East San Joaquin Water Quality Coalition
1201 L Street Modesto, CA 95354
www.esjcoalition.org

April 12, 2012

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

Re: ESJWQC Zone 5 rotating Assessment Monitoring location removal

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC or Coalition) is submitting a request to update its Monitoring and Reporting Program (MRPP) to remove the sampling location Duck Slough @ Hwy 99 (535XDSAHN) from the Coalition's monitoring program. The Coalition would like to remove Duck Slough @ Hwy 99 based on 1) beginning as early as May 2012, any access to Duck Slough @ Hwy 99 will be blocked by construction crews for an undetermined period of time while Highway 99 is expanded, 2) samples from the site will no longer be representative of agricultural irrigation due to discharge and runoff from construction on Highway 99 and 3) once construction is complete Highway 99 will be a six lane highway with no access to the current site. Duck Slough @ Hwy 99 is a first high priority subwatershed and there have been no exceedances of any high priority (A/B-D) constituent at the site since June 2009. The Coalition will continue to monitor Duck Slough at the downstream location at Duck Slough @ Gurr Rd and all Management Plan Monitoring for Duck Slough @ Hwy 99 management plan constituents will take place at the Duck Slough @ Gurr Rd location. Further details on Duck Slough @ Hwy 99 are provided below.

Site Location

The Duck Slough @ Hwy 99 sample location is at N 37.25010, W -120.41000 and is located upstream of the Duck Slough @ Gurr Rd site (N 37.21408, W -120.56126) subwatershed (Figure 1). Duck Slough originates in the Sierra foothills and flows west into the Duck Slough @ Gurr Rd site subwatershed eventually joining with Deadman Creek in the western portion of the Coalition region. Irrigated agriculture in this site subwatershed is primarily deciduous nuts with some truck crops, field crops and irrigated pastureland.

The Coalition monitors downstream of Duck Slough @ Hwy 99 subwatershed at the Duck Slough @ Gurr Rd location. Duck Slough @ Gurr Rd is the Core Monitoring location in Zone 5 and it is scheduled for Assessment Monitoring again in 2014 and every third year thereafter under the current MRP. The Duck Slough @ Gurr Rd subwatershed has similar land use and drains field crops, deciduous nuts and some irrigated pasture.

Since the Duck Slough @ Hwy 99 subwatershed is located in an area adjacent to a section of Highway 99 that is under construction for a highway expansion project, the site will be inaccessible in the near future. Highway construction crews are already in the area and indicated that the sample location will be under construction beginning around May 2012. Orchards on either side of the creek are cleared for up to 150 yards of the waterway in anticipation of construction (Figure 2). Construction is expected to take 2-3 years. Once construction is complete and the highway is widened from the existing four lanes to six lanes, the site may not be accessible immediately upstream or downstream of the Highway 99.

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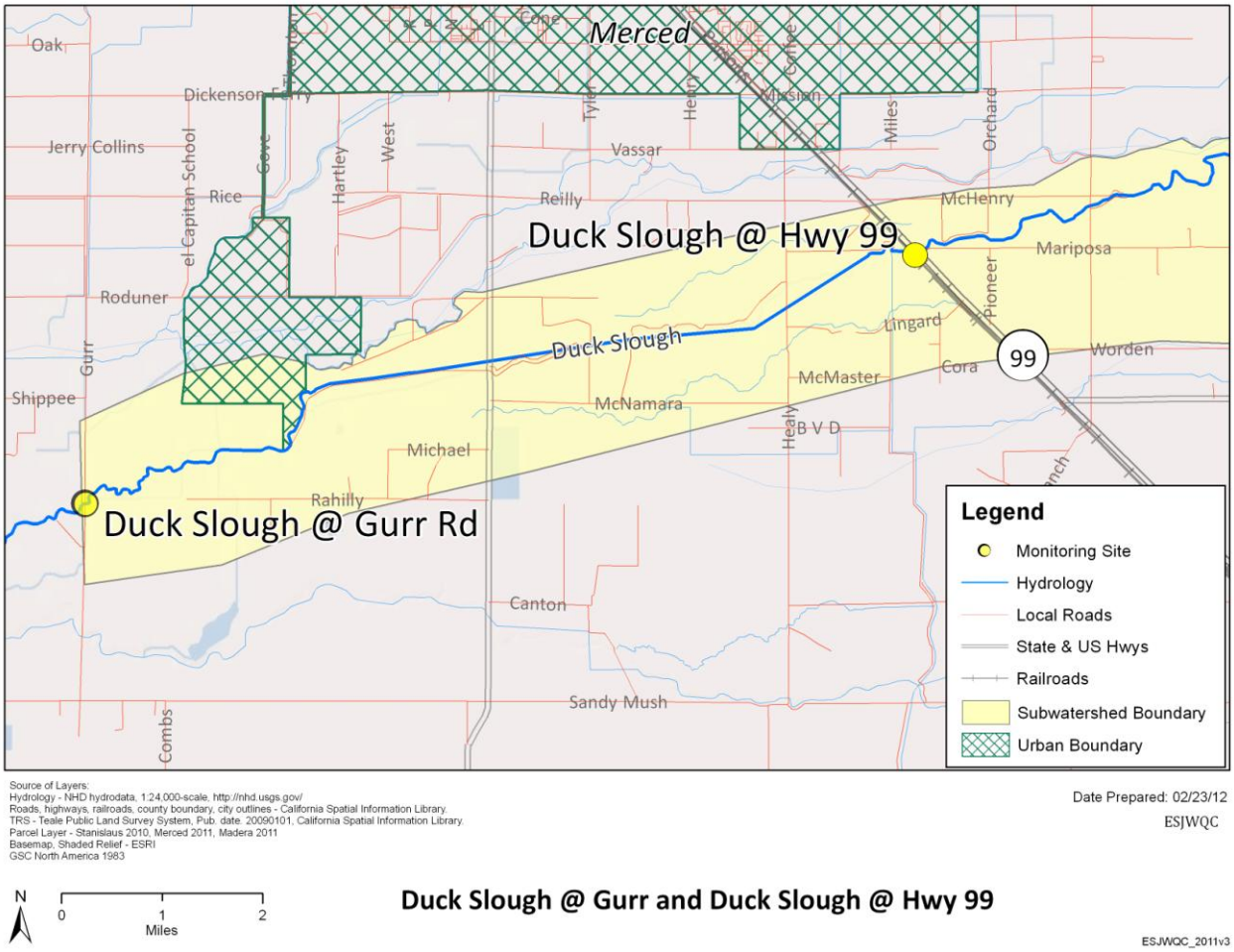
Figure 1. Duck Slough @ Hwy 99 and Duck Slough @ Gurr Rd Site Subwatershed locations.



Monitoring & Outreach

Sampling was initiated at Duck Slough @ Hwy 99 during the storm season of 2005 and continued through the end of the irrigation season of 2008 (under the 2006 MRPP). The site was monitored for Management Plan Monitoring (MPM) high priority constituents from 2007 through 2011 during months of past exceedances. The priority A/B-D management plan constituents in Duck Slough @ Hwy 99 include chlorpyrifos (A/B), copper (C), *Selenastrum capricornutum* water column toxicity (D), and DO, pH, *E. coli* and lead (E). All priority constituents in the Duck Slough @ Hwy 99 subwatershed are also priority constituents in the Duck Slough @ Gurr Rd subwatershed. Duck Slough @ Hwy 99 is scheduled for Assessment Monitoring in 2013 and 2014 (under the current 2008 MRPP). The last exceedance to occur of any constituent monitored was DO in June 2009.

The Duck Slough @ Hwy 99 site subwatershed is one of the Coalition's first set of high priority management plan subwatersheds and received focused outreach from 2008 through 2010. The Coalition identified growers with the potential to drain directly to the slough (including spray drift) and who had applied high priority constituents in the past. Twenty-four targeted growers farming approximately 4,016 acres were contacted in 2009, and the Coalition documented currently implemented management practices (pages 61-65 of MPUR submitted April 1, 2011) as well as encouraged implementation of additional management practices designed to address water quality impairments in Duck Slough. Twenty-two growers participated in follow up contacts. Of the management

practices recommended, growers most commonly installed discharge control systems and controlled outside nozzles when spraying outer rows next to sensitive sites (Table 1). The only other constituents under the Duck Slough @ Hwy 99 management plan that still require MPM are copper, lead, *E. coli* and pH. All management plan constituents at the Duck Slough @ Hwy 99 will be monitored for MPM at Duck Slough @ Gurr Rd during months of past exceedances.

Table 1. Comparison of recommended MPs and implemented MPs in Duck Slough @ Highway 99 subwatershed.

Management Practice (Separated by No Drainage vs Drainage)	Acreage: Recommended Practices	Acreage: Implemented Practices	Percent of Recommended Acreage with Implemented Practices
No irrigation drainage from property			
Drainage basins (sediment ponds)	42	0	0%
Install device to control discharge[1]	42	662[2]	1,576%
Recirculation - Tailwater return system	42	0	0%
Shut off outside nozzles when spraying outer rows next to sensitive sites	872	210	24%
Use air blast applications when wind is between 3-10 mph and upwind of a sensitive site	662	UA	UA
Total (no drainage)	**1,660**	**872**	**53%**
Yes, irrigation drainage from property			
Drainage basins (sediment ponds)	142	0	0%
Install device to control discharge	269	486[2]	181%
Recirculation - Tailwater return system	142	0	0%
Shut off outside nozzles when spraying outer rows next to sensitive sites	415	436[2]	105%
Spray areas close to waterbodies when the wind is blowing away from them	596	UA	UA
Use Polyacrylamide(PAM)	142	0	0%
Vegetation is planted or allowed to grow along ditches	21	0	0%
Microirrigation system	0	279[2]	NA
Reduce amount of water used in surface irrigation	0	764[2]	NA
Other (Not specified)[3]	0	451[2]	NA
Total (drainage)	**1,727**	**2,380**	**138%**
Total Acreage with 1 or more Recommended Practices			**3,387**
Total Acreage with 1 or More implemented Practices			**3,252**
Percent Of Implemented Practices compared to Recommended Acreage with 1 or More Implemented Practices			**96%**

[1] Practices apply to storm drainage
[2] Management practice not specifically recommended by Coalition representative for grower's operation
[3] If growers implemented management practices other than those asked about during Coalition follow-up, they were instructed to indicate so and provide a summary/explanation.
UA – Unanswered; Coalition did not ask about specific practice during follow up contact
NA – Not applicable; no recommendations for the management practice in the subwatershed and was not indicated as implemented by surveyed growers

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Figure 2. Duck Slough @ Hwy 99 Site Photos July 19, 2011 (before construction) & February 6, 2012 (beginning construction).

Upstream- east (before construction, July 19, 2011)

Upstream- east (beginning construction, February 6, 2012)

Downstream- west (before construction, July 19, 2011)

Downstream-west (beginning construction, February 6, 2012)

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Upstream- east (beginning construction, February 6, 2012)

South (beginning construction, February 6, 2012)

South (beginning construction, February 6, 2012)

Sincerely,

Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition