrifos
3) Drain @ Woodbridge Rd	Core	Selenastrum toxicity
4) Roberts Island @ Whiskey Slough Pump	Represented	Selenastrum toxicity
5) Walthall Slough @ Woodward Ave	Core	Selenastrum toxicity
6) Union Island Drain @ Bonetti Rd	Core	Selenastrum toxicity

The Coalition’s evaluation is based on three criteria: 1) monitoring history, 2) pesticide use, and 3) management practice data. Staff reviewed the Coalition’s MPU addendum to determine if additional monitoring is required or not needed because the approved 2019 Water Year monitoring schedule is adequate.

1. French Camp Slough @ Airport Way

To determine if additional bifenthrin sampling is required for the 2019 Water Year, the Coalition evaluated the potential risk of water quality exceedances at the Core site French Camp and its Represented sites by evaluating pesticide use report data.

Staff agrees that bifenthrin monitoring should be added to French Camp Slough and its Represented sites in the 2019 Water Year beginning in May for a minimum of two years, per the Order (Table 2).

Table 2. 2019 Water Year Bifenthrin Monitoring Schedule

Site	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
French Camp Slough at Airport Way					X	X	X	X	X			
Littlejohns Creek @Jack Tone Rd					X	X	X	X	X			
Lone Tree Creek @Jack Tone Rd					X	X	X	X				
Mormon Slough @Jack Tone Rd						X	X	X				
Unnamed Drain to Lone Tree Creek @Jack Tone Rd					X	X	X	X	X			

2. Unnamed Drain to Lone Tree Creek @ Jack Tone Rd.

The Represented site subwatershed is currently in a management plan for chlorpyrifos. Staff agrees that the Coalition should continue with management plan monitoring (MPM) as outlined in the approved 2019 Water Year MPU. No additional monitoring is required.

3. Drain @ Woodbridge Rd.

The Core and all Represented site subwatersheds are currently in a management plan for Selenastrum toxicity. Staff agrees that the Coalition should continue with MPM as outlined in the approved 2019 Water Year MPU. No additional monitoring is required.

4. Roberts Island @ Whiskey Slough Pump

The Represented site subwatershed is currently in a management plan for Selenastrum toxicity. Staff agrees that the Coalition should continue with MPM as outlined in the approved 2019 Water Year MPU. No additional monitoring is required.

5. Walthall Slough @ Woodward Ave.

The Core site subwatershed is currently in a management plan for Selenastrum toxicity. There are no Represented sites for Walthall Slough. Staff agrees that the Coalition should continue with MPM as outlined in the approved 2019 Water Year MPU. No additional monitoring is required.

6. Union Island Drain @ Bonetti Rd.

The Core and all Represented site subwatersheds are currently in a management plan for Selenastrum toxicity. Staff agrees that the Coalition should continue with MPM as outlined in the approved 2019 Water Year MPU. No additional monitoring is required.