

**California Regional Water Quality Control Board
Central Coast Region**

**Total Maximum Daily Load for Fecal Indicator
Bacteria for the Cholame Creek Watershed, San
Luis Obispo and Monterey Counties, California**

**Final Project Report
April 2011**

Adopted by the
California Regional Water Quality Control Board
Central Coast Region
on May 17, 2011

and the
United States Environmental Protection Agency
on November 30, 2011

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http://www.waterboards.ca.gov/centralcoast/water_issues/programs/tmdl/303d_and_tmdl_projects.shtml

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List of Acronyms and Abbreviations

This report contains numerous acronyms and abbreviations. In general, staff wrote an acronym or abbreviation in parentheses following the first time a title or term was used. Staff wrote the acronym/abbreviation in place of that term from that point throughout this report. The following alphabetical list of acronyms/abbreviations used in this report is provided for the convenience of the reader:

| | |
|----------------|---|
| CalWater22 | CalWater22 is a suite of watershed data developed by the California Interagency Watershed Mapping Committee |
| CCAMP | Central Coast Ambient Monitoring Program |
| CEQA | California Environmental Quality Act |
| CFR | Code of Federal Regulations |
| CFS | Cubic Feet per Second |
| CFU | Colony Forming Units |
| CWA | Clean Water Act |
| DAR | Drainage Area Ratio |
| DHS | California Department of Health Services |
| DWR | California Department of Water Resources |
| <i>E. coli</i> | Escherichia coli bacteria |
| FIB | Fecal Indicator Bacteria |
| FMMP | Farmland Mapping and Monitoring Program |
| HSG | Hydrologic Soil Group |
| HUC | Hydrologic Unit Code |
| LA | Load Allocation |
| MPN | Most Probable Number |
| MS4 | Municipal Separate Storm Sewer System |
| NASS | National Agricultural Statistics Service |
| NCDC | National Climatic Data Center |
| NHD | National Hydrography Dataset |
| NPDES | National Pollutant Discharge Elimination System |
| NPS | Nonpoint Source |
| NRCS | Natural Resources Conservation Service |
| OSDS | Onsite Waste Disposal System |
| PRISM | Parameter-elevation Regressions on Independent Slopes Model |
| RCD | Resources Conservation District |
| REC-1 | Water Contact Recreation |
| REC-2 | Non-contact Water Recreation |
| SSURGO | Soil Survey Geographic Database |
| SWRCB | State Water Resources Control Board (State Board) |
| TMDL | Total Maximum Daily Load |
| USDA | United States Department of Agriculture |
| USEPA | United States Environmental Protection Agency |
| USGS | United States Geological Survey |
| Water Board | California Central Coast Regional Water Quality Control Board |
| WDR | Waste Discharge Requirements |
| WLA | Waste Load Allocation |
| WWTP | Waste Water Treatment Plant |

EXECUTIVE SUMMARY

Cholame Creek is located in a 237 square mile watershed in the coast ranges of southern Monterey County and northern San Luis Obispo County. Cholame Creek is a tributary of the Estrella River; the confluence of the creek with the Estrella River is at the town of Shandon. Cholame Creek is listed on Central Coast Region's Clean Water Act Section 303(d) List due to impairment by fecal coliform and *E. coli* bacteria. Consequently, water contact recreation beneficial uses are not being protected. Monitoring data from Cholame Creek show elevated fecal indicator bacteria concentrations, which may impair recreational uses of these waters; their tributaries; and/or their downstream receiving water bodies. Any current, potential, or future recreational uses in these water bodies which involve body contact (including but not limited to wading, fishing, etc.) and the possible ingestion of water could be a potential risk to human health because of the increased risk of the ingestion of disease-causing microbes (pathogens).

The following Fecal Indicator Bacteria Total Maximum Daily Load (TMDL) Project Report evaluates fecal indicator bacteria loading in Cholame Creek, evaluates what water bodies are affected by these TMDLs, estimations on where the bacteria are coming from, identifies responsible parties, and presents an implementation plan to reduce pollutants so that the waterbody is no longer impaired.

These TMDLs address the 303(d) listings of impairment due to fecal coliform and *E. coli* in Cholame Creek, WBID number CAR3170008120011127080727.

Total Maximum Daily Load (TMDL)

TMDLs are strategies to ensure attainment of water quality standards. They are implemented through existing regulatory and non-regulatory programs to control pollutant discharges from point sources (e.g., discharges from wastewater treatment plants) and nonpoint sources (e.g., runoff from livestock operations). The term Total Maximum Daily Load is used to describe the maximum amount of a pollutant(s) - in this case, fecal coliform bacteria - that a water body can receive and still meet water quality standards. A TMDL study identifies the probable sources of pollution, establishes the maximum amount of pollution a water body can receive and still meet water quality standards, and allocates that amount of pollution to all probable contributing sources.

The federal Clean Water Act requires every state to evaluate its waterbodies, and maintain a list of waters that are considered "impaired" either because the water exceeds water quality standards or does not achieve its designated use. California's water quality standards designate beneficial uses for each waterbody (e.g., drinking water supply, aquatic life support, recreation, etc) and the scientific criteria to support that use. The California Central Coast Water Board is required under both State Federal Law to protect and regulate beneficial uses of waters of the state. For each water on the Central Coast's "303(d) Impaired Waters List", the California Central Coast Water Board must develop and implement a plan to reduce pollutants so that the waterbody is no longer impaired and can be de-listed.

In the case of this TMDL project, water contact recreation is the most sensitive applicable beneficial use (i.e., most stringent numeric water quality standard). The loading capacity and allocations for this TMDL are therefore equal to the Basin Plan water quality objective (numeric target) for fecal coliform which is protective of all water contact activities. Additionally, this TMDL establishes a loading capacity, allocations, and numeric target for *Escherichia coli* (*E.*

coli) equal to USEPA guidance, which is protective of water contact activities. When the numeric water quality objectives for fecal coliform and USEPA guidance for *E. coli* are met, the TMDL is and applicable beneficial uses of the water bodies are considered restored.

The TMDLs established in this TMDL for fecal coliform and *E. coli* are as follows:

Fecal coliform

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400/100mL.

E. coli

Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of E. coli densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)

Impaired Waterbodies

Based on data from the Water Board's Central Coast Ambient Monitoring Program, Cholame Creek exceeded Basin Plan fecal coliform water quality objectives at the Cholame Creek monitoring site 317CHO in 14 out of 22 samples (64%). Additionally, the same monitoring site exceeded USEPA guidance for *E. coli* in 6 out of 13 samples (46%). Therefore, based on the State Water Quality Control Policy (SWRCB, 2004) Cholame Creek is impaired due to fecal coliform and *E. coli*.

Sources

Fecal coliform are shed by all warm-blooded animals including humans, pets, livestock and birds and other wildlife. Sources identified in this TMDL Report include:

| Source Category | Land Use Category |
|-----------------|--------------------|
| Livestock | Rangeland, Pasture |
| Wildlife | All |

Numeric Targets

Fecal coliform is used as an indicator for fecal waste and the potential for pathogens in the water column in this TMDL because the Central Coast Basin Plan explicitly specifies water quality objectives for fecal coliform. This FIB TMDL Report proposes that all waterbodies achieve a level of bacteria concentration that is safe for human contact recreation. The following are current Central Coast Basin Plan standards or USEPA guidance and are used as numeric targets in this FIB TMDL:

Fecal coliform

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN per 100 mL, nor shall more than 10 percent of samples collected during any 30-day period exceed 400 MPN per 100 mL.

E. coli

Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of E. coli densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using

the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)

Allocations

The table below identifies the allocations assigned to responsible parties and the affected water bodies; this table is also presented and discussed in Section 5.4.

| WASTE LOAD ALLOCATIONS | | | |
|---|----------------------------------|---|---|
| <u>Waterbody</u> | <u>WBID</u> | <u>Party Responsible for Allocation (Source) NPDES/WDR number</u> | <u>Receiving Water Fecal Coliform (MPN/100mL)</u> |
| <u>All impaired water bodies^a</u> | <u>CAR3170008120011127080727</u> | <u>NONE IDENTIFIED</u> | <u>NOT APPLICABLE</u> |
| LOAD ALLOCATIONS | | | |
| <u>Waterbody</u> | <u>WBID</u> | <u>Responsible Party (Source)</u> | <u>Receiving Water Fecal Coliform (MPN/100mL)</u> |
| <u>All impaired water bodies^a</u> | <u>CAR3170008120011127080727</u> | <u>Owners/operators of land used for/containing domestic animals/livestock (Domestic animals/livestock waste)</u> | <u>Allocation-1 Allocation-2</u> |
| <u>All impaired water bodies^a</u> | <u>CAR3170008120011127080727</u> | <u>No responsible party (Natural sources)</u> | <u>Allocation-1 Allocation-2</u> |
| <u>Wasteload Allocation: None – not applicable.</u> | | | |
| <u>Load Allocation – Allocation-1: (Equal to the TMDL):Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400 MPN/100 mL.</u> | | | |
| <u>Load Allocation – Allocation-2: (Equal to the TMDL for <i>E. coli</i>): Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of <i>E. coli</i> densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)</u> | | | |

^a Chalome Creek: all reaches of the creek and all tributaries of the waterbody upstream of monitoring site 317CHO. If and when water quality data becomes available and confirms impairment in Chalome Creek just upstream of the confluence with the Estrella River, then the TMDL will apply to all tributaries of Chalome Creek to the confluence with the Estrella River.

TMDL Implementation

TMDLs are strategies to restore clean water. Implementation plans specify actions needed to solve the problem, and are required under California Law. Implementation measures aimed at improving water quality are implemented, where appropriate, by responsible parties. A responsible party is an entity or an individual who's operations or property have been identified as a probable source of fecal coliform pollution.

In accordance with the California Impaired Waters policy the Water Board may exercise its independent discretion to certify that a nonregulatory action will correct the impairment if supported by findings in the record. On these occasions the Water Board may not always need to adopt its own implementation program, but may instead rely upon the program adopted

by the other entity. When doing so, the Water Board should establish the TMDL via a formal recognition which certifies that Water Board has determined that the other entity's program will comply with the TMDL and attain standards.

While the State Impaired Waters policy recognizes that certification of alternative programs of implementation may be merited as appropriate and as a matter of efficiency, it is important to emphasize the Water Board retains the authority to commence a regulatory response if an impairment has not been adequately addressed by a non-regulatory action within a specified time period. The Water Board may not indefinitely defer taking necessary action if another entity is not properly addressing a problem. Note that a regulatory response by the Water Board must use the administrative permitting authorities as outlined in the Nonpoint Source Implementation and Enforcement policy (see Section 6.3.3).

Accordingly, staff proposes that the Water Board certify the California Rangeland Water Quality Management Plan (Rangeland Plan) as the mechanism for implementing this TMDL. The Rangeland Plan was accepted by the State Board in 1995 (SWRCB Resolution No. 95-43). It summarizes authorities and mandates for water quality and watershed protection on non-federal rangelands, and specifies a framework for the cooperative development of ranch management strategies for water quality protection. The Rangeland Plan also provides that where beneficial uses of water are impaired or threatened, as determined by the Water Board, ranch owners shall assess and report to the Water Board the impact of their operations on beneficial uses; and show the existence of a viable Rangeland Plan with implementation underway; or schedule an assessment and begin development of a Rangeland Plan.

As such, the implementation process will include the following.

- 1) By five years after final approval of the TMDL, Water Board staff and stakeholders will identify specific sites within the TMDL project area contributing controllable fecal coliform loads to Cholame Creek that need management measures for pathogen control. Problem assessment and planning for management measure implementation on non-federal rangelands will follow the implementation procedures in the California Rangeland Water Quality Management Plan (July 1995).
- 2) By eight years after final approval of the TMDL, depending on progress toward management measure implementation under the 1995 California Rangeland Water Quality Management Plan and the 2000 California Nonpoint Source Plan, staff will consider the need for regulatory action to ensure implementation of management measures to control external sources of fecal coliform loading to Cholame Creek.
- 3) By 12 years from the date the TMDL becomes effective (which is upon approval by the Water Board), management practices will be fully implemented for nonpoint sources of fecal coliform loading and the load the allocations, and therefore the TMDL, will be achieved

Water Board staff will verify implementation of the California Rangeland Water Quality Management Plan via a program of implementation monitoring and water quality monitoring, as described in Section 6.5 of this Project Report.

Timeline to Achieve TMDL

Staff anticipates that the allocations, and therefore the TMDL, will be achieved 12 years from the date the TMDL becomes effective (which is upon approval by the Water Board). This estimation is in part based on the amount of time necessary to identifying responsible parties of the TMDL. The estimation is also based on the uncertainty of the time required for in-stream water quality improvements resulting from management practices to be realized. Staff anticipates that the full in-stream positive effect of all the management measures will be realized gradually.

The Central Coast Water Board will consider additional requirements, or commence a regulatory response in accordance with the State Nonpoint Source Implementation and Enforcement policy if implementation of management practices do not result in achievement of water quality objectives.

1 INTRODUCTION

1.1 Clean Water Act Section 303(d) List

Section 303(d) of the federal Clean Water Act requires every state to evaluate its waterbodies, and maintain a list of waters that are considered “impaired” either because the water exceeds water quality standards or does not achieve its designated use. For each water on the Central Coast’s “303(d) Impaired Waters List”, the California Central Coast Water Board must develop and implement a plan to reduce pollutants so that the waterbody is no longer impaired and can be de-listed. Section 303(d) of the Clean Water Act states:

Each State shall establish for the waters identified in paragraph (1)(A) of this subsection, and in accordance with the priority ranking, the total maximum daily load, for those pollutants which the Administrator identifies under section 1314(a)(2) of this title as suitable for such calculation. Such load shall be established at a level necessary to implement the applicable water quality standards with seasonal variations and a margin of safety which takes into account any lack of knowledge concerning the relationship between effluent limitations and water quality.

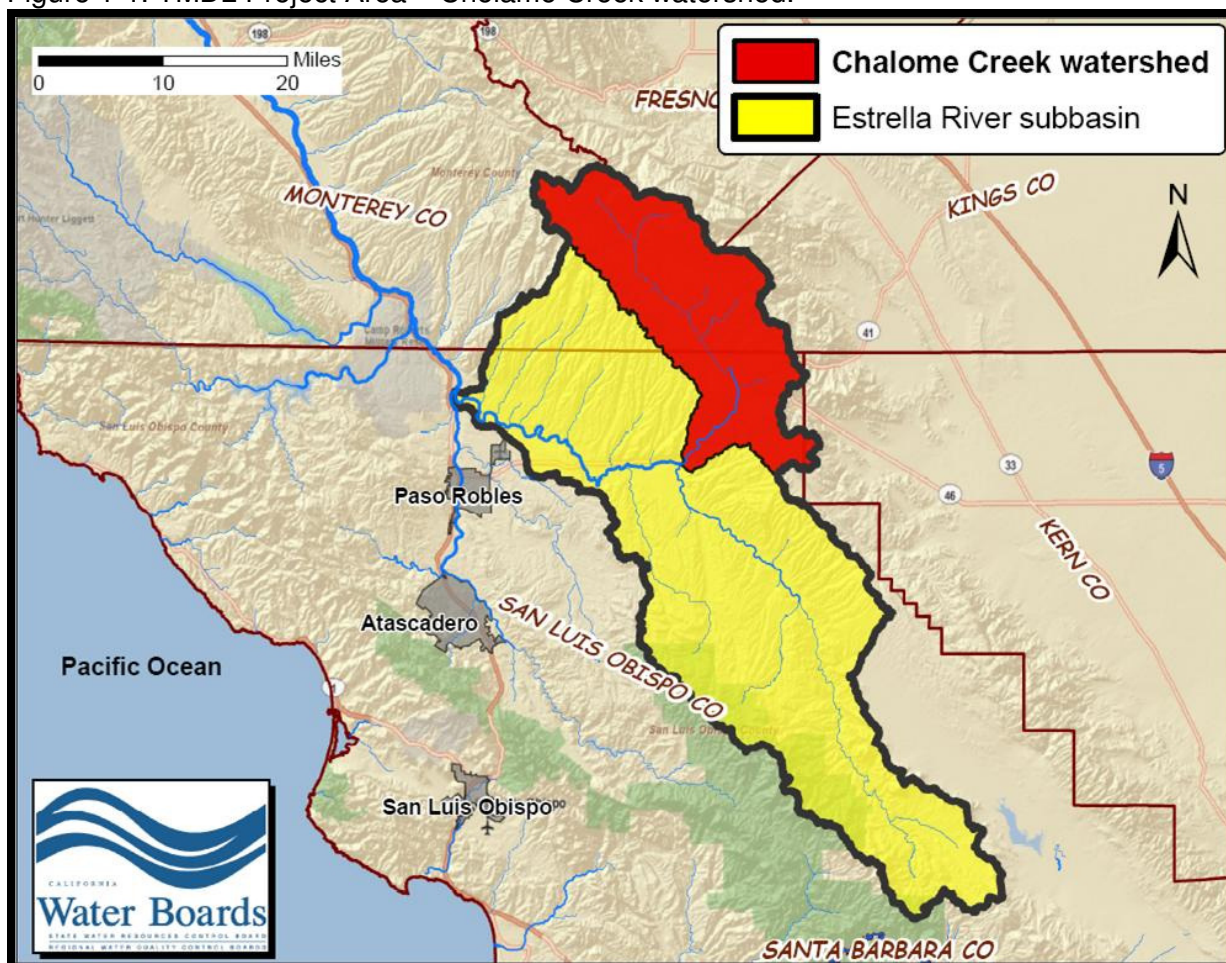
The State complies with this requirement by periodically assessing the conditions of the rivers, lakes and bays and identifying them as “impaired” if they do not meet water quality standards. These waters, and the pollutant or condition causing the impairment, are placed on the 303(d) List of Impaired Waters. In addition to creating this list of waterbodies not meeting water quality standards, the Clean Water Act mandates each state to develop TMDLs for each waterbody listed. The Central Coast Regional Water Quality Control Board is the agency responsible for protecting water quality consistent with the Basin Plan, including developing TMDLs for waterbodies identified as not meeting water quality objectives.

1.2 Project Area

The proposed geographic scope of this TMDL (the project area) encompasses 237 square miles of the Cholame Creek watershed (Hydrologic Unit Code 1806000402) located the coast ranges of southern Monterey County and northern San Luis Obispo County. Cholame Creek is a tributary of the Estrella River. The project area¹ includes the watershed area contributing flow to the Cholame Creek, and downstream to the Cholame Creek’s confluence with the Estrella River. Figure 1-1 illustrates the location of the project area.

¹ The terms “project area” and “Cholame Creek watershed” are synonymous in the context of this report, and the terms are therefore used interchangeably.

Figure 1-1. TMDL Project Area – Cholame Creek watershed.



1.3 Pollutants Addressed

The pollutant addressed in this TMDL is fecal waste. Pathogenic microbes are associated with fecal waste. Pathogens include viruses, protozoa, and pathogenic strains of bacteria. These microbes can cause a variety of diseases or illnesses (hepatitis, cholera, parasites, diarrhea, etc.) through ingestion of contaminated water or the consumption of contaminated shellfish. The presence of fecal waste in the water column is measured by taking water and analyzing those samples for the concentration of total coliform, fecal coliform and/or *E. coli*. These constituents will collectively be referred to as fecal indicator bacteria or FIB. FIB is used to determine the most probable number of fecal indicator bacteria in the water at a given time. This number is used to determine the risk associated with recreating in this water. Reducing the amount of fecal waste that enters a water body will help to preserve and maintain the beneficial uses.

2 PROBLEM IDENTIFICATION

2.1 Watershed Description

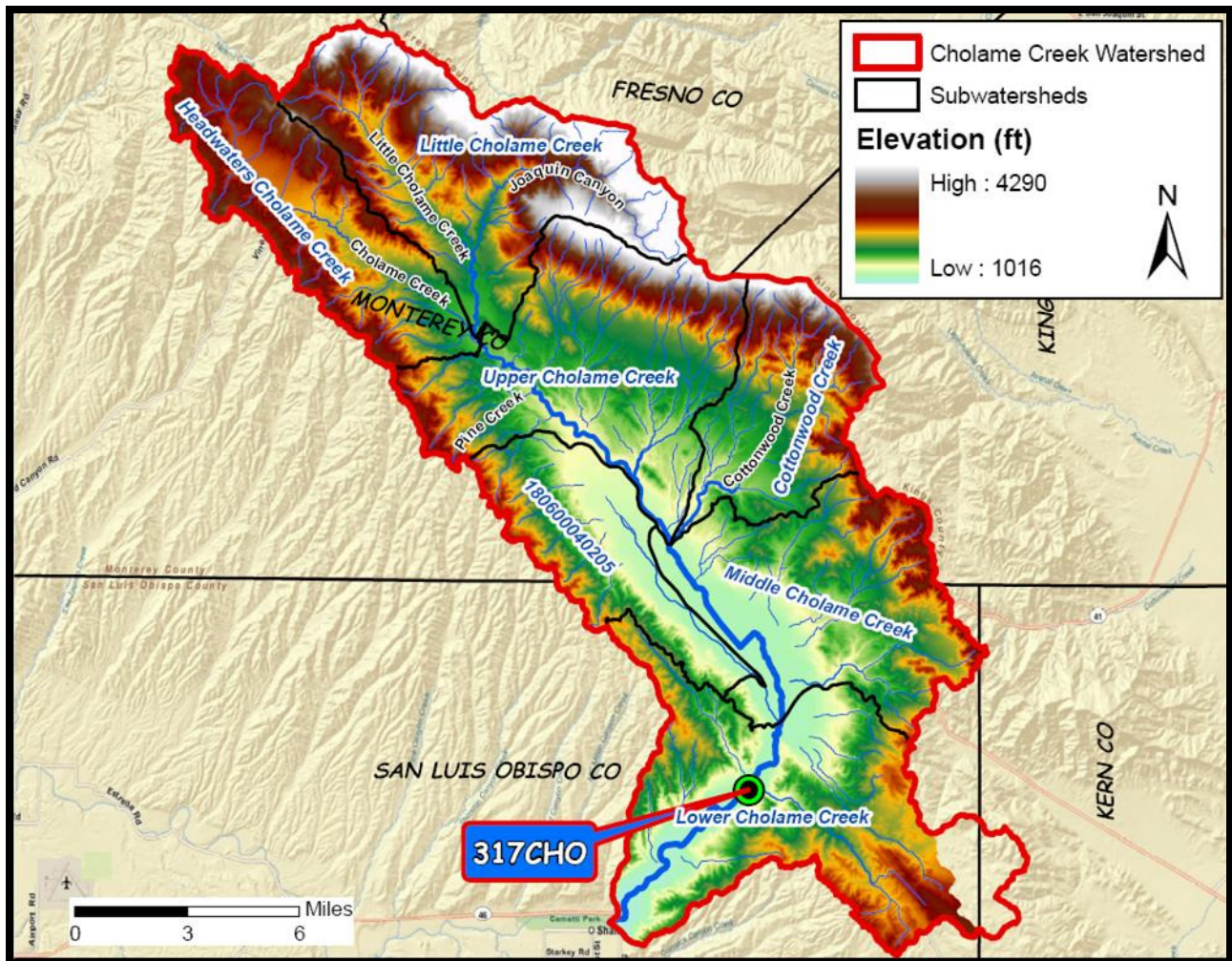
Cholame Creek is located in a 237 square mile, northwest-southeast trending watershed in the coast ranges of southern Monterey County and northern San Luis Obispo County. Cholame

Creek is a tributary of the Estrella River; the confluence of the creek with the Estrella River is at the town of Shandon. The Cholame Creek watershed is in a lightly-populated rural setting. The creek drains an alluvial valley and surrounding mountains within an ecosystem characterized grassland, chaparral, oak woodland, and sagebrush (source: National Land Cover Dataset, 2001; Calif. Dept. of Forestry and Fire Protection, 1977) and minor amounts of cropland, primarily grain or hay crops (source, Calif. Department of Water Resources, 1997)

2.1.1 Watershed Delineation

ESRI™ ArcMap® 9.2 was used to create a watershed layer for the project area. The drainage boundaries of the Project Area were delineated on the basis of the Watershed Boundary Dataset, which contain digital hydrologic unit boundary layers organized on the basis of Hydrologic Unit Codes (HUCs). Cholame Creek watershed - HUC 1806000402– encompasses 237 square miles of southern Monterey County and northern San Luis Obispo County. Figure 2-1 illustrates a relief map of Cholame Creek watershed, and the subwatersheds nested within it.

Figure 2-1. Project Area relief map, subwatersheds, and location of water quality monitoring site 317CHO.



2.1.2 Land Use and Land Cover

Land use and land cover in the project area can be evaluated from digital data provided by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). The FMMP digital land use dataset was compiled by the California Dept. of Conservation, in cooperation with the California Cattlemen's Association and others. For this Project Report, the 2008 FMMP mapping data for Monterey and San Luis Obispo counties were used. Figure 2-2 illustrates land use and land cover in the project area. Table 2-1 tabulates the distribution of land use in the project area.

It is worth noting with regard to spatial data and census data used throughout this Project Report that these types of datasets are widely used in TMDL studies for scoping purposes and are not intended or required to accurately represent the full range of local conditions or site-specific real time conditions.

Figure 2-2. Land Use – Land Cover in Cholame Creek watershed (source: FMMP, 2008).

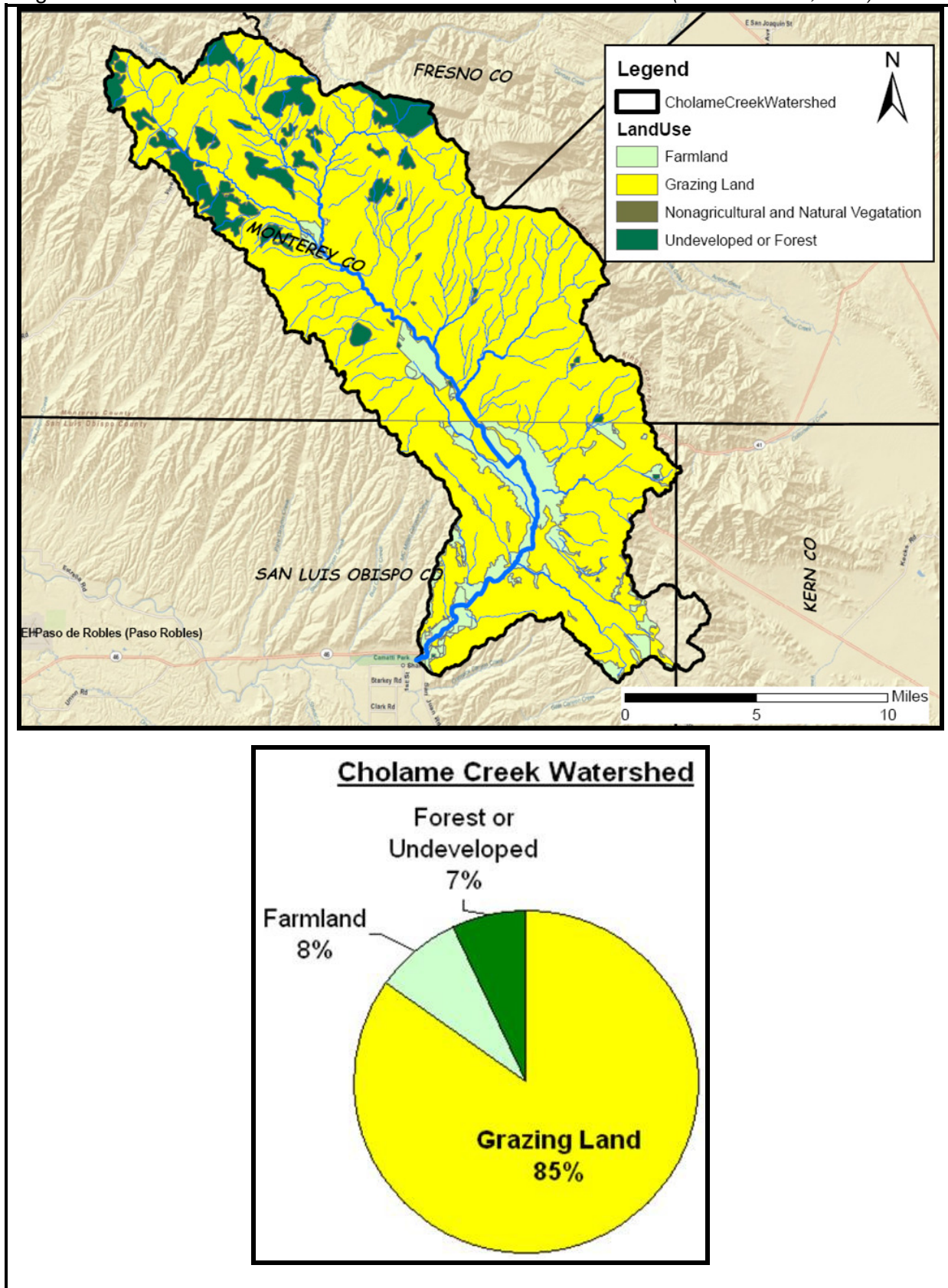


Table 2-1. Tabulation of Cholame Creek watershed land use / land cover.

| Land Use/Land Cover | Acres | % of Project Area |
|-----------------------|---------------|-------------------|
| Residential | 100 | 0.1% |
| Grazing Land | 128276 | 84.6% |
| Farmland | 12704 | 8.4% |
| Forest or Undeveloped | 10607 | 7% |
| Total | 151697 | 100% |

2.1.3 Hydrology

Cholame Creek does not have flow gage records. A synthetic flow record for Cholame Creek at monitoring site 317CHO was developed in conjunction with flow records from USGS 11224500 at Los Gatos Creek as a reference flow gage, as described in Appendix B: *Synthetic Flow Record*.

Figure 2-3 illustrates the flow duration curve for Cholame Creek at monitoring site 317CHO. Flow duration curves are graphical representations of the flow regime of a stream at a given site. The horizontal axis is essentially a flow frequency distribution, depicting the percentage of times a certain flow is exceeded on a daily basis. As such, highest flows are represented on the extreme left side of the horizontal axis, lowest flows recorded are represented the extreme right side of the axis. The median flow occurs at a flow exceedance frequency of 50 percent.

Figure 2-4 illustrates the hydrologic stream channel classifications in the project area. The source of these hydrologic classification attributes is from the USGS’s high resolution National Hydrography Dataset (NHD).

Figure 2-3. Flow duration curve for Cholame Creek.

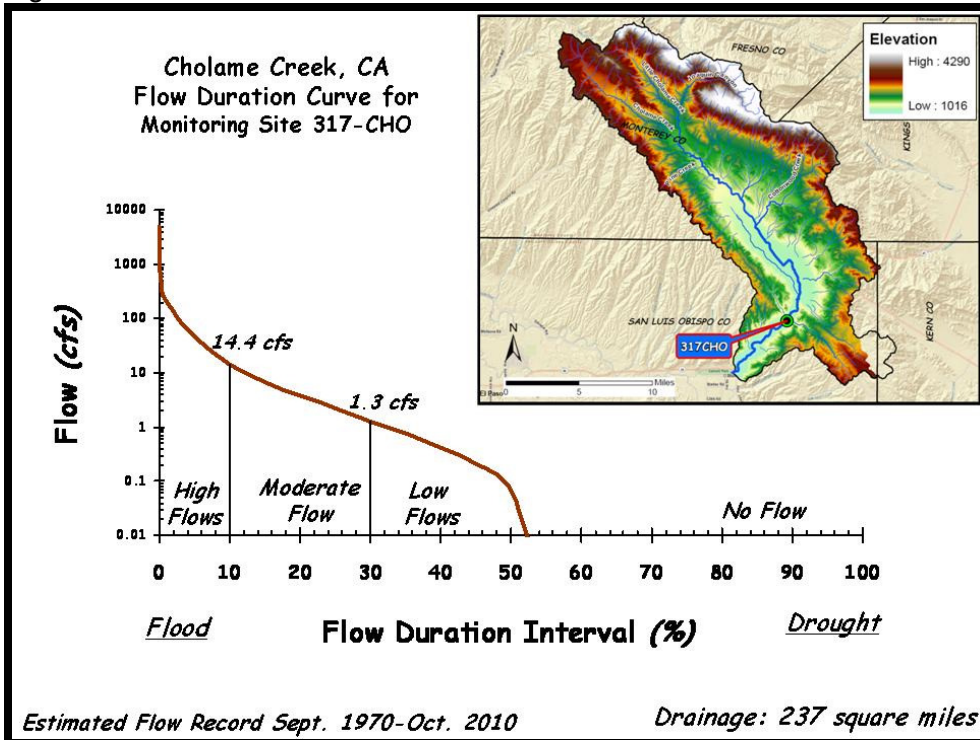
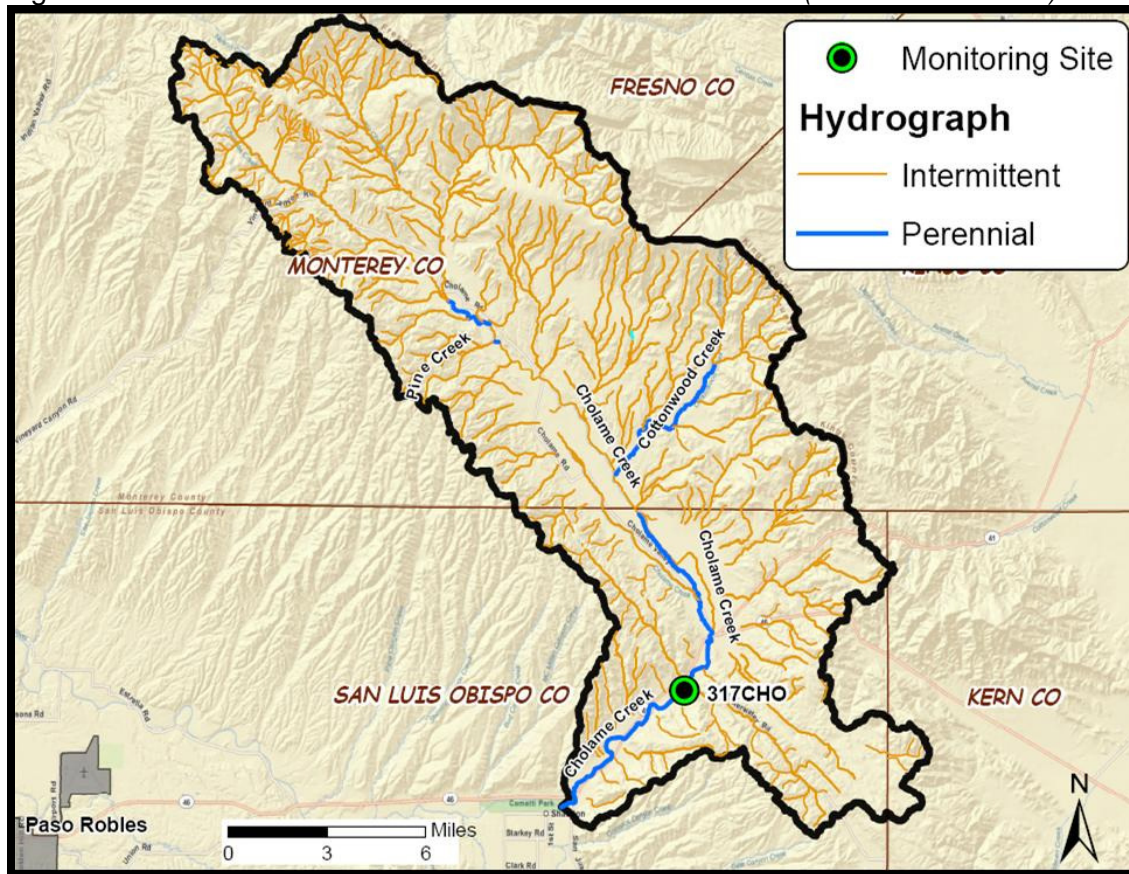


Figure 2-4. Flow conditions in the Cholame Creek watershed (source: USGS-NHD).



In central coast streams, pathogen loading in ephemeral or intermittent drainages is typically limited to the wet season or to precipitation events. Nonetheless, it is also important to recognize that indicator bacteria (e.g., *E. coli*) or pathogens in manure that are deposited on grasses or in ephemeral stream beds may survive for weeks or months (Guan and Holley, 2003; Avery et al., 2004), potentially being mobilized in the water column by subsequent stream flows.

2.1.4 Climate and Precipitation

Precipitation data can be used, in conjunction with other physical metrics, to estimate flow for ungaged streams. For example the California State Water Resources Control Board (SWRCB) uses a precipitation-based proration method to estimate flow at ungaged streams (SWRCB, 2002).

The Cholame Creek watershed has a dry, Mediterranean climate, with the vast majority of precipitation falling between November and April. Precipitation gage data in the vicinity of the project area is available from the National Oceanographic and Atmospheric Administration - Western Regional Climate Center (<http://www.wrcc.dri.edu>). As shown in Table 2-3 the mean annual precipitation for National Climatic Data Center (NCDC) weather station 046703, located near Parkfield, CA is 14.51 inches per year.

Table 2-2. Precipitation record for NCDC weather station 041034.

| NCDC Weather Station 046703 – Parkfield, CA | | | | | | | | | | | | | |
|---|------|------|------|------|------|------|------|------|------|------|------|------|--------|
| Period of Record: Feb. 1943 to Feb. 1975 | | | | | | | | | | | | | |
| | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec | Annual |
| Average Total Precipitation (in.) | 2.90 | 2.68 | 2.10 | 1.29 | 0.35 | 0.02 | 0.03 | 0.00 | 0.15 | 0.46 | 1.79 | 2.73 | 14.51 |

It is important to recognize that rainfall gauging stations have limited spatial distribution, and that gauging stations tend to be located in urban areas or valley floor areas. Consequently, these locations can bias estimates of regional rainfall towards climatic conditions at lower elevations. The topography of the California central coast region however, can result in significant orographic enhancement of rainfall (i.e., enhancement of rainfall due to topographic relief and mountainous terrain).

Therefore, mean annual precipitation estimates for the project area may be assessed using the Parameter-elevation Regressions on Independent Slopes Model (PRISM) (<http://prism.oregonstate.edu/>). PRISM is a climate mapping system that accounts for orographic climatic effects and is widely used in watershed studies and TMDL projects to make projections of precipitation into rural or mountainous areas where rain gage data is often absent, or sparse. An isohyetal map for estimated mean annual precipitation in the Cholame Creek watershed based on PRISM data is presented in Appendix C:

2.1.5 Geology and Soils

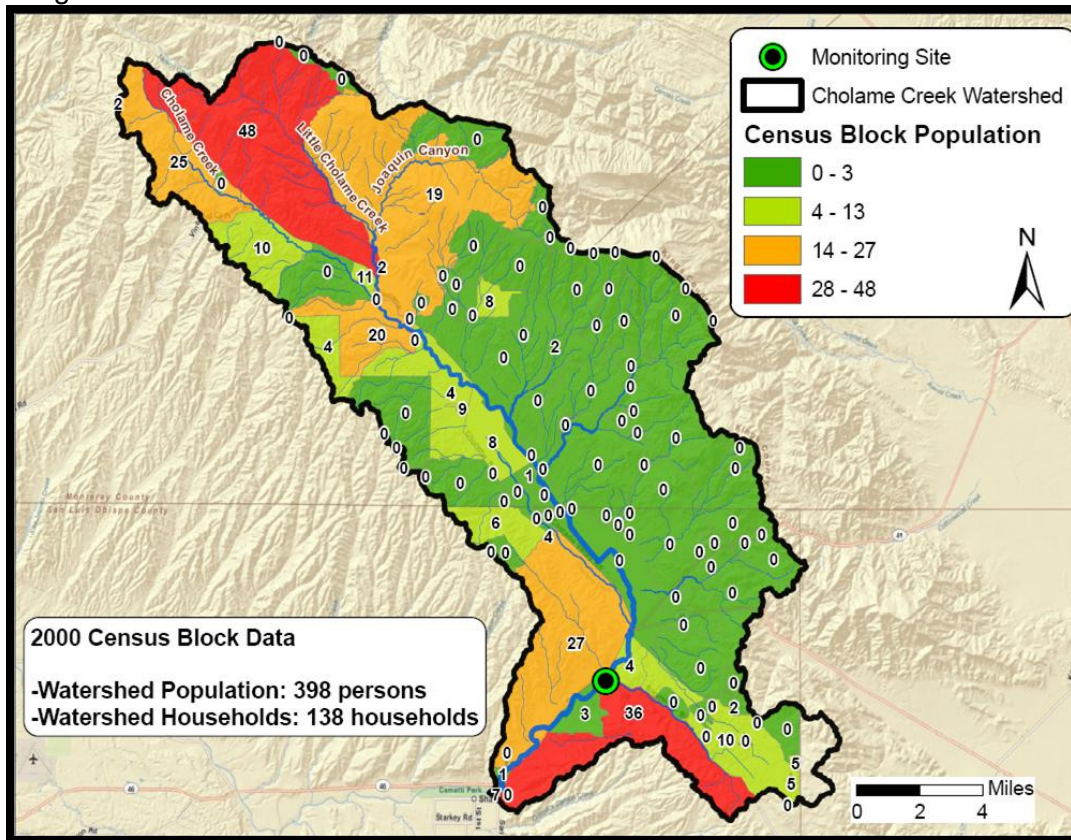
Soils and rocks have physical and hydrologic characteristics which may have a significant influence on the transport and fate of pollutants. For pathogen TMDLs, geology and soils information may be important in terms of assessing the potential risk of OSDS (i.e., septic tanks) effluent transport through bedrock fractures, the risk of pollutant wash-off associated with poorly-drained or relatively impermeable soils, or the potential for sediment-associated bacteria loads.

Digital data for California geology is available from the California Department of Conservation, Division of Mines and Geology. The digital database contains the geologic units and faults as shown on the Geologic Map of California by Charles W. Jennings published in 1977. Soil surveys for Monterey County are compiled by the U.S. Department of Agriculture National Resources Conservation Service (NRCS) and are available via the Soil Survey Geographic (SSURGO) Database. The distribution of geology and of hydrologic soil groups in the Project Area along with a tabular description of the soil group's hydrologic properties is presented in Appendix C: .

2.1.6 Demographics

To estimate the potential contribution of human fecal material (for example, failing septic systems) to surface water pathogen impairments, it is necessary to have watershed-specific demographic data on the number of people, households, and septic systems in the project area. Section 4.1 provides detail on the sources of census data that are used to establish these estimates. Figure 2-5 presents the estimated population distribution in the watershed. As indicated in the figure, the Cholame Creek Watershed is a rural setting with a relatively small human population of approximately 400 people and an estimated 138 households.

Figure 2-5. Census Block Data.



2.2 Beneficial Uses

California’s water quality standards designate beneficial uses for each waterbody (e.g., drinking water supply, aquatic life support, recreation, etc) and the scientific criteria to support that use. The California Central Coast Water Board is required under both State Federal Law to protect and regulate beneficial uses of waters of the state. In the case of this TMDL project, water contact recreation (REC-1) is the most sensitive water recreation use, i.e. more stringent numeric water quality objectives for fecal indicator bacteria. The REC-1 beneficial use states:

“Uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and scuba diving, surfing, white water activities, fishing, or use of natural hot springs.”

Table 2-3 shows the current beneficial use designations for major water bodies in the Project area.

Table 2-3. Beneficial uses of Cholame Creek.

| Beneficial Use | Cholame Creek |
|----------------|---------------|
| MUN | X |
| AGR | X |
| PRO | |

| Beneficial Use | Cholame Creek |
|----------------|---------------|
| IND | |
| GWR | X |
| REC1 | X |
| REC2 | X |
| WILD | X |
| COLD | |
| WARM | X |
| MIGR | |
| SPWN | |
| BIOL | |
| RARE | X |
| EST | |
| FRESH | |
| COMM | X |
| SHELL | |

MUN: Municipal and domestic water supply.

AGR: Agricultural supply.

PRO: Industrial process supply.

IND: Industrial service supply

GWR: Ground water recharge.

REC1: Water contact recreation.

REC2: Non-Contact water recreation.

WILD: Wildlife habitat.

COLD: Cold fresh water habitat.

WARM: Warm fresh water habitat

MIGR: Migration of aquatic organisms.

SPWN: Spawning, reproduction, and/or early development.

BIOL: Preservation of biological habitats of special significance.

RARE: Rare, threatened, or endangered species

EST: Estuarine habitat

FRESH: Freshwater replenishment.

COMM: Commercial and sport fishing.

SHELL: Shellfish harvesting.

2.3 Water Quality Objectives and Criteria

The Central Coast Region's Water Quality Control Plan (Basin Plan) contains specific water quality objectives that apply to indicator bacteria (CCRWQCB, 1994, pg. III-3). These objectives are linked to specific beneficial uses and include:

2.3.1 Shellfish Harvesting (SHELL):

Please note: The Cholame Creek and its tributaries are not designated for the SHELL beneficial use; as such the SHELL water quality objective for fecal coliform does not apply in this TMDL project.

2.3.2 Water Contact Recreation (REC-1):

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 per 100ml, nor shall more than 10% of total samples during any 30-day period exceed 400 per 100ml.

2.3.3 Non-Contact Water Recreation (REC-2):

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 2000 per 100ml, nor shall more than 10% of samples collected during any 30-day period exceed 4000 per 100ml.

2.3.4 Controllable Water Quality conditions

Controllable water quality must conform to the water quality objectives stated in the Basin Plan. The Basin Plan defines controllable water quality conditions as:

“Controllable water quality conditions are those actions or circumstances resulting from man’s activities that may influence the quality of the waters of the State and that may be reasonably controlled.”

2.4 Data Analysis

The data used for this Project included water quality data from the Central Coast Ambient Monitoring Program. CCAMP is the Central Coast Water Board’s regionally scaled water quality monitoring and assessment program. The CCAMP dataset used for this project ranged in time from two sampling cycles: February 1999 to March May 2000 and January 2006 to February 2007.

In the case of this TMDL project, contact recreation (REC-1) is the most sensitive applicable beneficial use. The REC-1 water quality objective is therefore protective of all designated beneficial uses of Cholame Creek pertaining to indicator bacteria. Accordingly, the water quality objective to assess impairment status for this TMDL project is equal to the REC-1 water quality objective (numeric target) for fecal coliform. The Basin Plan’s water quality objective for waters designated for REC-1 is:

“Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 per 100ml, nor shall more than 10% of total samples during any 30-day period exceed 400 per 100ml.”

Available datasets often do not contain five samples in a 30-day period, so the portion of the objective that is evaluated is that “no more than ten percent of total samples during any 30-day period exceed 400/100 mL.” In instances where fewer than five samples were collected in 30 days, the “ten percent” threshold is exceeded if any one sample exceeds 400/100 mL.

2.4.1 Water Quality Impairments

The California Listing Policy (SWRCB, 2004) provides standards for interpreting data and information as they are compared to beneficial uses and existing numeric and narrative water quality objectives. In the absence of a site-specific exceedance frequency (e.g., five samples in a 30-day period), a water segment shall be placed on the section 303(d) list if bacteria water quality objectives are exceeded at the frequencies and sample sizes indicated in Table 2-4.

Table 2-4. Data required to assert impairment (source: SWRCB, 2004).

| Sample Size | Number of Exceedances ¹ needed to assert impairment |
|-------------|--|
| 5-30 | 5 |
| 31-36 | 6 |
| 37-42 | 7 |
| 43-48 | 8 |

| Sample Size | Number of Exceedances ¹ needed to assert impairment |
|-------------|---|
| 49-54 | 9 |
| 55-60 | 10 |
| 61-66 | 11 |
| 67-72 | 12 |
| 73-78 | 13 |
| 79-84 | 14 |
| 85-91 | 15 |
| 92-97 | 16 |
| 98-103 | 17 |
| 104-109 | 18 |
| 110-115 | 19 |
| 116-121 | 20 |

¹ Equal to or greater than 400 MPN/100 ml fecal coliform.

Recent monitoring data collected in Cholame Creek measures *Escherichia coli* indicator bacteria. *Escherichia coli* (*E. coli*) is one species within the broader category of fecal coliform bacteria. *E. coli* data was collected by CCAMP in the 2006-07 monitoring cycle of Cholame Creek. Table 2-5 summarizes USEPA recommended bacterial water quality criteria for the protection of human health in recreational waters.

Table 2-5. USEPA recommended criteria for *E. coli*.

| Indicator | Risk Level | Geometric Mean Density (per 100 mL) | Single Sample Maximum Allowable Density (per 100 mL) ^a | | | |
|----------------|------------|-------------------------------------|---|---|---|--|
| | | | Designated Beach Area (75 th percentile) | Moderate Full Body Contact Recreation (82 nd percentile) | Lightly Used Full Body Contact Recreation (90 th percentile) | Infrequently Used Full Body Contact Recreation (95 th percentile) |
| <i>E. coli</i> | 8 | 126 ^b | 235 | 298 | 409 | 575 |

Source: U.S. EPA (1986).
a. Calculated using the following: single sample maximum = geometric mean * 10^{^(confidence level factor * log standard deviation)}, where the confidence level factor is: 75%: 0.675; 82%: 0.935; 90%: 1.28; 95%: 1.65. The log standard deviation from EPA's epidemiological studies is 0.4 for fresh waters.
b. Calculated to nearest whole number using equation: $\text{geometric mean} = \text{antilog}_{10} [(\text{risk level} + 11.74) / 9.40]$.

USEPA recommends that California use USEPA's Ambient Water Quality Criteria for Bacteria (1986) when there is no adopted *E. coli* standard (USEPA, 2010). Specifically, USEPA recommends that for REC1 uses the following criteria be used:

Steady state geometric mean indicator density - 126 indicator densities/100ml
Designated beach area (upper 75% confidence limit) - 235 indicator densities/100ml (EPA, 1986, Table 4, pp.15)

Additionally, USEPA has provided guidance in using the recommended *E. coli* criteria to evaluate whether water bodies are impaired (Mary Adams, Central Coast Water Board, December 2007, personal communication). USEPA recommends using the concentration of 235 MPN/100mL as a benchmark, with the number of exceedances of 235 MPN/100mL needed to assert impairment increasing with the number of available data. Note from Table 2-4 that at least five data and exceedances are required to assert impairment. Accordingly, Table 2-6 summarizes the number and percent of samples that exceeded water quality criteria for fecal coliform and *E. coli* in Cholame Creek.

Table 2-6. Fecal Indicator Bacteria samples exceeding water quality objectives.

| Waterbody | Fecal Coliform Exceedances | |
|------------------------|---|--------------------------------------|
| | Number of Samples Exceeding 400 MPN/100mL | % of Samples Exceeding 400 MPN/100mL |
| Cholame Creek @ 317CHO | 14 of 22 | 64% |
| | E. Coli Exceedances | |
| | Number of Samples Exceeding 235 MPN/100mL | % of Samples Exceeding 235 MPN/100mL |
| | 6 of 13 | 46% |

Figure 2-6 presents a statistical summary of the water quality data for fecal coliform at monitoring site 317CHO. The box and whiskers plot illustrates a statistical representation of the data and indicates that the nature of the fecal coliform impairment is qualitatively moderate, and not routine or severe.

Figure 2-6. Statistical summary of fecal indicator bacteria water quality data.

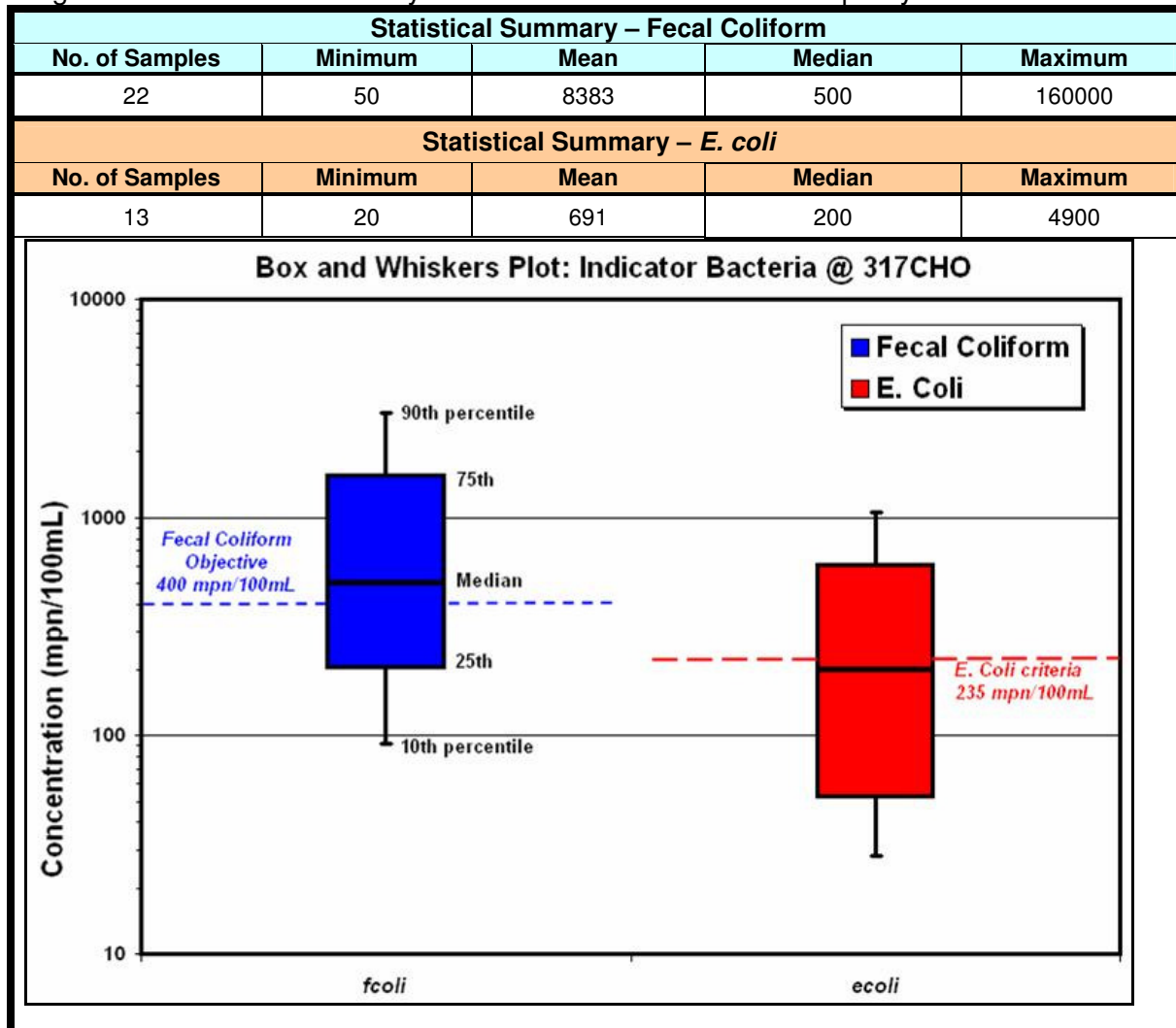


Table 2-7 presents staff's conclusions regarding impairment status. Cholame Creek is confirmed by staff as an impaired water body due to fecal coliform and *e. coli* indicator bacteria, and is also currently listed as impaired on the 2010 303(d) list.

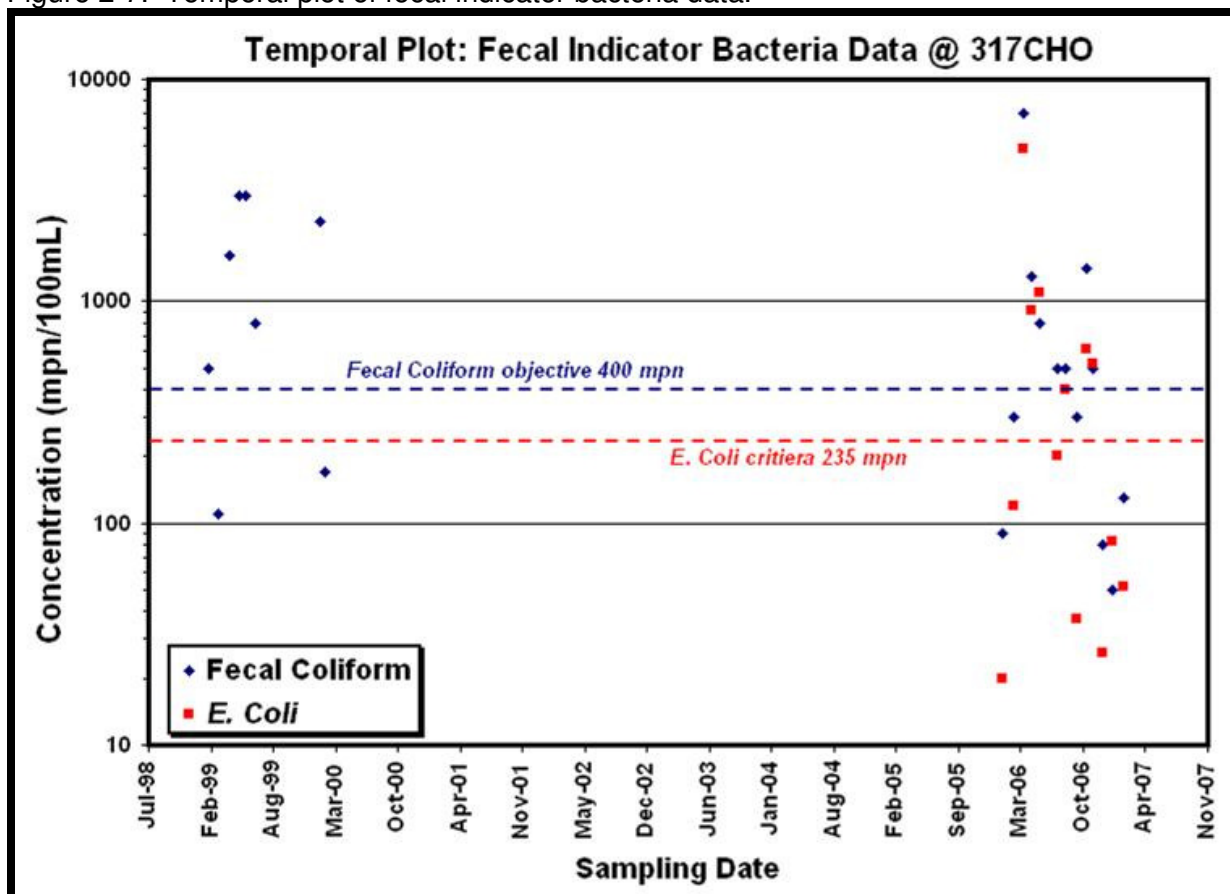
Table 2-7. Confirmed impaired waterbodies.

| Waterbody | Waterbody Identification (WBID) | Exceeding a water quality objective or recommended level? | Water quality objective or USEPA criteria exceeded? | | Currently listed on 303(d) list? |
|---------------|---------------------------------|---|---|----------------|----------------------------------|
| | | | Fecal Coliform | <i>E. Coli</i> | |
| Cholame Creek | CAR3170008120011127080727 | YES | YES | YES | YES |

2.4.2 Water Quality Temporal Trends

Figure 2-7 illustrates a temporal plot of fecal indicator bacteria water quality data from monitoring site 317CHO. Qualitatively, based on this limited dataset, the magnitude of the fecal coliform impairment does not appear to have changed substantially between the two monitoring cycles.

Figure 2-7. Temporal plot of fecal indicator bacteria data.



2.4.3 Problem Statement

Waterbodies in the Cholame Creek watershed are impaired due to exceedance of fecal coliform water quality objectives and USEPA recommended criteria for *E. coli*. Consequently, water

contact recreation beneficial uses- are not being protected. This project identifies the causes of impairment and describes solutions to achieve water quality objectives and protection of beneficial uses.

TMDLs, numeric targets, and allocations are established for fecal coliform and *E. coli* in this project. These TMDLs address the 303(d) listings of impairment due to fecal coliform and *E. coli* in Cholame Creek, WBID number CAR3170008120011127080727.

3 NUMERIC TARGETS

The Basin Plan contains fecal coliform water quality objectives. These water quality objectives are in place to protect the water contact recreational beneficial use. In addition, monitoring data for *E. coli* can be used to evaluate whether the fecal coliform objective is being met in the subject water bodies (USEPA, 2010).

The Basin Plan water quality objective for fecal coliform, and thus the fecal coliform numeric target used to develop the TMDLs for the Cholame Creek Watershed is:

Fecal coliform

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN per 100 mL, nor shall more than 10 percent of samples collected during any 30-day period exceed 400 MPN per 100 mL.

In addition, USEPA has recommended that California use USEPA's Ambient Water Quality Criteria for Bacteria (1986) when there is no adopted *E. coli* standard. The USEPA freshwater guidance for *E. coli*, (USEPA, 1986), and thus the *E. coli* numeric target used to develop the TMDLs for the Cholame Creek Watershed is:

E. coli

Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of E. coli densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)

Available datasets often do not contain five samples in a 30-day period, so the portion of the objective that is evaluated is that “no more than ten percent of total samples during any 30-day period exceed 400/100 mL.” In instances where fewer than five samples were collected in 30 days, the “ten percent” threshold is exceeded if any one sample exceeds 400/100 mL.

4 SOURCE ANALYSIS

4.1 Inventory of Fecal Coliform Producers

Fecal coliforms are produced by all warm-blooded animals. The first step in this source analysis is to compile population estimates and fecal coliform produced by each animal type in the Cholame Creek watershed.

Table 4-1 summarizes the inventory of major producers (humans, pets, livestock, and wildlife) of fecal coliform in the project area. The methodologies used in compiling these inventories are described in Appendix E: *Fecal Coliform Producer Inventory Data*. The goal of compiling an inventory is ultimately to assess the potential relative magnitudes of contributions of non-controllable (natural background) loads, and controllable (anthropomorphic) loads to waterbodies.

It is important to emphasize that there is uncertainty in these population estimates; they are approximations based on census statistics and estimated wildlife population densities. It is not practical or possible to precisely quantify project area-specific populations of humans, wildlife and livestock in most pathogen TMDL projects. However, these approximations are based on widely accepted methodologies that have been previously used in numerous USEPA and State-approved pathogen TMDLs.

Table 4-1. Fecal coliform producer estimated inventory.

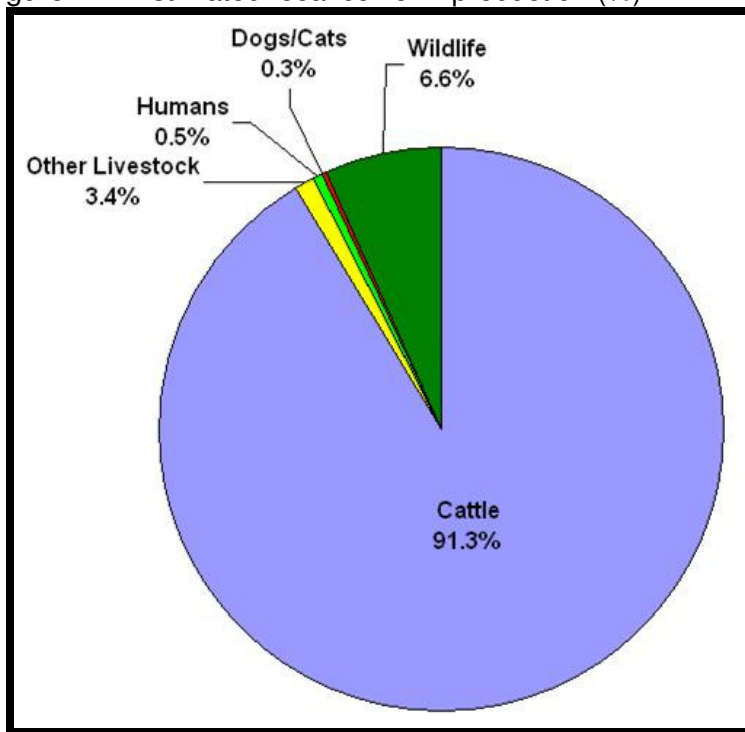
| Category | Sub-Category | Estimated Population | Source of Population Estimate ^A | Fecal Coliform produced per individual/day (cfu) ^B |
|-----------|--------------------|--|--|---|
| Livestock | Cattle | 4754 | USDA Census of Agriculture (2007) | 3.3 E+10 |
| | Horses | 66 | American Horse Council Federation and rural housing data from U.S. Census Bureau | 4.20E+08 |
| | Sheep | 106 | USDA Census of Agriculture (2007) | 1.2 E+10 |
| | Goats | 65 | USDA Census of Agriculture (2007) | Assume equal to sheep |
| | Hogs | 11 | USDA Census of Agriculture (2007) | 1.1 E+10 |
| | Chicken | 221 | USDA Census of Agriculture (2007) | 1.40E+08 |
| Humans | OSDS | 398 | U.S. Census Bureau 2000 Decennial Census | 2.0 E+09 |
| | Sewered | 0 | | |
| Pets | Dogs | 87 | AMVA Pet Ownership Statistics (2007) | 4.50E+08 |
| | Cats | 98 | AMVA Pet Ownership Statistics (2007) | 4.50E+08 |
| Wildlife | Deer | 1516 | California Dept. Fish and Game | 3.5 E+08 |
| | Feral Pig | 910 | California Dept. Fish and Game and local stakeholders | 1.1 E+10 |
| | Coyotes | 152 | Gese et al. (1989); Babb et al. (1989) | 4.50E+08 |
| | Raccoons | 554 | California Dept. Fish and Game | 5.0 E+07 |
| | Opossum | 308 | Kissell and Kennedy (1992) | Assume equal to Raccoon |
| | Skunk | 418 | Ontario Ministry of Natural Resources (1987) | 2.50E+07 Muskrat value, assume skunk=muskrat |
| | Wild Turkey | 1805 | California Dept. Fish and Game | 9.3 E+07 |
| | Duck (peak season) | 115 | Estimated from California Det. of Fish and Game (2008) | 2.40E+09 |
| | Other bird | Reliable estimates of numbers for other birds were not available. To attempt to account for the fecal coliform bacteria that would be produced by other wildlife, an equivalency to all wild turkey in the project area was assumed. | | Assume equivalency to all wild turkey in project area. |

| Category | Sub-Category | Estimated Population | Source of Population Estimate ^A | Fecal Coliform produced per individual/day (cfu) ^B |
|----------|--------------|---|--|---|
| | Other mammal | Reliable estimates of numbers for other mammals were not available. To attempt to account for the fecal coliform bacteria that would be produced by other wildlife, an equivalency to all deer in the project area was assumed. | | Assume equivalency to all deer in project area. |

A - Citations and Links to Sources of Population Estimates: see Appendix E: *Fecal Coliform Producer Inventory Data* – B – References for fecal coliform production, see Appendix E: *Bacteria Source Load Calculator (BSLC) Spreadsheets*

Figure 4-1 shows the relative proportion of fecal coliform production by animal source group. It is important to note, that Figure 4-1 represent the total amount of fecal coliform produced, not the amount delivered to surface waters. The estimates of the proportion of fecal coliforms potentially delivered to surface waters will be developed in subsequent sections of this TMDL project report.

Figure 4-1. Estimated fecal coliform production (%)



To estimate the relative proportion of FIB delivered to surface waters from the various fecal coliform sources in the project area a spreadsheet tool, and some simplifying assumptions were used to assess potential load contributions.

The load to land and load to stream contribution of fecal coliform nonpoint sources were estimated with the Bacteria Source Load Calculator (BSLC) spreadsheet, available from the

Virginia Tech University Center for TMDL Studies. BSLC characterizes how bacterial loads are spatially and temporally distributed in the watershed from user input, and processes the source data to calculate 1) non-point source fecal coliform loads to land; and 2) fecal coliform loads to stream from direct in-stream deposition. The BSLC spreadsheet calculations and input parameters are included in Appendix E: *Bacteria Source Load Calculator (BSLC) Spreadsheets*. BSLC itself does not simulate die-off once bacteria reach the land surface. However, attenuation of bacteria prior to runoff into streams was incorporated by comparing the fecal coliform totals deposited on land, to reasonable area loading rates found in published literature (Horner, 1992 as reported in Shaver et al., 2007; New Jersey Dept. of Environmental Protection, 2008).

Accordingly, staff approximated attenuation of fecal coliform prior to discharge into surface waters by using delivery ratios previously developed in the Central Coast Water Board's Total Maximum Daily Load for Fecal Coliform for the Lower Salinas River Watershed project report (Central Coast Water Board, 2010). Estimated delivery ratios of pollutants to receiving surface waters are a commonly used methodology to approximate attenuation of pollutants deposited on land and subject to distance attenuation, die off, and/or filtering prior to discharging to the surface waterbody (for example, Watershed Treatment Model, 2002; Minnesota Pollution Control Agency, 2002; Minnesota State University, 2007).

As such, for the Cholame Creek project area the fractional amount of total fecal coliform potentially discharged to surface water is estimated by multiplying the total fecal coliform produced from sources in the BSLC spreadsheets by the estimated delivery ratio shown in Table 4-2. The results of the BSLC calculations are shown in Appendix E: *Bacteria Source Load Calculator (BSLC) Spreadsheets*.

Table 4-2. Fecal coliform delivery ratios.

| Land Use / Source Category | Delivery Ratio: % of Total Fecal Coliform <u>Potentially</u> Available for Runoff/Discharge to Surface Water |
|--|---|
| Crops | 5% |
| Pasture Grassland Rangeland | 0.1% |
| Forest | 0.7% |
| Direct In-Stream Defecation | 100%* |

* livestock/wildlife defecation into a stream is assumed to have a 100% delivery ratio, because all fecal coliforms are discharged directly into the surface water body, with no opportunity for attenuation.

The delivery potential ratios in Table 4-2 should be considered gross screening-level approximations of the “averaged” fractional amounts of fecal material potentially available for delivery to surface waters. This is an important distinction, because there remains substantial uncertainty about the exact relationship between FIB loads observed in overland runoff, and the water column FIB loads observed in streams. In many reported studies, it is not clear whether the monitored overland flow ultimately discharges to a waterway or simply infiltrates into the soil at some point down the hill slope. The uncertainty associated with delivery hinders quantification of the overland flow contribution to FIB loading of streams (Collins, et al. 2005).

4.2 Point Sources

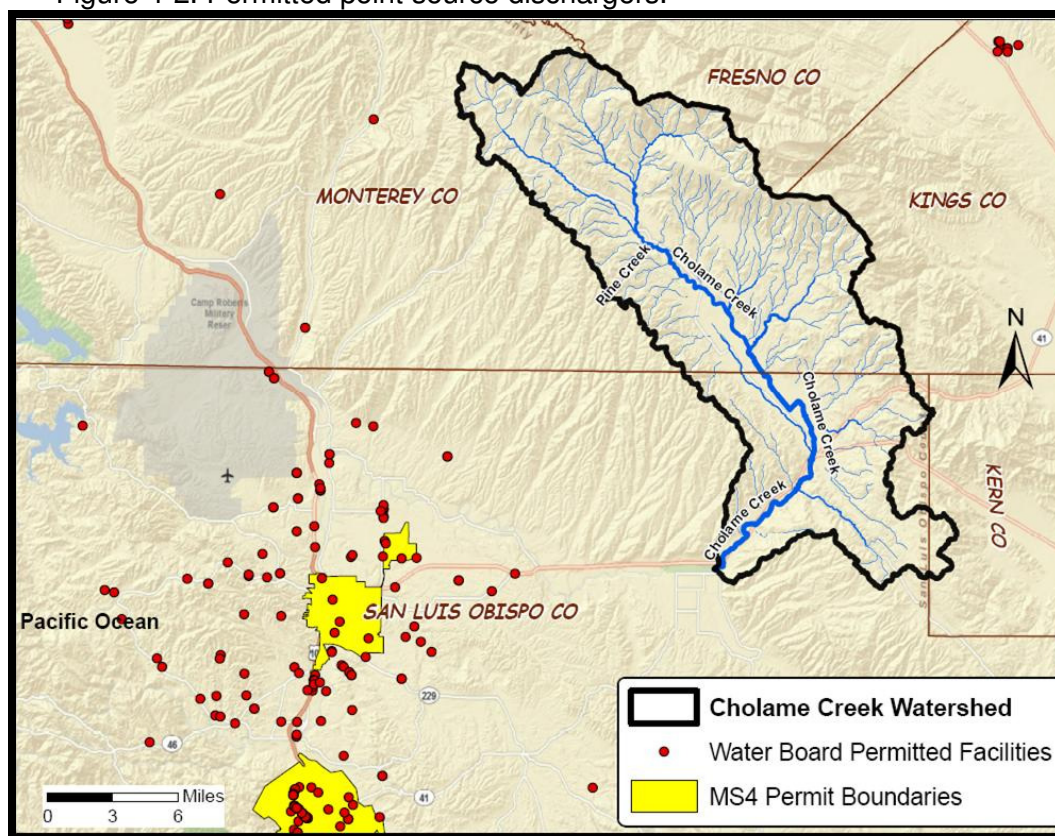
4.2.1 Entities Subject to Waste Discharge Permits

Discharges from wastewater point sources can be a significant source of anthropogenic FIB loads to surface waters (USEPA, 1999). However, in the Cholame Creek watershed there are no waste water treatment plants (WWTP), sanitary sewer collection systems, permitted industrial discharges, concentrated animal feeding operations (CAFO) or other NPDES-permitted dischargers (see Figure 4-2). As such, no wasteload allocations are developed for these source categories.

4.2.2 MS4 Storm Water Permits

There are no census designated urbanized areas or NPDES permitted MS4 stormwater entities in Cholame Creek watershed as illustrated in Figure 4-2. As such, no wasteload allocations are developed for these source categories.

Figure 4-2. Permitted point source dischargers.



4.3 Nonpoint Sources

4.3.1 Grazing Operations

Livestock such as cattle, goats, and horses spend most of their time grazing on pasture or rangeland. It has been well established that grazing livestock can be a significant, diffuse source of fecal coliform loads to surface waters (Baxter-Potter and Gilliland, 1988; Rosen, 2000).

Runoff from rainfall washes some of the manure deposited in the pastures into drainage features and nearby surface water bodies. Additionally, cattle and other animals are often allowed access to streams and ponds. Direct manure deposition may occur when cattle cross a stream, or through sporadic incursions into the stream channel for water or shade. Fecal material deposited directly into surface waterbodies may be a significant source of fecal coliform loads, in addition to the surface runoff from rangeland or pasture.

It is important to note that Staff acknowledges the work done by California Cattleman's Association, the Central Coast Rangeland Coalition, the Monterey County Cattlemen's Association, Conservation Districts, Natural Resource Conservation Districts, University of California Cooperative Extension, and rangeland managers within the Central Coast region. These entities have provided and attended educational courses, provided research and funding assistance to rangeland managers, and have reportedly implemented rangeland management practices to improve water quality. The California Cattlemen's Association has developed a draft Nonpoint Source Grazing management strategy, containing information and strategies to manage pollutant loads from lands with domestic animals. In spite of some water quality issues associated with rangeland, staff acknowledges that it is widely accepted among many resource professionals that well-managed rangeland in California's central coast region can have significant ecological and land use benefits overall.

Grazing lands comprise the overwhelming majority of land use in the Cholame Creek watershed. 85% of the land cover supports grazing lands, according to the 2008 FFMP land cover data set (see Section 2). The FMMP land cover is a digital dataset depicting the location and extent of grazing lands, and is compiled by the California Department of Conservation, in cooperation with the California Cattlemen's Association and the University of California Cooperative Extension.

Water Board staff have routinely observed evidence of grazing cattle in the around Cholame Creek at monitoring site 317CHO, including observations of cow manure and cattle loafing in the creek (personal communication, Erin Sanderson, CCRWQCB Dec. 1, 2010; Mary Adams, CCRWQCB Dec. 17, 2010). Cattle have been observed using the creek for water and shade. Additionally, the Upper Salinas-Las Tablas Resource Conservation District (US-LT RCD, 2002) evaluated cattle management techniques in the watershed and reported some areas in the upper watershed along Little Cholame Creek (refer back to Figure 2-1) where cattle were not restricted from the riparian area, and there were cattle impacts. It should be noted that US-LT RCD also reported that some ranchers evidently have installed off-creek watering systems and are practicing rotational grazing techniques to limit cattle impacts on riparian areas. Overall, the aforementioned observations indicate that cattle manure is a probable source of fecal coliform loads to Cholame creek and its tributaries.

Using the BSLC spreadsheet tool, and delivery assumptions outlined in Section 4.1, the estimated annual potential load to Cholame Creek from domestic animals is shown in Table 4-3. The total amount of fecal coliform available for potential discharge is obtained by multiplying the total amount of livestock fecal coliform deposited to pasture/rangeland or stream (from BLSR spreadsheets), and multiplying it by the delivery potential (%) shown in Table 4-2.

Table 4-3. Estimated annual fecal coliform load from domestic animals available for potential discharge into surface waters.

| Subwatershed | Domestic Animal Fecal Coliform Available for Potential Discharge (MPN/year) | | Total Fecal Coliform Available |
|-------------------------|---|-----------------------------|--------------------------------|
| | Pasture/Rangeland | Direct In-stream Defecation | |
| Cholame Creek watershed | 7.17E+13 | 3.15E+14 | 3.87E+14 |

Given the information presented above, staff concludes that livestock and other domestic animals are probable source categories of indicator bacteria in surface waters of the project area. As such, this source category is assigned a load allocation in this TMDL. Actions to control these sources are included in the Implementation Section.

4.3.2 Confined Animal Facilities

Animal waste associated with confined animal operations (feedlots, dairies, etc.) can constitute a potential significant source of fecal indicator bacteria loads to surface waters. Unregulated or poorly managed confined animal facilities on a unit area basis (e.g., per acre) can typically be a higher pollutant loading risk than lightly grazed rangeland. The California Department of Water Resources (DWR) Agricultural Land Use Survey program has compiled digitized crop data which identify the locations of feed lots, dairies, and poultry facilities. The digital DWR crop data can be downloaded from:

<http://www.water.ca.gov/landwateruse/lusrvymain.cfm>

According to the most recent vintage DWR crop map data available for the project area, in the entire Cholame Creek watershed (237 square miles) there is one confined animal facility, which DWR classifies as a “feedlot”. DWR data indicate this facility is only 1.5 acres in size, and is located in the southwestern uppermost headwater reaches of the watershed near the Kern County line (six miles from Cholame Creek). According to NHDplus high resolution flowline spatial data, the nearest surface waterbody to this facility is a first-order, unnamed ephemeral creek located 0.4 miles away from the facility. Based on the DWR crop data, confined animal facilities are virtually non-existent in the watershed and do not appear to be a substantial risk for fecal indicator bacteria loads to surface waters. At this time staff concludes that confined animal facilities in the project area are not causing or contributing in any significant way to water quality exceedances. As such, this source category is not assigned a pollutant load allocation in this TMDL.

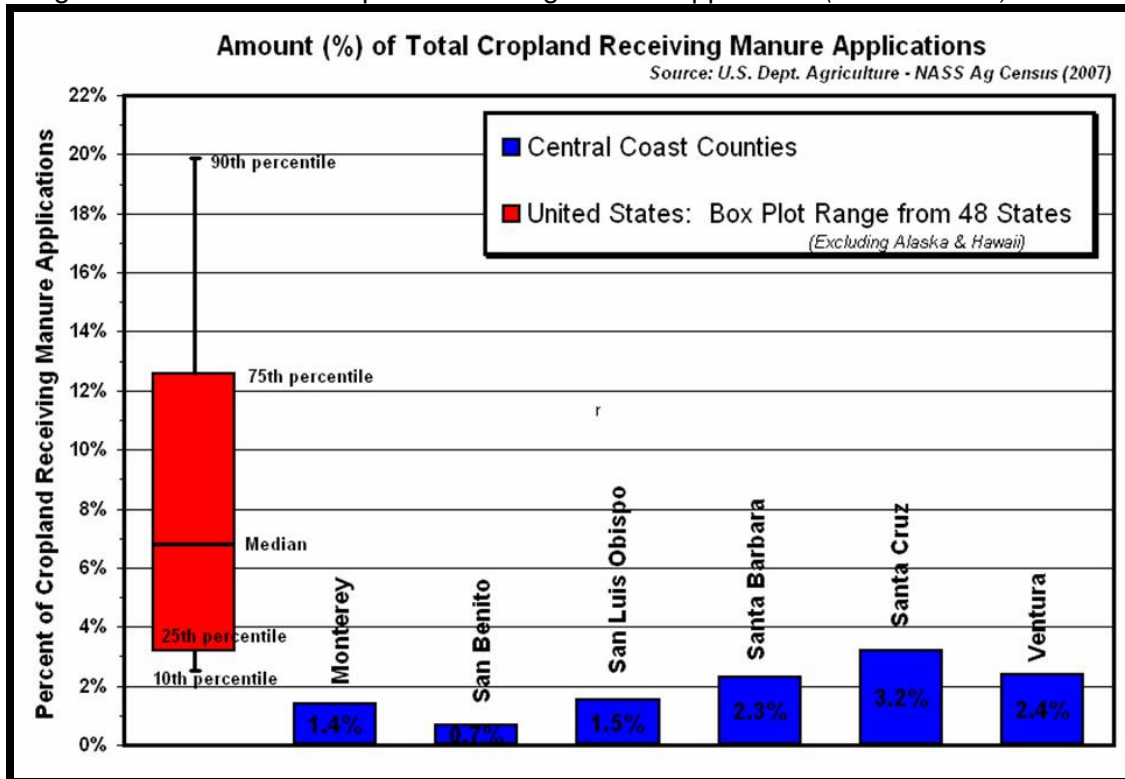
4.3.3 Cropland and Manure Application

It is widely accepted that a major risk of controllable pathogen loading from croplands is associated with application of raw or untreated manure, or the improper storage of manure (USEPA, 2001). However, only about 8% of the Cholame Creek watershed’s land cover is comprised of cropland (see Section 2), primarily grain and hay crops according to California Department of Water Resources crop maps (see Appendix C:). Also, grain and hay crop typically require relatively low irrigation intensity in California according to the U.S. Department of Agriculture’s 2009 Census of Farm and Ranch Irrigation.

Furthermore, the Resource Conservation District (RCD) of Monterey County reports that raw manure application in the Central Coast region has been largely phased out (Monterey County RCD, 2006). To validate the RCD reporting, staff evaluated 2007 county-level agricultural census data available from the U.S. Department of Agriculture National Agricultural Statistics Service (NASS) database (www.nass.usda.gov). Staff presumed that reported manure application practices at the Monterey County and San Luis Obispo counties scale is representative of manure application rates/practices croplands of the Cholame Creek watershed of southern Monterey County and northern San Luis Obispo counties. NASS reports that in Monterey and San Luis Obispo counties, only 1.4-1.5%% of total cropland acreage received manure application. In fact, the overwhelming majority of farms in these counties with irrigated cropland used inorganic chemical fertilizers, lime, or soil conditioners (CalFERT, 2007; NASS 2007).

For comparative purposes, staff evaluated NASS census data for manure application in the entire conterminous United States. Ranges of manure application rates in other states were significantly higher relative to the manure application rate in San Luis Obispo and Monterey counties (see Figure 4-3). In fact, the manure application rate in San Luis Obispo and Monterey counties is well below the 10th percentile (i.e., the extreme low end range) of manure application rates reported in the entire conterminous United States. Additionally, although NASS doesn't report the exact nature or type of manure application, it is probable that most, or at least some fraction, of the acreage in Monterey County receiving manure application were with treated or composted manure, rather than raw manure (for example, see CalFERT, 2007). Treated or composted manure typically have negligible pathogen content, since the composting process involves the removal of the pathogenic fraction of the raw stock manure.

Figure 4-3. Percent of cropland receiving manure application (source: NASS).



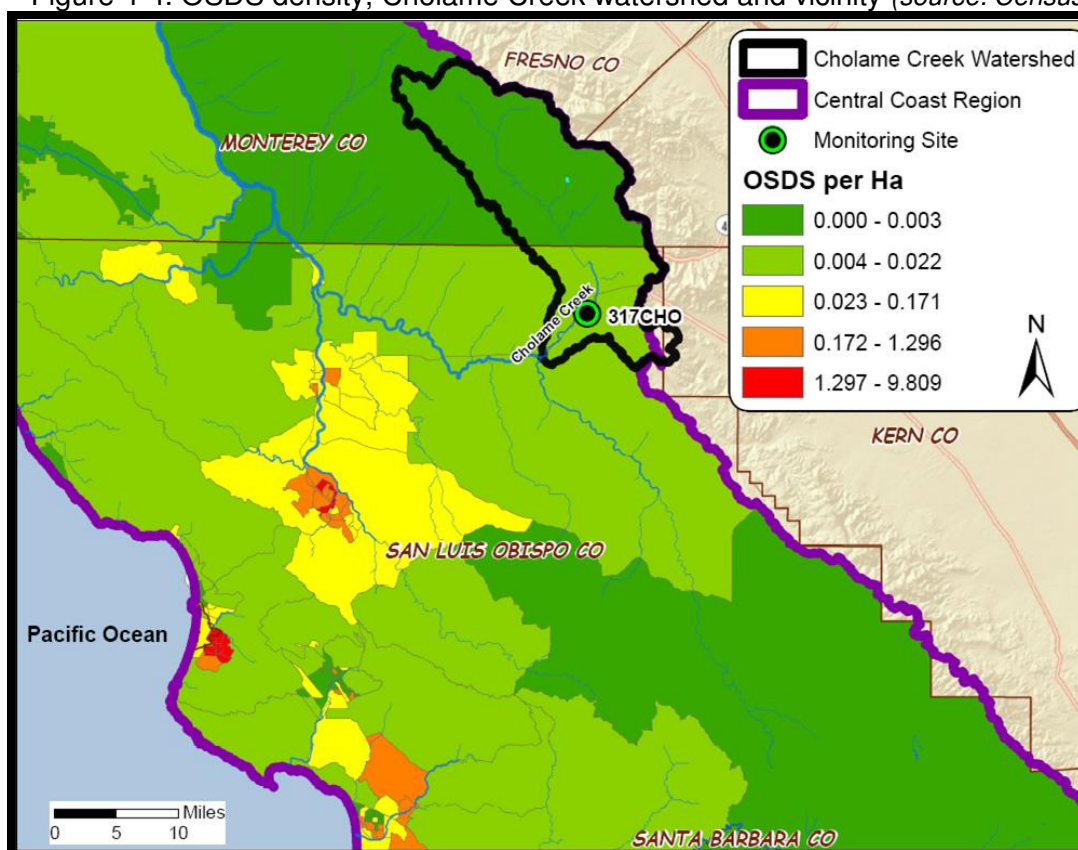
In summary, based on the small amount of cropland in the subwatershed, and considering that raw or untreated manure application is evidently negligible, staff concludes that agricultural cropland operations are not a significant source of controllable fecal coliform loads contributing to exceedance of water quality objectives in the Cholame Creek watershed. Consequently, this source category is not assigned to the load allocation in this TMDL. Staff recognizes that fecal material from natural wildlife sources is deposited on cropland, and potentially mobilized in runoff. Natural background has been identified as a source and will be assigned a load allocation. It is important to note that non-controllable natural background loads are not subject to regulatory actions by the Water Board.

4.3.4 Onsite Disposal Systems

Onsite disposal systems (i.e., septic systems) can potentially contribute significant pathogen loads to receiving surface waterbodies due to leakage or system failure (USEPA, 2001).

Figure 4-4 illustrates Census Bureau data which indicates that there is a very low density of OSDS (OSDS/unit area) in the Cholame Creek watershed, relative to other areas of San Luis Obispo county. At a preliminary screening-level assessment this suggests that surface water quality problems are unlikely to be associated with failing OSDS.

Figure 4-4. OSDS density, Cholame Creek watershed and vicinity (source: Census Bureau).



In addition, other watershed physical metrics can be evaluated to assess the risk of pathogen loading from OSDS. Pathogen loading to surface waters from OSDS can generally occur from either hydraulic failure – where sewage breaks out at land surface – or effluent transport through bedrock fractures, potentially discharging to a surface water body if hydraulically connected (Horsley and Witten, 1996). Typically, these kinds of OSDS failures are only a

significant threat to surface water quality when the OSDS is located in close proximity to a surface water body. Horsley and Witten (1996) report that the risk of pathogen loading to surface waters from OSDS is highest when the OSDS is located with 100 feet of a surface water; when local soil permeability is low; or when there is shallow bedrock, particularly when the bedrock is prone to fracture permeability. In contrast, when OSDS are located at distance from a surface waterbody; when soil permeability is high, and/or where bedrock is at depth, the risks of pathogen loading to surface water becomes significantly and progressively lower.

Consequently, staff evaluated soil and geologic attributes and land use data to assess the risk of potential pathogen loading from OSDS in the project area. Areas proximal to the creek are comprised predominantly of a variety of hydrologic soil group types, including some riparian areas comprised of hydrologic soil group D (see Appendix C:). Hydrologic soil group D are poorly drained soils and are prone to runoff. Accordingly, OSDS effluent that might surface due to hydraulic failure could possibly runoff and discharge to streams in these areas. However, the TMDL project area is in a very rural environment, and land use data and cursory reviews of aerial imagery indicate there are virtually no residential areas or residential structures located in close proximity (~100 feet) to Cholame Creek. Furthermore, the virtually the entire subwatershed is composed of sedimentary rock (see Appendix C:). Sedimentary rock is not generally prone to fracture porosity; as such any OSDS in the project area evidently at low risk of sewage transport to surface waters via fracture hydraulics.

Based on the aforementioned information, OSDS appear to be a low risk and a negligible source of FIB loading in the Project Area and are consequently not assigned to the load allocation in this TMDL.

4.3.5 Sediment Sources (Bedload)

Stream and lake sediments can serve as an environmental reservoir for fecal coliform and other indicator bacteria. In previous central coast pathogen TMDLs, staff has received recommendations from scientific peer reviewers to consider including sediment resuspension of indicator bacteria as a distinct nonpoint source load (Wuertz and Schriewer, 2009).

Surviving fecal coliforms deposited in sediments and organic material at some time in the past, and which are not attributable to a recent pollution event, could be swept up into the water column due to a resuspension event. This may constitute a naturalized source of fecal coliform stream loads, referred to in this section as “bedloads”. Sediments can be resuspended when shear stress exerted on the stream bed exceeds the critical shear stress for incipient motion. This scouring results in stream sediment with associated indicator bacteria being resuspended, and thus contributing to the overlying water column concentrations of fecal coliform.

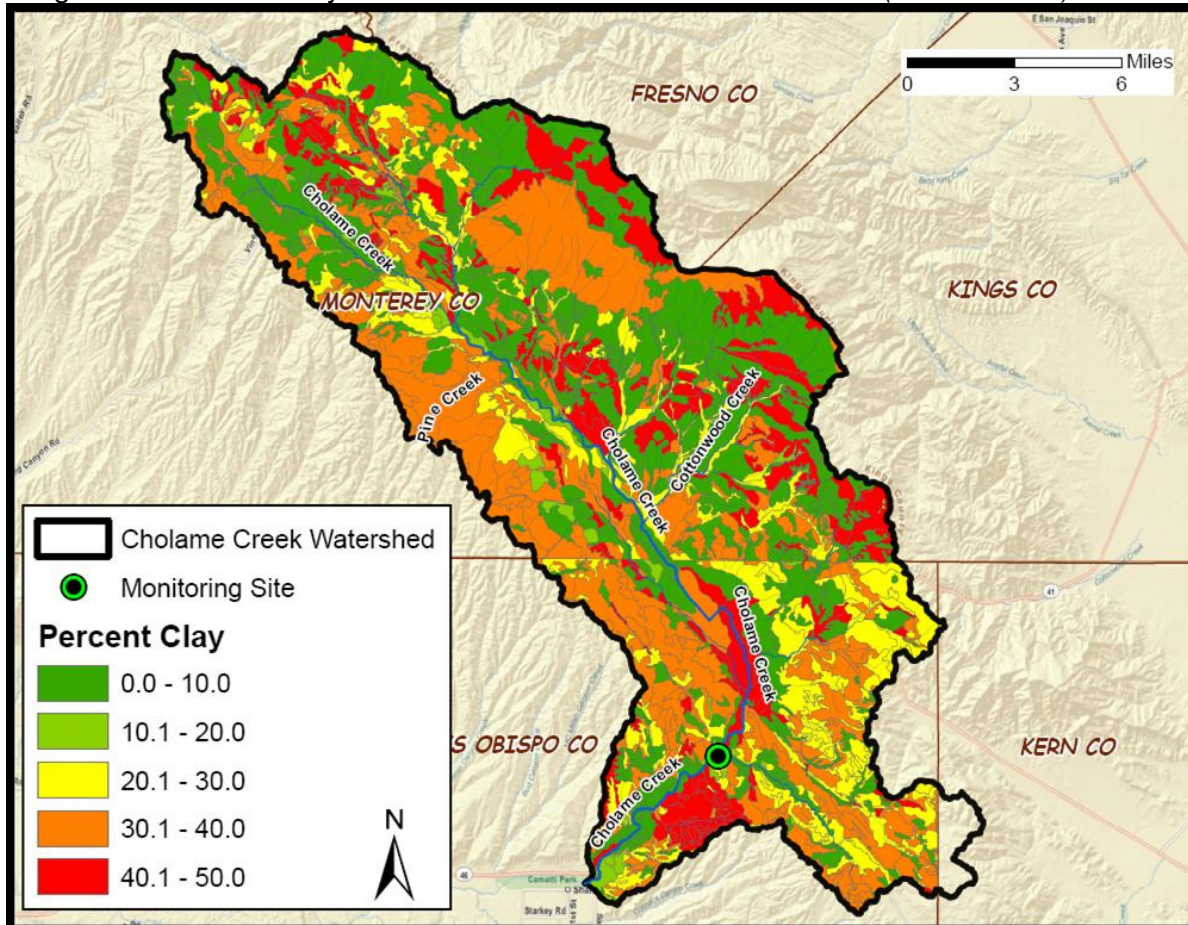
Staff considers the fecal coliforms resulting from propagation and multiplication from controllable sources to be a naturalized source. Staff does consider these fecal coliforms controllable, insofar as the parent coliforms are from controllable sources. It is reasonable to presume that a substantial fraction of sediment-associated bacteria originally came from controllable sources given that the overwhelming majority of fecal coliform production in the project area appears to be from anthropogenic activities and domestic animal operations (refer back to Figure 4-1).

There is uncertainty about the scope and extent of this source in the project area, and the potential for propagation of microbial indicators deposited in sediment or organic matter in the Cholame Creek watershed is largely unknown at present. However, using GIS spatial data for soils it is possible to develop screening-level assessments of the potential risk of sediment-associated fecal coliform sources in the Project Area.

Sediment-associated bacteria are typically associated with fine, or cohesive sediment particles in aquatic environments (Gannon, et al., 1983; Wilkinson et al., 1995). Cohesive sediments are defined as sediment particles less than 60 microns in diameter; this generally includes silt-sized and clay-sized particles (NRCS, 1999). Typical flow velocities that cause streambed erosion of fine-grained sediments range from 3.0 feet/sec for silty loams to 5.0 feet/sec for colloidal clays and silts (City of Raleigh, 2003).

Therefore, based on the aforementioned literature, staff presumes that locations in the project area comprised of soils with $\geq 40\%$ clay-sized particles would constitute potential significant source areas of sediment-associated bacteria loads. The 40% clay content criterion was chosen by staff because this is consistent with published U.S. Department of Agriculture (USDA) soil criteria. The USDA's soil texture chart classifies soils with greater than 40% clay content as clay, silty-clay, or sandy-clay depending on the fractional content of sand or silt: <http://soils.usda.gov/technical/aids/investigations/texture/> Soil characteristics are contained in the Monterey County Soil Survey, published by the Natural Resources Conservation Service (NRCS), and the Soil Survey Geographic (SSURGO) database for soils. Staff used NRCS soil attribute data to geographically locate regions characterized predominantly by clay-rich soils in the project area (see Figure 4-5).

Figure 4-5. Percent clay in soils in the Cholame Creek watershed (source: NRCS)



The NRCS soil data indicates that approximately 15% of the Cholame Creek Watershed TMDL project areas are comprised of soils containing greater than 40% clay materials (see Table 4-4). This represents an appreciable amount of the watershed's areal extent. Consequently, staff concludes that Cholame Creek could have potentially significant sediment-associated bacteria bedloads.

Table 4-4. Percent of TMDL project area comprised of clay-rich soils.

| Cholame Creek Watershed (acres) | Amount of Subwatershed Comprised of >40% Clay Soils ^A (acres) | Percent of Subwatershed Soils Comprised of > 40% Clay Soils |
|---------------------------------|--|---|
| 151697 | 23075 | 15% |

A- Corresponds to USDA soil texture classifications as: clay; silty-clay; or sandy-clay.

The loads associated with resuspension of sediment (bedloads) can be estimated using the Bacteria Load Estimation Spreadsheet (BLEST) tool, developed by the Texas Commission on Environmental Quality. The methodology for calculating bedloads with BLEST is detailed in Appendix F: *Bedloads - Bacteria Load Estimator Spreadsheets (BLEST)*. By multiplying the occurrence of resuspension flows (i.e., storm events), bacteria resuspension rates, estimates of the length of time the stream experiences critical shear conditions, and estimates of stream width and stream lengths, estimated fecal coliform bedloads were calculated as shown in Table 4-5.

Table 4-5. Estimated indicator bacteria bedloads.

| Waterbody | Ave. No. of Storm Events/Year* | Median <i>E. Coli</i> Resuspension Rate (MPN m ⁻² sec ⁻¹)** | MPN / Storm Event | Annual Bedload (MPN/yr) |
|-------------------------|--------------------------------|--|-------------------|-------------------------|
| Cholame Creek @ 317 CHO | 6 | 11,000 | 4.41E+12 | 2.64E+13 |

* Average number of annual precipitation events ≥ 0.5 inches in 24 hour period, 1994 to 2010 (source: daily precipitation data from King City CIMIS weather station #113), available from California Irrigation Management Information System)

** Jamieson et al. (2005). *E. Coli* value. Fecal coliform resuspension rate was not reported. *E. coli* is a bacterial subset of fecal coliform, accordingly Staff use *E. Coli* here, as a surrogate for fecal coliform.

In summary, based on the information presented above, staff considers bacteria from resuspended sediments (bedload) to be a probable source contributing to observed loads in the water quality monitoring data from Cholame Creek. As such, sediment sources are assigned to the load allocation for this TMDL.

4.3.6 Non-controllable Natural Sources

Wildlife (mammals and birds) contribute a background level of fecal coliform bacteria to surface waters. Wastes from wildlife may be carried into nearby streams by runoff during rainfall. Animals can also defecate directly into streams. These constitute non-controllable natural sources not subject to regulation by the Water Board.

Some uncertainty exists whether the non-controllable fraction of FIB alone is causing receiving water concentration of FIB to exceed the numeric target. The ability to differentiate between controllable and natural sources is an uncertainty in these TMDLs. This phenomenon represents an uncertainty that staff has attempted to address through an empirical analysis of land use data, sources of fecal coliform bacteria (humans, wildlife, livestock), hydrologic data, livestock and wildlife inventory data in this Project Report.

Using the species-specific fecal coliform production and the delivery ratio assumptions outlined in Section 4.1 and the calculations from the BSLC spreadsheet tool, the annual amount of fecal coliform that is potentially available for runoff or discharge into surface waters is shown in Table 4-6.

Table 4-6. Estimated annual fecal coliform load from wildlife available for potential discharge into surface waters.

| Watershed | Wildlife Fecal Coliform Available for Potential/Discharge (MPN/year) | | | | Total Fecal Coliform Available |
|-------------------------|--|----------|-------------------|-----------------------------|--------------------------------|
| | Forest | Cropland | Pasture/Rangeland | Direct In-stream Defecation | |
| Cholame Creek Watershed | 2.16E+12 | 1.85E+13 | 2.27E+12 | 5.69E+13 | 7.99E+13 |

The calculated potential annual load of 7.99E+13 mpn/year is less than the potential contribution from domestic animals (see Section 4.3.1), but the magnitude nonetheless represents a substantial load to surface waters in the project area.

In summary, staff concludes that wildlife is a source category of indicator bacteria in surface waters of the project area. As such, this source category is assigned a load allocation in this TMDL. Loads from non-controllable natural sources are not subject to regulation by the Water Board.

4.4 Summary of Sources

Table 4-7 shows the summary of identified sources of indicator bacteria in the Cholame Creek watershed TMDL project area. Staff listed the sources by source category and the estimated proportional magnitude of FIB loads. The source loads are staff estimates based on the amounts of fecal coliforms that are available to potentially be discharged to surface waters from various sources. It is worth reiterating that these estimates are for the amount of fecal indicator bacteria *potentially* available for discharge to surface waters; there is no attempt to make discounts for load reductions resulting from improved management practices that may already be in place along some stream reaches.

The estimated relative magnitude of identified sources are also shown graphically in Figure 4-6. As noted previously, there are uncertainties associated with such estimates. The estimated population and/or densities of fecal coliform sources are approximations based on census data, scientific literature, or indirect evidence. The delivery ratios of fecal coliform used from section 4.1 are broad approximations, derived from literature values for loading rates or best professional judgment. The Bacteria Source Load Calculator spreadsheet results represent one line of evidence in TMDL source characterization, producing a scoping level risk assessment of sources and potential loads. The amount of fecal material delivered from any one source will vary depending on numerous factors. Because of this uncertainty, these are estimates only as the actual loading from each source is unknown. That said however, in making these estimates Staff employed methods and techniques that are recognized by USEPA or other Agencies to develop approved TMDLs.

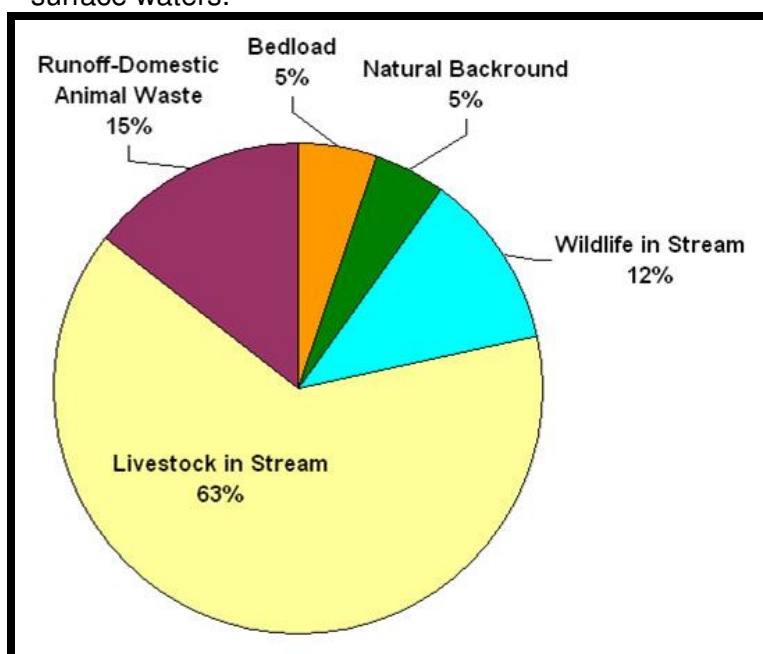
It is important to emphasize that these estimated amounts of fecal coliform available for discharge to surface waters represents an aggregate load for the entire Cholame Creek watershed. It is not known what proportion of this load is actually being measured at monitoring site 317CHO. This is because bacteria flowing from the upper reaches of a large watershed

may have little impact on a stream reach in the lowermost parts of the watershed due to die off and attenuation. Note also that the estimated relative magnitude of potential source contributions is calculated on an annualized basis. These represent annual estimated loads from the entire watershed drainage. Loads from various source categories could have substantial variability on different seasonal and temporal scales, or due to localized conditions.

Table 4-7. Estimated annual fecal coliform from all sources available for potential discharge into surface waters (MPN/year).

| | Point Sources (WLA) | Nonpoint Sources (LA) | | | | | Total |
|-------------------------|---------------------|--------------------------------|-----------------------------|----------------------------|--------------------|----------|----------|
| | None Identified | Runoff - Domestic Animal Waste | Runoff - Natural Background | Domestic Animals In-stream | Wildlife In-stream | Bedload | |
| Cholame Creek watershed | 0 | 7.17E+13 | 2.29E+13 | 3.15E+14 | 5.69E+13 | 2.64E+13 | 4.67E+14 |

Figure 4-6. Estimated distribution of fecal coliform annually available for potential discharge to surface waters.



5 LOADING CAPACITY AND ALLOCATIONS

5.1 Introduction

A TMDL is the pollutant loading capacity that a water body can accept while protecting beneficial uses. Usually, TMDLs are expressed as loads (mass of pollutant calculated from concentration multiplied by the volumetric flow rate), but in the case of fecal coliform, it is more logical for TMDLs to be based on concentration. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure [40 CFR §130.2(l)]. Expressing the TMDL

as a concentration equal to the water quality objective ensures that the water quality objective will be met under all flow and loading conditions. The density (concentration) of fecal indicator organisms in a discharge and in the receiving waters is the technically relevant criterion for assessing the impact of discharges, the quality of the affected receiving waters, and the public-health risk.

5.2 Loading Capacity

The loading capacity for water body segments in the Cholame Creeker watershed is the amount of fecal coliform and *E. coli* that can be assimilated without exceeding the water quality objectives. The Basin Plan water quality objective for fecal coliform, and the USEPA freshwater guidance for *E. coli*, (USEPA, 1986) and thus the loading capacity for the waterbodies are:

Fecal coliform

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN per 100 mL, nor shall more than 10 percent of samples collected during any 30-day period exceed 400 MPN per 100 mL.

E. coli

Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of E. coli densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)

5.3 Linkage Analysis

The goal of the linkage analysis is to establish a link between pollutant loads and water quality. This, in turn, supports that the loading capacity specified in the TMDLs will result in attaining the numeric target. For these TMDLs, this link is established because the numeric target concentrations are the same as the TMDLs, expressed as a concentration. Sources of fecal coliform and *E. coli* that lead to waterbody impairment have been identified. Therefore, reductions in fecal coliform loading from these sources should result in a reduction of water column concentrations. The numeric targets are protective of recreational beneficial uses; hence the TMDLs define appropriate water quality conditions.

5.4 TMDL Allocations

Allocations are concentrations, loads, or some other measure that when totaled, equals the loading capacity described as shown in Section 5.2. Allocations are applied to the sources identified in the Source Analysis Section.

5.4.1 Concentration-based TMDL

A TMDL is the pollutant loading capacity that a water body can accept while protecting beneficial uses. Usually, TMDLs are expressed as loads (mass of pollutant calculated from concentration multiplied by the volumetric flow rate), but in the case of fecal coliform, it is more logical for TMDLs to be based on concentration. TMDLs can be expressed in terms of either mass per time, toxicity, or other appropriate measure [40 CFR §130.2(l)]. Concentration based TMDLs make more sense in this situation because the public health risks associated with recreating in contaminated waters scales with organism concentration, and fecal coliform is not readily controlled on a mass basis. Establishment of a concentration-based, rather than a load-based TMDL has the advantage of eliminating the need to conduct a potentially error-prone

analysis to link loads and expected concentrations. A load-based TMDL would require calculation of acceptable loads based on acceptable bacterial concentrations and expected flows, and then back-calculation of expected concentrations under various load reduction scenarios. Since flows in Cholame Creek, are highly variable and difficult to measure, such an analysis would inevitably involve a great deal of uncertainty, with no increased water quality benefit.

As such, staff proposes the TMDLs as the same set of concentrations as staff proposed in the numeric targets section. Therefore, the concentration-based TMDLs for fecal coliform and *E. coli* for all impaired waters in the Cholame Creek watershed, including:

The following waterbodies currently listed on the 303(d) list:

1. The Cholame Creek (the entire Creek) from the uppermost reaches of the waterbody to the confluence with the Estrella River

And for all tributaries to the above-named waterbodies, as well as herein un-named waterbodies situated in the Cholame Creek watershed (Hydrologic Unit Code 1806000402) are concentration-based TMDLs applicable to each day of all seasons and are equal to the following:

Discharges may not cause receiving water concentration of fecal coliform to exceed the following:

Fecal coliform

Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400/100mL.

E. coli

Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of E. coli densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986)

5.4.2 TMDL Allocations

Table 5-1 shows the load allocations to responsible parties. All the allocations are equal to the TMDLs, which are expressed as receiving water concentrations. As noted previously, staff proposes to implement a concentration-based TMDL, equal to the numeric targets for fecal coliform.

All responsible parties for sources of fecal coliform to the Cholame Creek watershed will be accountable to attain these allocations. The parties responsible for the allocations to non-natural (controllable) sources are not responsible for the allocation to natural (uncontrollable) sources.

Table 5-1. TMDL Allocations.

| WASTE LOAD ALLOCATIONS | | | |
|---|---------------------------|--|---|
| <u>Waterbody</u> | <u>WBID</u> | <u>Party Responsible for Allocation (Source)</u> <u>NPDES/WDR number</u> | <u>Receiving Water Fecal Coliform (MPN/100mL)</u> |
| All impaired water bodies ^a | CAR3170008120011127080727 | NONE IDENTIFIED | NOT APPLICABLE |
| LOAD ALLOCATIONS | | | |
| <u>Waterbody</u> | <u>WBID</u> | <u>Responsible Party (Source)</u> | <u>Receiving Water Fecal Coliform (MPN/100mL)</u> |
| All impaired water bodies ^a | CAR3170008120011127080727 | <u>Owners/operators of land used for/containing domestic animals/livestock</u> (Domestic animals/livestock waste) | <u>Allocation-1</u> <u>Allocation-2</u> |
| All impaired water bodies ^a | CAR3170008120011127080727 | <u>No responsible party</u> (Natural sources) | <u>Allocation-1</u> <u>Allocation-2</u> |
| Wasteload Allocation: None – not applicable. | | | |
| Load Allocation – Allocation-1: (Equal to the TMDL):Fecal coliform concentration, based on a minimum of not less than five samples for any 30-day period, shall not exceed a log mean of 200 MPN/100mL, nor shall more than ten percent of total samples during any 30-day period exceed 400 MPN/100 mL. | | | |
| Load Allocation – Allocation-2: (Equal to the TMDL for <i>E. coli</i>): Based on a statistically sufficient number of samples (generally not less than 5 samples equally spaced over a 30-day period), the geometric mean of <i>E. coli</i> densities should not exceed: 126 per 100mL; and no sample should exceed a one sided confidence limit (C.L.) calculated using the following as guidance: lightly used for contact recreation (90% C.L.) = 409 per 100mL (USEPA, 1986) | | | |

^a Cholame Creek: all reaches of the creek and all tributaries of the waterbody upstream of monitoring site 317CHO. If and when water quality data becomes available and confirms impairment in Chalome Creek just upstream of the confluence with the Estrella River, then the TMDL will apply to all tributaries of Chalome Creek to the confluence with the Estrella River.

The TMDLs are considered achieved when the allocations assigned to all individual responsible parties are met, or when the numeric targets are consistently met.

Should all control measures be in place, pathogen indicator organism concentrations remain high, and a TMDL not be met, staff may investigate (e.g., genetic studies to isolate sources or other appropriate monitoring) to determine if the high level of indicator organisms is due to uncontrollable sources. Responsible parties may demonstrate that controllable sources of pathogen indicator organisms are not contributing to exceedance of water quality objectives in receiving waters. If this is the case, staff may consider re-evaluating the numeric targets and allocations. For example, staff may propose a site-specific objective to be approved by the Central Coast Water Board. The site-specific objective may be based on evidence that natural or background sources alone were the cause of exceedances of a TMDL.

5.4.3 Daily Load Expressions

Staff provides daily load expressions in light of a court decision (*Friends of the Earth, Inc. v. EPA, et al.*, No. 05-5015, D.C. Cir. 2006), and USEPA guidance {USEPA 2007(b)}, despite the fact that this is a concentration-based TMDL and a daily or average daily TMDL is not appropriate for this TMDL project. Mass-based daily load expressions are provided to comply with USEPA technical and legal guidance. USEPA continues to recognize the validity of

concentration based TMDLs, in accordance with 40 CFR 122.45(f), but recommends supplementing a concentration-based TMDL with a daily load expression, as shown below:

*“For TMDLs that are expressed **as a concentration of a pollutant**, a possible approach would be to use a **table and/or graph to express the TMDL as daily loads for a range of possible daily stream flows**. The in-stream water quality criterion multiplied by daily stream flow and the appropriate conversion factor would translate the applicable criterion into a daily target.”**

*emphasis added

From: USEPA. 2007. Options for Expressing Daily Loads in TMDLs. USEPA Office of Wetlands, Oceans, and Watersheds, Draft Guidance, June 22, 2007.

The mass-based daily load expressions for the Cholame Creek Watershed Indicator Bacteria TMDL are presented in Appendix H: *Daily Load Expressions*. Nonetheless, we intend to implement the concentration-based TMDLs and allocations, consistent with the aforementioned USEPA guidance {USEPA, 2007(b)}. As such, daily load expressions presented in Appendix H: *Daily Load Expressions* represent an alternative way to express concentration-based allocations, but the mass-based daily load expressions do not formally constitute the TMDL or the allocations.

5.5 Margin of Safety

The TMDL requires a margin of safety component that accounts for the uncertainty about the relationship between the pollutant loads and the quality of the receiving water (CWA 303(d)(1)(C)). For this project, a margin of safety has been established implicitly through the use of protective numeric targets, which are, in this case, the water quality objectives for water contact recreational uses.

The total and fecal coliform TMDLs for the water bodies in this project are the Water Board’s Basin Plan objectives. When other conditions cause degradation of water quality beyond the levels or limits established as water quality objectives, controllable conditions shall not cause further degradation of water quality” (Basin Plan, p. III-2). Because the allocation for controllable sources is set at the numeric targets, if achieved, these allocations will achieve the water quality objectives in the receiving water. Thus, in this TMDL there is no uncertainty that controlling the load from controlled sources will positively affect water quality by reducing the fecal indicator bacteria contribution.

However, in certain locations there is a possibility that non-controllable, or, natural sources will themselves occur at levels exceeding water quality objectives. And while it is controllable water quality conditions (“actions or circumstances resulting from man’s activities” (Basin Plan, p. III-2)) that must conform to water quality objectives, receiving water quality will contain discharge from both controllable and natural sources.

Reporting and monitoring will indicate whether the allocations from controllable sources are met, thereby minimizing any uncertainty about the impacts of loads on the water quality.

5.6 Critical Conditions and Seasonal Variation

Critical conditions occur when the prescribed load allocation results in achieving the water quality standard by a narrow margin. The condition is considered critical because any unknown factor regarding environmental conditions or the calculation of the load allocation could result in not achieving the water quality standard. Therefore, critical conditions are particularly important with load-based allocations and TMDLs. However, this TMDL is a concentration-based TMDL. As such, the numeric targets and allocations are the concentrations equal to the water quality objectives. Therefore, there exists no uncertainty as to whether the allocations and TMDLs will result in achieving water quality objectives.

Staff determined there is no sustained or apparent pattern of seasonal variation based on review of the monitoring data; exceedances were found at monitoring site 317CHO year-round based on temporal analysis of exceedances (see Figure 2-7), and flow duration analysis (see Appendix G: *Load Duration Curves*). Any variability is accounted for and addressed by use of the allocations equal to the REC-1 water quality objective which assures the loading capacity of the water body be met under all flow and seasonal conditions.

6 IMPLEMENTATION AND MONITORING

6.1 Implementation Plan

The purpose of the Implementation Plan is to describe the steps necessary to reduce pathogen loads and to achieve these TMDLs. The Implementation Plan identifies the following: 1) parties responsible for taking these actions 2) actions expected to reduce pathogen loading; 3) mechanisms by which the Central Coast Water Board will assure these actions are taken; 4) reporting and evaluation requirements that will indicate progress toward completing the actions; 5) and a timeline for completion of implementation actions.

The Implementation Plan also outlines economic considerations to achieve compliance. A monitoring plan designed to measure progress toward water quality goals is included in Section 6.5.

6.2 Implementing Parties

Table 6-1 identifies the probable sources contributing to fecal coliform impairment and the parties responsible for implementation of this TMDL.

Table 6-1. Source Categories and Implementing parties.

| Source Category | Implementing Parties |
|-----------------|---|
| Livestock | Owners and Operators of Lands Containing Domestic Animals |
| Wildlife | Not Subject to Regulation |

6.3 Existing Plans and Policies

6.3.1 California Impaired Waters Policy and Impaired Waters Guidance

The State of California *TMDL Guidance: A Process for Addressing Impaired Waters in California* (SWRCB, 2005) and the *Water Quality Control Policy for Addressing Impaired Waters: Regulatory Structure and Options* (SWRCB, 2005) provide guidance and policy that describe the process for developing and adopting TMDLs.

The Policy states that the Water Boards “*have broad flexibility and discretion in fashioning TMDL implementation programs and are encouraged to be as innovative and creative as possible and, as appropriate, to build upon Third-Party Programs.*” Accordingly, the policy indicates that in developing and adopting TMDLs the Boards may use any combination of existing regulatory tools to do so. Existing regulatory tools include individual or general waste discharge requirements (be they under Chapter 4 or under Chapter 5.5 (NPDES permits) of the Porter-Cologne Water Quality Control Act), individual or general waivers of waste discharge requirements, enforcement actions, interagency agreements, regulations, basin plan amendments, and other policies for water quality control.

In summary, the Impaired Waters Policy states that TMDLs may be adopted in any of the following ways:

1. *Multiple actions of the Water Board*: If multiple actions by the Water Board are required, the solution must be implemented through a Basin Plan amendment or other regulation.
2. *Single Vote of the Water Board*: In some circumstances a single discharger may be responsible for the impairment or a single order of the Water Board may be adequate to address the impairment. If the solution can be implemented with a single vote of the Water Board, it may be implemented by that vote. When an implementation plan can be adopted in a single regulatory action, such as a permit, a waiver, or an enforcement order, etc., there is no legal requirement to first adopt the plan through a Basin Plan amendment.
3. *Regulatory Action of Another State, Local, or Federal Agency*: If the Water Board finds that a proposed solution will correct the impairment, the Water Board may certify that the regulatory action will correct the impairment and, if applicable, implement the assumptions of the TMDL, in lieu of adopting a redundant program.
4. *Nonregulatory Action of Another Entity*: If the Water Board finds that the action will correct the impairment, the Water Board may certify that the nonregulatory action will correct the impairment and, if applicable, implement the assumptions of the TMDL, in lieu of adopting a redundant program.
5. *Voluntary Actions by Nonregulatory Entities*: Such actions are appropriate if the Water Board makes findings, supported by substantial evidence in the project record, that a program being implemented by a nonregulatory entity will be adequate to correct the impairment.

Note that in accordance with the Impaired Waters Policy, in some circumstances the Water Boards may rely upon actions by non-regulatory entities, if the Water Board makes findings that a program being implemented by a non-regulatory entity will be adequate to correct the impairment. The Impaired Waters Guidance states:

“The fact Regional Boards have limited resources to accomplish their water quality mission can and should be used as a basis to encourage interested persons to undertake to abate impairments in the time before the Regional Boards may otherwise be able to address them...Employing these abbreviated procedures when warranted is a matter of efficiency and resource allocation. California is obligated to establish and implement 800 or more TMDLs over the next ten years for over 1,800 pollutant/water body combinations. Given existing resource constraints (both financial and personnel), to the extent California can consolidate regulatory actions or eliminate unnecessary regulatory processes when fulfilling our obligations under Section 303(d), the State and Regional Boards can expedite their responsibility to address and correct impaired waters in California, and expend resources on more TMDLs instead of redundant processes.” *

**Emphasis added*

From: STATE OF CALIFORNIA S.B. 469 TMDL GUIDANCE A PROCESS FOR ADDRESSING IMPAIRED WATERS IN CALIFORNIA (California State Water Resources Control Board, June 2005 - Approved by Resolution 2005-0050)

Consequently, the State Impaired Water policy establishes a certification process whereby the Water Boards can formally recognize appropriate regulatory or nonregulatory actions of other entities as alternative implementation programs when the Water Boards determine those actions will result in attainment of standards. For alternative programs intended to control non-point source contributions to an impairment, such programs must be consistent with the Key Elements of an NPS Pollution Control Implementation Program (see Section 6.3.3), pursuant to the SWRCB Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program.

While the State Impaired Waters policy recognizes that certification of alternative programs of implementation may be merited as appropriate and as a matter of efficiency, it is important to emphasize the Water Board retains the authority to commence a regulatory response if an impairment has not been adequately addressed by a non-regulatory action within a specified time period. The Water Board may not indefinitely defer taking necessary action if another entity is not properly addressing a problem. Note that a regulatory response by the Water Board must use the administrative permitting authorities as outlined in the Nonpoint Source Implementation and Enforcement policy (see Section 6.3.3).

6.3.2 California Nonpoint Source Program Plan

The Nonpoint Source Program is a regulatory strategy aimed at addressing nonpoint source pollution throughout the State of California. In July 2000 the State Water Resources Control Board and the California Coastal Commission developed the *Plan for California's Nonpoint Source Pollution Control Program* to reduce and prevent nonpoint source pollution in California, expanding the State's nonpoint source pollution control efforts. This effort represented the first significant upgrade of California's Nonpoint Source Pollution Control Program since its inception in 1988. The Nonpoint source Program was revised to enhance efforts to protect water quality and to conform to the Clean Water Act Section 319 (CWA 319) and the Coastal Zone Act Reauthorization Amendments Section 6217 (CZARA). The lead state agencies for the NPS Program are the State Water Board, the nine Regional Water Boards and the California Coastal Commission. The NPS Program's long-term goal is to “improve water quality by implementing the management measures identified in the California Management Measures for Polluted

Runoff Report (CAMMPR) by 2013. Under the California NPS Program Pollution Control Plan, TMDLs are considered one type of implementation planning tool that will enhance the State's ability to foster implementation of appropriate NPS management measures.

6.3.3 Policy for Implementation and Enforcement of the Nonpoint Source Program

The *Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program* adopted in August 2004, explains how Water Board authorities granted by the Porter-Cologne Water Quality Control Act will be used to implement the California NPS Program Plan (see Section 6.3.2). The *Nonpoint Source Implementation and Enforcement Policy* requires the Regional Water Boards to regulate all nonpoint sources (NPS) of pollution using the administrative permitting authorities provided by the Porter-Cologne Act. Nonpoint source dischargers must comply with Waste Discharge Requirements (WDRs), waivers of WDRs, or Basin Plan Prohibitions by participating in the development and implementation of Nonpoint Source Pollution Control Implementation Programs. NPS dischargers can comply either individually or collectively as participants in third-party coalitions. (The "third-party" Programs are restricted to entities that are not actual dischargers under Regional Water Board permitting and enforcement jurisdiction. These may include Non-Governmental Organizations, citizen groups, industry groups, watershed coalitions, government agencies, or any mix of the these.) All Programs must meet the requirements of the following five key elements described in the NPS Implementation and Enforcement Policy. Each Program must be endorsed or approved by the Regional Water Board or the Executive Officer (if the Water Board has delegated authority to the Executive Officer).

- Key Element 1: A Nonpoint Source Pollution Control Implementation Program's ultimate purpose must be explicitly stated and at a minimum address NPS pollution control in a manner that achieves and maintains water quality objectives.
- Key Element 2: The Program shall include a description of the management practices (MPs) and other program elements dischargers expect to implement, along with an evaluation program that ensures proper implementation and verification.
- Key Element 3: The Program shall include a time schedule and quantifiable milestones, should the Regional Water Board require these.
- Key Element 4: The Program shall include sufficient feedback mechanisms so that the Regional Water Board, dischargers, and the public can determine if the implementation program is achieving its stated purpose(s), or whether additional or different MPs or other actions are required (See Section 12, Monitoring Program).
- Key Element 5: Each Regional Water Board shall make clear, in advance, the potential consequences for failure to achieve a Program's objectives, emphasizing that it is the responsibility of individual dischargers to take all necessary implementation actions to meet water quality requirements.

6.3.4 Central Coast Basin Plan

The Central Coast Basin Plan provides the Water Board's goals and description of general control actions with regard to discharges from rangeland (Basin Plan, Chapter 4, section VIII.C.6.), as reproduced below.

The Water Board encourages grazing strategies that maintain adequate vegetative cover to reduce erosion and sedimentation. The Water Board promotes dispersal of livestock away from surface waters as an effective means of reducing nutrient and pathogen loading. The Water Board encourages use of Best Management Practices to improve water quality, protect beneficial uses, protect stream zone and lakeshore areas, and improve range and watershed conditions including:

- *Implementing rest-rotation grazing strategies*
- *Changing the season of use (on/off dates)*
- *Limiting the number of animals*
- *Increasing the use of range riders to improve animal distribution and use of forage*
- *Fencing to exclude livestock grazing in sensitive areas*
- *Developing non-stream zone watering sites*
- *Conducting physical improvements such as restoring riparian habitat.*

These same Best Management Practices may result in improved range and increased forage production, resulting in increased economic benefit to the rancher and land owner. The Water Board also encourages land owners to develop appropriate site-specific Best Management Practices using the technical assistance of the U.S. Soil Conservation Service and the U.S. EPA.

The Basin Plan states that in addition to relying on the grazing management expertise of agencies such as the U.S. Forest Service, U.S. Bureau of Land Management, or Range Management Advisory Committee the Water Board can directly regulate grazing activities to protect water quality, under the authorities granted to it by the Porter-Cologne Water Quality Control Act.

6.3.5 California Rangeland Water Quality Management Plan

The California Rangeland Water Quality Management Plan was developed by the Rangeland Management Advisory Committee, a statutory committee which advises the California Board of Forestry on rangeland resources. The Committee developed a California Rangeland Water Quality Management Plan (Rangeland Plan) which concludes that ranches should complete Rangeland Water Quality Management Plans for their respective ranches. The Rangeland Plan was accepted by the State Board in 1995 (SWRCB Resolution No. 95-43). It summarizes authorities and mandates for water quality and watershed protection on non-federal rangelands, and specifies a framework for the cooperative development of ranch management strategies for water quality protection. The Rangeland Plan also describes sources of technical and financial assistance available to ranch owners.

The California Rangeland Plan was developed by a broad array of interest groups, including livestock interests, and is supported by the grazing industry. The State formally incorporated the Rangeland Water Quality Management Plan for private rangelands into SWRCB Nonpoint Source Program Plan (see Section 6.3.2)

The Rangeland Plan states that where beneficial uses of waters are impaired or threatened by rangeland operations as determined by the Water Board, land owners shall assess the impact of their operations on beneficial uses; show the existence of a viable Rangeland Plan with implementation underway; prepare and implement a nonpoint source management plan (as described in section 2.b. or the Rangeland Plan); or contact the NRCS, RCD, UC Cooperative Extension, or a qualified resource professional of their choice, to schedule an assessment and begin development of a Rangeland Plan.

6.4 Implementation Mechanism for Cholame Creek TMDL

Implementation of the TMDL is the responsibility of owners/operators of lands containing domestic animals. The implementation program does not specify the means of compliance with the TMDL. The Water Board is prohibited by Section 13360 of the California Water Code from specifying the manner of compliance with its orders. Rather, the implementation plan establishes a process for achieving the TMDL, including: 1) identifying parties responsible for taking these actions 2) actions expected to reduce pathogen loading; 3) mechanisms by which the Central Coast Water Board will assure these actions are taken; 4) reporting and evaluation requirements that will indicate progress toward completing the actions; 5) and a timeline for completion of implementation actions. The implementation program will involve an adaptive management approach.

In accordance with the California Impaired Waters policy the Water Board may exercise its independent discretion to certify that a nonregulatory action will correct the impairment if supported by findings in the record. The Impaired Waters Guidance explicitly states that the fact that the Regional Boards have limited resources to accomplish their water quality mission can and should be used as a basis to encourage non-regulatory entities to undertake to abate impairments in the time before the Water Boards may otherwise be able to address them through a formal regulatory program. On these occasions the Water Board may not always need to adopt its own implementation program, but may instead rely upon the program adopted by the other entity. When doing so, the RWCQB should establish the TMDL via a formal recognition which certifies that RWQCB has determined that the other entity's program will comply with the TMDL and attain standards. This approach is consistent with the State Water Resources Control Board's Impaired Waters Guidance which states: *"Employing these abbreviated procedures when warranted is a matter of efficiency and resource allocation. California is obligated to establish and implement 800 or more TMDLs over the next ten years for over 1,800 pollutant/water body combinations. Given to the extent California can consolidate regulatory actions or eliminate unnecessary regulatory processes when fulfilling our obligations under Section 303(d), the State and Regional Boards can expedite their responsibility to address and correct impaired waters in California, and expend resources on more TMDLs instead of redundant processes."*

Note that certifying a non-regulatory response to implement a TMDL does not preclude the Water Board's authority to develop a regulatory response, should the non-regulatory action be ultimately deemed inadequate to implement the TMDL. Consistent with the State Water Resources Control Board's policy and guidance for developing TMDLs (see Section 6.3.1), where appropriate the Water Board may exercise its independent discretion to certify non-regulatory actions to implement a TMDL; however, when Water Board priorities and resources are available to commence regulatory action on an unresolved nonpoint source impairment, the Water Board is obligated to use the permitting authorities as outlined in the Nonpoint Source Implementation and Enforcement policy (see Section 6.3.3)

Accordingly, staff proposes that the Water Board certify the California Rangeland Water Quality Management Plan (Rangeland Plan) as the mechanism for implementing this TMDL. Note that in accordance with the Impaired Waters Guidance, the Water Board may use its independent discretion to implement TMDLs through Memorandums of Understanding (MOUs), Management Agency Agreements (MAAs), or Water Quality Management Plans (WQMP). Examples of TMDLs that have been implemented by using MOUs, MAAs, or WQMPs include *Salmon River Temperature TMDL*, 2006 (MOU with U.S. Forest Service), *San Joaquin River at Vernalis Salt and Boron TMDL*, 2008 (MAA with U.S. Bureau of Reclamation), and the *Indian Creek Reservoir TMDL*, 2002 (Rangeland Plan for non-federal grazing lands).

The California Rangeland Water Quality Management Plan was accepted by the State Board in 1995. The grazing industry gave its support to the California Rangeland Plan (SWRCB Resolution No. 95-43). Further, the State formally recognized and incorporated California Rangeland Plan for private rangelands in the SWRCB Nonpoint Source Program Plan (see Section 6.3.2). The SWRCB Nonpoint Source Program Plan identifies the California Rangeland Water Quality Management Plan (along with several other MOUs, MAAs, and WQMPs) as recognized and viable nonpoint source pollution control tools (see Table 10 –*Summary of Existing MAAs and MOUs* located in *Plan for California's Nonpoint Source Pollution Control Program*, SWRCB 2000).

The Rangeland Plan also provides that where beneficial uses of water are impaired or threatened, as determined by the Water Board, ranch owners shall assess and report to the Water Board the impact of their operations on beneficial uses; show the existence of a viable Rangeland Plan with implementation underway; prepare and implement a nonpoint source management plan (as described in section 2.b. or the Rangeland Plan); or contact the NRCS, RCD, UC Cooperative Extension, or a qualified resource professional of their choice, to schedule an assessment and begin development of a Rangeland Plan.

6.4.1 For Control of Pathogen Loading - Milestones

The implementation process will include the following.

- 1) By five years after final approval of the TMDL, Water Board staff and stakeholders will identify specific sites within the TMDL project area contributing controllable fecal coliform loads to Cholame Creek that need management measures for pathogen control. Problem assessment and planning for management measure implementation on non-federal rangelands will follow the implementation procedures in the California Rangeland Water Quality Management Plan (July 1995).
- 2) By eight years after final approval of the TMDL, depending on progress toward management measure implementation under the 1995 California Rangeland Water Quality Management Plan and the 2000 California Nonpoint Source Plan, staff will consider the need for regulatory action to ensure implementation of management measures to control external sources of fecal coliform loading to Cholame Creek.
- 3) By 12 years from the date the TMDL becomes effective (which is upon approval by the Water Board), management practices will be fully implemented for nonpoint sources of fecal coliform loading and the load the allocations, and therefore the TMDL, will be achieved

In accordance with Section 13360 of the California Water Code the Water Board cannot mandate or designate the specific types of on-site actions necessary to reduce indicator bacteria loading, or to meet allocations by the various responsible parties. Potential implementation measures identified in the California Rangeland Water Quality Management Plan (1995) include:

1. LIVESTOCK MANAGMENT

Practices which assist with the control, time, frequency, or intensity of grazing to maintain vegetative cover sufficient to protect the soil and maintain or improve the quantity and quality of desired vegetation (e.g. prescribed grazing, feeding and salting locations, etc.)

2. STRUCTURAL IMPROVEMENTS

Infrastructure improvements (e.g. water development, fencing, erosion control, etc.) and structures associated with normal livestock production operations (barns, sheds, corrals, shipping pens, etc.) may be used to facilitate grazing management. These practices should be planned, constructed, and utilized in a manner that enhances or maintains water quality.

3. LAND TREATMENT

Land treatments (e.g. burning, mechanical manipulation, seeding, weed control, fertilization, etc.) may be used to manage vegetation, reduce erosion, improve range or improve wildlife habitat.

4. LIVESTOCK HEALTH

Practices used to reduce internal/external parasites and pathogens.

Potential implementation measures are also identified in the *California Nonpoint Source Program Plan (2000) - California Management Measures for Polluted Runoff (CAMMPR)*, as reproduced below:

Grazing Management. Management Measure 1E is intended to protect sensitive areas (including streambanks, lakes, wetlands, estuaries, and riparian zones) by reducing direct loadings of animal wastes and sediment. This may include restricting or rotationally grazing livestock in sensitive areas by providing fencing, livestock stream crossings, and by locating salt, shade, and alternative drinking sources away from sensitive areas. Upland erosion can be reduced by, among other methods: (1) maintaining the land consistent with the California Rangeland Water Quality Management Plan or Bureau of Land Management and Forest Service activity plans or (2) applying the range and pasture components of a Resource Management System (NRCS FOTG). This may include prescribed grazing, seeding, gully erosion control, such as grade stabilization structures and ponds, and other critical area treatment.

6.5 Monitoring and Reporting

Consistent with the California Rangeland Water Quality Management Plan (Rangeland Plan), implementation will be conducted in concert with monitoring and reporting to the Water Board, so that progress in achieving the TMDL can be demonstrated.

The primary measure of success for this TMDL is attainment or continuous progress toward attainment of the TMDL targets and load allocations. However, in evaluating successful implementation of this TMDL, attainment of trackable implementation actions will also be heavily relied upon. Therefore, staff proposes a two-phased approach to monitoring for this TMDL:

- 1) Monitoring of implementation of actions; and
- 2) Water quality monitoring

Staff proposes to focus on implementation monitoring during the early years of TMDL implementation. Staff anticipates that water quality response to improved management practices will not occur or be demonstrated until after improved management practices are implemented. Staff will work with implementing parties to develop a suite of monitoring and reporting methods consistent with the California Rangeland Plan that could include self-assessment site inspections, photo monitoring by implementing parties, water quality testing, reporting of land and animal management practices implemented, and other methods that will assist in achieving water quality improvements and allow the Water Board to track/verify the implementation of management practices. Staff will work with parties responsible for monitoring when the implementation and monitoring phase of the project commences, and will make revisions, if appropriate, to the proposed monitoring plan outlined below.

6.5.1 Implementation Monitoring

In accordance with the California Rangeland Water Quality Management Plan (RWQMP), where beneficial uses have been impaired as determined by the Water Board, land owners/operators contributing to the impairment will be asked by the Water Board to:

1. assess the impact of their operations on beneficial uses, and
2. prepare and implement a nonpoint source management plan as described in section 2b, approach #2 or #3, of the RWQMP;

or,

1. show existence of a viable RWQMP with implementation underway, or
2. contact the NRCS, RCD, UCCE, or a qualified resource professional of their choice, to schedule an assessment and begin development of a RWQMP.

Consistent with the California Rangeland Water Quality Management Plan (RWQMP), if owners/operators contributing to the impairment do not respond to the Water Board's request to develop and implement a viable RWQMP or nonpoint source management plan; do not demonstrate the existence of a viable RWQMP with implementation underway, and/or do not demonstrate a good faith effort towards implementation of recommended management practices where appropriate, the Water Board will require the appropriate technical information or reports to be submitted via authorities granted to the Water Board in Section 13267 of the Porter Cologne Water Quality Control Act.

6.5.2 Water Quality Monitoring

Staff anticipates that water quality response to improved management practices will not occur or be demonstrated until after management practices are implemented. Accordingly, after significant progress on improved management practices has been demonstrated/implemented, Central Coast Water Board will request that the responsible parties perform fecal coliform monitoring in receiving waters to verify progress towards TMDL achievement. Water Board staff

will work with parties responsible for monitoring regarding the scope and timelines for submission of water quality monitoring data. Landowners have the option of performing individual monitoring or participating in a cooperative monitoring program. Monitoring may be done in concert with, or supplemented by the Water Board's CCAMP existing five-year rotational monitoring in the project area, or with other appropriate monitoring entities. If necessary, the Water Board will require the collection and submission of water quality monitoring data pursuant to authorities granted in Section 13267 of the Porter Cologne Water Quality Control Act.

The following monitoring plan proposes specific monitoring sites, frequency, and indicators to be monitored. To limit the burden of monitoring to the minimum amount necessary to evaluate attainment of the TMDL and compliance with allocations, staff identified a receiving water monitoring location at the following location, shown in Table 6-2. This site is appropriate to assess TMDL compliance because this creek reach has sustained or perennial flows (refer back to Figure 2-4) which are necessary to evaluate the 30-day geometric mean water quality objectives/criteria.

At this time, due to the size of the watershed, and limited water quality data from only one site (317CHO) the spatial extent of the impairment is not known. If appropriate, staff will work with implementing parties to select additional or alternate indicator bacteria monitoring site(s), to establish baseline water quality conditions in upstream reaches of the watershed, subject to Executive Officer approval. Potential additional monitoring sites are identified in Table 6-3. These sites were identified on the basis of reporting of cattle grazing operations present in the vicinity (see Section 4.3.1), and/or the presence of reportedly sustained or perennial flows in the creek channel (refer back to Figure 2-4).

Table 6-2. Proposed monitoring location for assessing TMDL compliance.

| Site Code | Waterbody | Site Location | Latitude | Longitude |
|---------------------|---------------|-----------------------------------|-------------|-------------|
| 317CHO ^A | Cholame Creek | Cholame Creek at Bitterwater Road | 35.70981498 | -120.303836 |

^A Central Coast Ambient Monitoring Program (CCAMP) Site Code

Table 6-3. Additional potential monitoring sites to establish watershed baseline conditions.

| Waterbody | Site Location | Latitude | Longitude | Notes |
|----------------------|---|----------|-----------|--|
| Cottonwood Creek | Cottonwood Creek near confluence with Cholame Creek | 35.806 | -120.339 | Baseline monitoring to establish upstream extent of impairment |
| Little Cholame Creek | Little Cholame Creek near confluence with Cholame Creek | 35.885 | -120.434 | Baseline monitoring to establish upstream extent of impairment |
| Cholame Creek | Cholame Creek at Highway 46 | 35.663 | -120.362 | Downstream watershed outlet of Cholame Creek above confluence with Estrella River. |

The monitoring frequency required at a receiving water site must satisfy the minimum number of samples needed to evaluate compliance with the Basin Plan water quality objective for indicator organisms in REC-1 waters (five samples must be drawn in a 30-day period). As such, responsible parties will monitor receiving waters according to the following schedule:

Receiving Waters – Five samples from each monitoring site collected over one 30-day period in each of the following seasons:

- ✓ Wet Season: December 1 – March 31

- ✓ Dry Season: May 1 – September 30

The wet season time frame of December 1 to March 31 was identified because precipitation data show that mean rainfall intensity in the project area is greatest from December through March (see NCDC Parkfield weather station 046703 data available at <http://www.wrcc.dri.edu/coopmap/>).

If five samples are not collected or available for the 30-day averaging period, the available data shall be evaluated consistent with Section 6.1.5.6 of the SWRCB Listing Policy (SWRCB, 2004)

Also, individual landowner monitoring can comprise either water quality monitoring or other forms of monitoring (such as a report documenting visual site inspections supported by site photos). Central Coast Water Board staff will review data annually to determine compliance with the TMDL. If the Executive Officer determines additional monitoring is needed, the Executive Officer shall request it pursuant to applicable sections of the California Water Code.

6.6 Timeline and Milestones

6.6.1 Timeline to Achieve Loading Capacity

Staff anticipates that the allocations, and therefore the TMDL, will be achieved 12 years from the date the TMDL becomes effective (which is upon approval by the USEPA). This estimation is in part based on the amount of time necessary to identifying responsible parties of the nonpoint source prohibition. The estimation is also based on the uncertainty of the time required for in-stream water quality improvements resulting from management practices to be realized. Staff anticipates that the full in-stream positive effect of all the management measures will be realized gradually, and progress towards achieving load allocations will be evaluated consistent with the timeline milestones presented in Section 6.4.1.

The Central Coast Water Board will consider additional requirements if implementation of management practices do not result in achievement of water quality objectives.

6.6.2 Evaluation of Progress

It is important to monitor water quality progress, track TMDL implementation, and modify TMDLs and implementation plans as necessary, in order to assess trends in water quality to ensure that improvement is being made; oversee TMDL implementation to ensure that implementation measures are being carried out; address any uncertainty in various aspects of TMDL development; and ensure that the TMDL remains effective, given changes that may occur in the watershed after TMDL development.

The primary measure of success for this TMDL is attainment or continuous progress toward attainment of the TMDL targets and load allocations. However, in evaluating successful implementation of this TMDL, attainment of trackable implementation actions will also be heavily relied upon. Therefore, we propose two types of monitoring for this TMDL: 1) water quality monitoring, and 2) monitoring of implementation of actions.

Water Board staff will perform annual reviews of implementation actions, monitoring results, and evaluations submitted by responsible parties of their progress towards achieving their allocations. The Central Coast Water Board will use information submitted by implementing parties (as outlined in previously in Section 6.5), Central Coast Ambient Monitoring Program

data, and other available information to determine progress toward implementing required actions and achieving the allocations and the numeric target.

Responsible parties will continue monitoring and reporting according to this plan for at least five years, at which time the Water Board staff will determine the need for continuing or otherwise modifying the monitoring requirements. Additionally, within 5 years of TMDL adoption staff will consider the need for regulatory action to ensure implementation of management measures to control fecal coliform loads consistent with the timeline presented in Section 6.4.1.

Responsible parties may also demonstrate that although water quality objectives are not being achieved in receiving waters, controllable sources of pathogens are not contributing to the exceedance. If this is the case, the Water Board staff may re-evaluate the numeric target and allocations. For example, the Water Board staff may consider the need for a site-specific objective. The site-specific objective would be based on evidence that natural, or background sources alone were the cause of exceedances of the Basin Plan water quality objective for fecal indicator bacteria.

Annual reviews will continue until the water quality objectives are achieved, or another regulatory action establishes alternative requirements. The compliance schedule for achieving the allocations and numeric target required under these TMDLs is ten years after the date of approval by the Central Coast Water Board.

6.7 Cost Estimates and Funding Sources

Staff provides estimates of total implementation costs below in Appendix I: *Cost Estimates*. These costs are approximations and come with significant uncertainties, since the number of properties that will require implementation is unknown, and also because the Water Board cannot mandate or designate the specific types of on-site actions necessary to reduce indicator bacteria loading, or to meet allocations by the various responsible parties.

Potential sources of financing to TMDL implementing parties are also provided in Appendix I: *Cost Estimates*:

7 PUBLIC PARTICIPATION

Staff conducted stakeholder outreach efforts for these TMDL projects. Staff scheduled public workshops in San Luis Obispo (January 20, 2011) and King City (February 9, 2011) and engaged with interested persons during the development of the TMDL. Interested persons that participated in TMDL development workshops and outreach included representatives from the following:

- California Cattlemen's Association
- University of California Cooperative Extension
- Hearst Ranch
- California Polytechnic University
- District Representative for State Senator Sam Blakeslee
- Commercial ranches and private landowners
- San Luis Obispo Farm Bureau
- San Luis Obispo County Cattlemen's Association
- Monterey County Cattlemen's Association

This Staff Report, Executive Officer Certification Order, and technical project reports were made available for a 45-day formal public comment commencing on February 3, 2011. Comments provided at workshops during the public comment period will be considered prior to issuing the final TMDL certification.

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| |
|---|
| APPENDIX A: WATER QUALITY DATA AND FIELD NOTES |
|---|

| Sampling Site | Date | Fecal Coliform Concentration (mpn/100mL) | <i>E. Coli</i> Concentration (mpn/100mL) | Total Coliform Concentration (mpn/100mL) | Sampling Entity |
|---------------|------------|--|--|--|-----------------|
| 317CHO | 2/2/1999 | 500 | | 3000 | CCAMP |
| 317CHO | 3/2/1999 | 110 | | 140 | CCAMP |
| 317CHO | 4/7/1999 | 1600 | | 5000 | CCAMP |
| 317CHO | 5/13/1999 | 3000 | | 5000 | CCAMP |
| 317CHO | 6/2/1999 | 3000 | | 5000 | CCAMP |
| 317CHO | 6/30/1999 | 800 | | 11000 | CCAMP |
| 317CHO | 7/29/1999 | 160000 | | 160000 | CCAMP |
| 317CHO | 1/25/2000 | 2300 | | 9000 | CCAMP |
| 317CHO | 2/8/2000 | 170 | | 1600 | CCAMP |
| 317CHO | 1/26/2006 | 90 | 20 | 1600 | CCAMP |
| 317CHO | 3/2/2006 | 300 | 120 | 300 | CCAMP |
| 317CHO | 3/30/2006 | 7000 | 4900 | 30000 | CCAMP |
| 317CHO | 4/27/2006 | 1300 | 910 | 2400 | CCAMP |
| 317CHO | 5/24/2006 | 800 | 1100 | 3000 | CCAMP |
| 317CHO | 7/20/2006 | 500 | 200 | 5000 | CCAMP |
| 317CHO | 8/16/2006 | 500 | 400 | 1700 | CCAMP |
| 317CHO | 9/21/2006 | 300 | 37 | 300 | CCAMP |
| 317CHO | 10/19/2006 | 1400 | 610 | 1400 | CCAMP |
| 317CHO | 11/9/2006 | 500 | 520 | 500 | CCAMP |
| 317CHO | 12/13/2006 | 80 | 26 | 2400 | CCAMP |
| 317CHO | 1/10/2007 | 50 | 83 | 70 | CCAMP |
| 317CHO | 2/15/2007 | 130 | 52 | 900 | CCAMP |

CCAMP = Central Coast Ambient Monitoring Program

CCAMP Field Notes

| | | |
|--------|--------------------|--|
| 317CHO | 3/2/99 14:40 | Conductivity not reported |
| 317CHO | 4/7/99 13:15 | clear skies |
| 317CHO | 5/13/99 13:30 | clear skies, warm |
| 317CHO | 6/2/99 13:30 | cloudy and intermittent showers |
| 317CHO | 6/30/99 9:45 | clear skies, warm |
| 317CHO | 7/29/99 12:00 | clear skies |
| 317CHO | 9/2/99 10:30 | DRY |
| 317CHO | 9/30/99 9:00 | DRY |
| 317CHO | 11/4/99 9:15 | Dry, clear skies, warm |
| 317CHO | 11/9/99 14:40 | DRY |
| 317CHO | 12/2/99 13:50 | DRY |
| 317CHO | 1/6/00 13:30 | DRY |
| 317CHO | 1/25/00 8:35 | Lab measurements only |
| 317CHO | 1/25/00 8:36 | Field measurements only |
| 317CHO | 1/26/06 11:38 | water color-yellow. Water clarity=clear. Hand sampled thalweg Site odor-cows/anoxic sediment. All shading is from sedges in stream. Barn owl roosts under bridge. Sent chlor a filter to lab- 200 mL filtered |
| 317CHO | 3/2/06 13:11 | water color-yellow. water clarity-clear. Hand sampled thalweg.barn owl roosting under bridge. Site odor-cows/manure |
| 317CHO | 3/30/06 9:56 | water color-yellow. water clarity-cloudy. Hand sampled mid channel. Evidence of recent scour. Flushed barn owl from under bridge. Swallows feeding overhead. Red-winged blackbirds colonizing in instream begetation. Lots of flushed reeds in channel. Brush debris |
| 317CHO | 4/27/06 9:45 | water color-yellow. water clarity-clear. Hand sampled thalweg. 500+ Swallows nesting under bridge. 5 barn owls flushed. Site and water odor-sulfides. Sent turbidity and chlor a filter to lab-filtered 200mLs(chlor a) |
| 317CHO | 5/24/06 9:32 | water color-yellow tint. Water clarity-clear. Bucket sampled thalweg. Many swallows nesting under bridge. Site odor-sulfides |
| 317CHO | 7/20/2006 9:10 | water color- yellow tint. Water clarity-clear. Hand sampled thalweg. Site and water odor-sulfides. Flow is trickling due in instream vegetation. Dead carcass on left bank. Evidence of cows. Swallows under bridge. |
| 317CHO | 8/16/2006 9:15 | water color-yellow tint. Water clarity-clear. Hand sampled mid channel. Site and water odor-sulfides. Evidence of cows. Flushed barn owl |
| 317CHO | 9/21/2006 9:14 | water color- yellow tint. Water clarity-clear. Hand sampled mid channel. Suspended solids.cows and pigs. Site odor-sulfides. Trash=junk food bags. Turbidity stored as non-detect (-0.05), but recorded it as 0 in the field |
| 317CHO | 10/19/2006 9:13 | water color-yellow. Water clarity-clear. Hand sampled mid channel. Site odor-sulfides. Evidence of cows. Trash=beverage containers. Hydrolab stored DO and DO % as 5.92 and 54.9, but recorded them in field as DO 6.25 and DO% 57.3. |
| 317CHO | 11/9/2006 9:12 | water color-colorless. Water clarity-clear. Hand sampled mid channel. Site and water odor-sulfides. Trash=5, beverage containers. Cow feces. |

| | | |
|--------|--------------------|--|
| 317CHO | 12/13/2006 9:14 | water color-colorless. Water clarity-clear. Hand sampled mid channel. Trash=beverage containers=10. Evidence of cows. Site and water odor-sulfides. Chlor a stored as 21.4, but recorded as 18.5 l the field. |
| 317CHO | 1/10/2007 9:44 | Water color-colorless Water clarity-clear. Hand sampled mid channel. Chlor a sample taken-filtered 200 mL. Trash=beverage containers. Instream vegetation estimation would be more but rushes appear dead. Evidence of cows. Dead pig in water. Site odor-sulfides |
| 317CHO | 2/15/2007 9:24 | Water color-colorless. Water clarity-clear. Hand sampled mid channel. Dead pig instream. Site odor-sulfides/death/decay. Hydrolab lost connection after recording #s, the stored after reconnection. |

APPENDIX B: SYNTHETIC FLOW RECORD

Cholame Creek does not have flow gage data. To develop flow duration curves, and ultimately conduct a load duration curve analysis, it is necessary to have a continuous flow record covering a broad range of flow conditions during times of water quality sampling in the impaired stream. Ungaged flow can be estimated for the impaired waterbody based on nearby USGS gages draining creeks with similar watershed characteristics, or from instantaneous flow measurements and water budget analyses from literature sources. Based on knowledge of climatic and unregulated flow conditions that would be expected in the The Cholame Creek watershed, USGS gage 11224500 at Los Gatos Creek Creek was used as a suitable reference gage. daily flow records after water year 2008, flow estimation techniques were used..

A simple and widely used analytical method to develop a flow record for ungaged watersheds, is the drainage area ratio method (DAR). The DAR method is a simple, widely used analytical approach for developing discharge for ungaged watersheds/sites using discharge data from gaged watersheds. DAR is recognized by USEPA as a standard flow estimation method for ungaged sites (USEPA, 2007(a) and 2007(b)). The DAR method is most reliable when land use characteristics of the ungaged and gaged watersheds are similar, and when the size ratio between the drainage areas of the ungaged site and the gaged site is between 0.3 and 1.5 (USGS, 2000). DAR assumes that flow at the ungaged stream is proportional to the ratio of the drainage areas between the ungaged stream, and the gaged stream. The DAR flow transfer method is calculated as:

$$Flow_{ungaged} = Flow_{gaged} \times \frac{Area_{ungaged}}{Area_{gaged}}$$

Because DAR simply assumes that the streamflow at an ungaged site is the same per unit area as a nearby hydrologically similar stream gaged station, and the method does not account for spatial variations in precipitation and runoff, the DAR method is generally best used for transferring flows between sites within the same drainage basin.

To minimize uncertainty in flow estimates in this project report, the State Water Resources Control Board DAR method (SWRCB, 2002) was used, making corrections for spatial variation in precipitation. Unlike the standard DAR method, which simply transfers flows between gaged and ungaged sites by making a correction based on the drainage area ratio (i.e., ratio of ungaged watershed size to the gaged watershed size), the SWRCB DAR method incorporates a correction factor for spatial precipitation variations. The SWRCB method can be used to transfer flow statistics from one drainage basin to another basin (personal communication, Bill Cowen, SWRCB). The DAR equation used by the SWRCB to estimate streamflow statistics is:

$$Q_{ug} = Q_g \times \frac{A_{ug}}{A_g} \times \frac{I_{ug}}{I_g} \quad (\text{equation 1})$$

Where

- Q_{ug} is the mean daily flow (cfs) at ungaged location.
- Q_g is the mean daily flow (cfs) at gaged location.
- A_{ug} is the watershed drainage area above the ungaged site (acres).
- A_g is the watershed drainage area above the gaged site (acres).

I_{ug} is mean annual precipitation in the ungaged watershed.
 I_g is mean annual precipitation in the gaged watershed.

USGS gage 11224500 (Los Gatos Creek, Fresno County), about 20 miles north of the TMDL project area was used as a reference gage for Cholame Creek. USGS 11224500, drains similar land uses, is similar size, and is characterized by similar climatic conditions.

The PRISM precipitation value associated with a pixel at the mean center of each watershed was assumed to represent mean annual precipitation in that watershed.

Using the SWRCB DAR relationship between the USGS 11224500 reference gage, and water quality monitoring site 317 CHO on Cholame Creek River is shown in the table below.

| Topography | Location | Drainage Area (sq. mi.) | DAR A_{ug}/A_g | Precipitation (inches) | Precipitation Ratio I_{ug}/I_g | Final Flow Adjustment Ratio |
|------------|---------------------------------|-------------------------|------------------|------------------------|----------------------------------|-----------------------------|
| Rolling | Los Gatos Creek @ USGS 11224500 | 95.8 | - | 16.5 | - | - |
| | Cholame Creek | 237 | 2.47 | 13.4 | 0.81 | 2.0 |

= Gaged Reference stream

Accordingly, estimated unregulated flow for Cholame Creek was derived from the 11224500 reference stream gage record using the flow adjustment ratio of 2.0. In other words, the mean daily 11224500 flow record was adjusted by a factor of 2.0, to derive a synthetic unregulated flow record for unregulated flow in Cholame Creek. The final flow record for Cholame Creek was then estimated by adding the daily dam release record data to the daily unregulated flow estimate. The flow duration summary for the flow record developed for water quality monitoring site 317CHO is shown in the figure below.

Microsoft Excel - !WQ Tool(Template)_317CHO

File Edit View Insert Format Tools Data Window Help

R4C15 fx

| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 |
|------------------------------|--------------|-----------|-------|--|----------------|--------------|-------------------|------------|------------|
| FLOW DURATION SUMMARY | | | | Station ID: 317CHO | | | | | |
| <i>Peak to Low</i> | | | | Station name: Cholame Creek at Bitterwater Road | | | | | |
| | <i>cfs</i> | <i>mm</i> | | 1-day | High | Moist | Mid | Dry | Low |
| 4 | 0.007% | 4998.00 | 19.92 | <i>Peak</i> | 532 | 46 | 2 | 0 | 0 |
| 5 | 0.01% | 2904.74 | 11.58 | | 2.119 | 0.183 | 0.009 | 0.000 | 0.000 |
| 6 | 0.27% | 531.72 | 2.12 | <i>1-day</i> | | | | | |
| 7 | 1% | 207.40 | 0.83 | | Average | | | | |
| 8 | 5% | 45.90 | 0.18 | | 12 | | | | |
| 9 | 10% | 14.43 | 0.06 | | 0.046 | 11.3% | 0.7 inches | | |
| 10 | 15% | 6.80 | 0.03 | | | | | | |
| 11 | 20% | 3.91 | 0.02 | | | | | | |
| 12 | 25% | 2.21 | 0.01 | | | | | | |
| 13 | 30% | 1.28 | 0.01 | | | | | | |
| 14 | 35% | 0.77 | 0.00 | | | | | | |
| 15 | 40% | 0.41 | 0.00 | | | | | | |
| 16 | 45% | 0.20 | 0.00 | | | | | | |
| 17 | 50% | 0.07 | 0.000 | | | | | | |
| 18 | 55% | 0.00 | 0.00 | | | | | | |
| 19 | 60% | 0.00 | 0.00 | | | | | | |
| 20 | 65% | 0.00 | 0.00 | | | | | | |
| 21 | 70% | 0.00 | 0.00 | | | | | | |
| 22 | 75% | 0.00 | 0.00 | | | | | | |
| 23 | 80% | 0.00 | 0.00 | | | | | | |
| 24 | 85% | 0.00 | 0.00 | | | | | | |
| 25 | 90% | 0.00 | 0.00 | | | | | | |
| 26 | 95% | 0.00 | 0.00 | | | | | | |
| 27 | 99% | 0.00 | 0.00 | | | | | | |
| 28 | 100% | 0.00 | 0.000 | <i>Low</i> | | | | | |
| 29 | | | | | | | | | |
| 30 | 11.3% | 11.61 | 0.05 | <i>Average</i> | | | | | |
| 31 | | | | | | | | | |

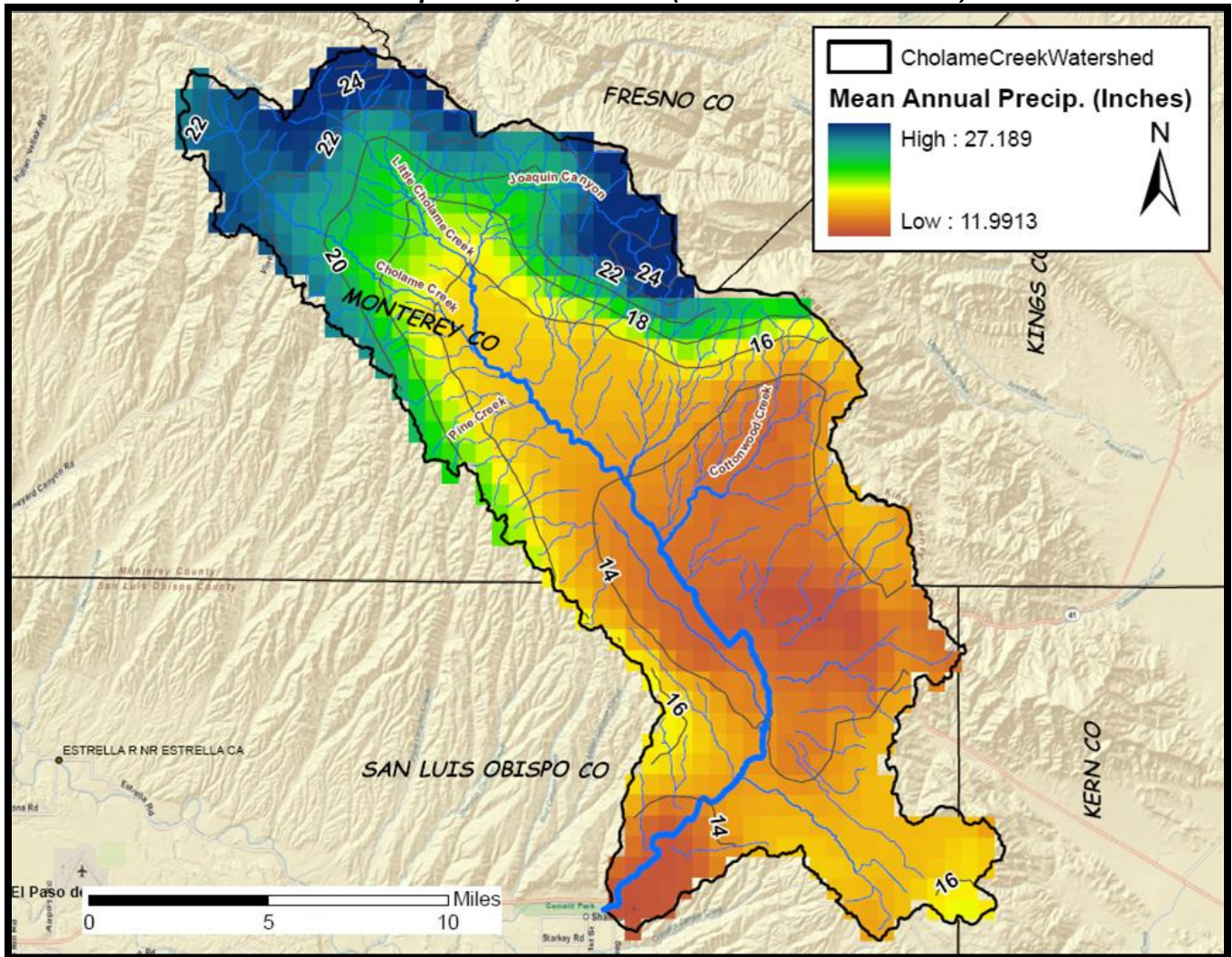
Site Info / Raw_Data / **Flow_Duration** / Load_Duration_Target / WQ_Data / Calc_Percentile

Draw AutoShapes

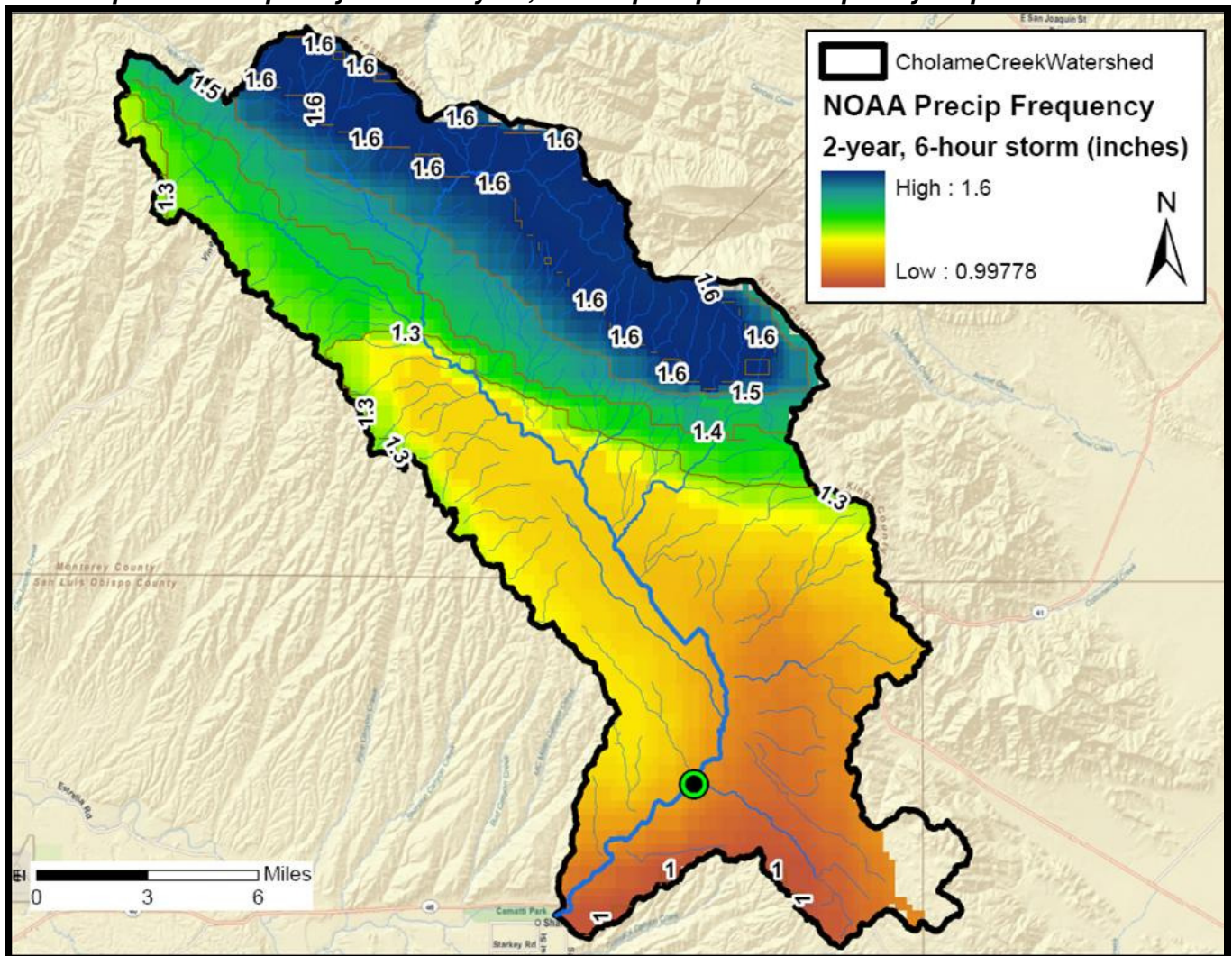
Ready

APPENDIX C: SUPPLEMENTAL MAPS AND SPATIAL DATA

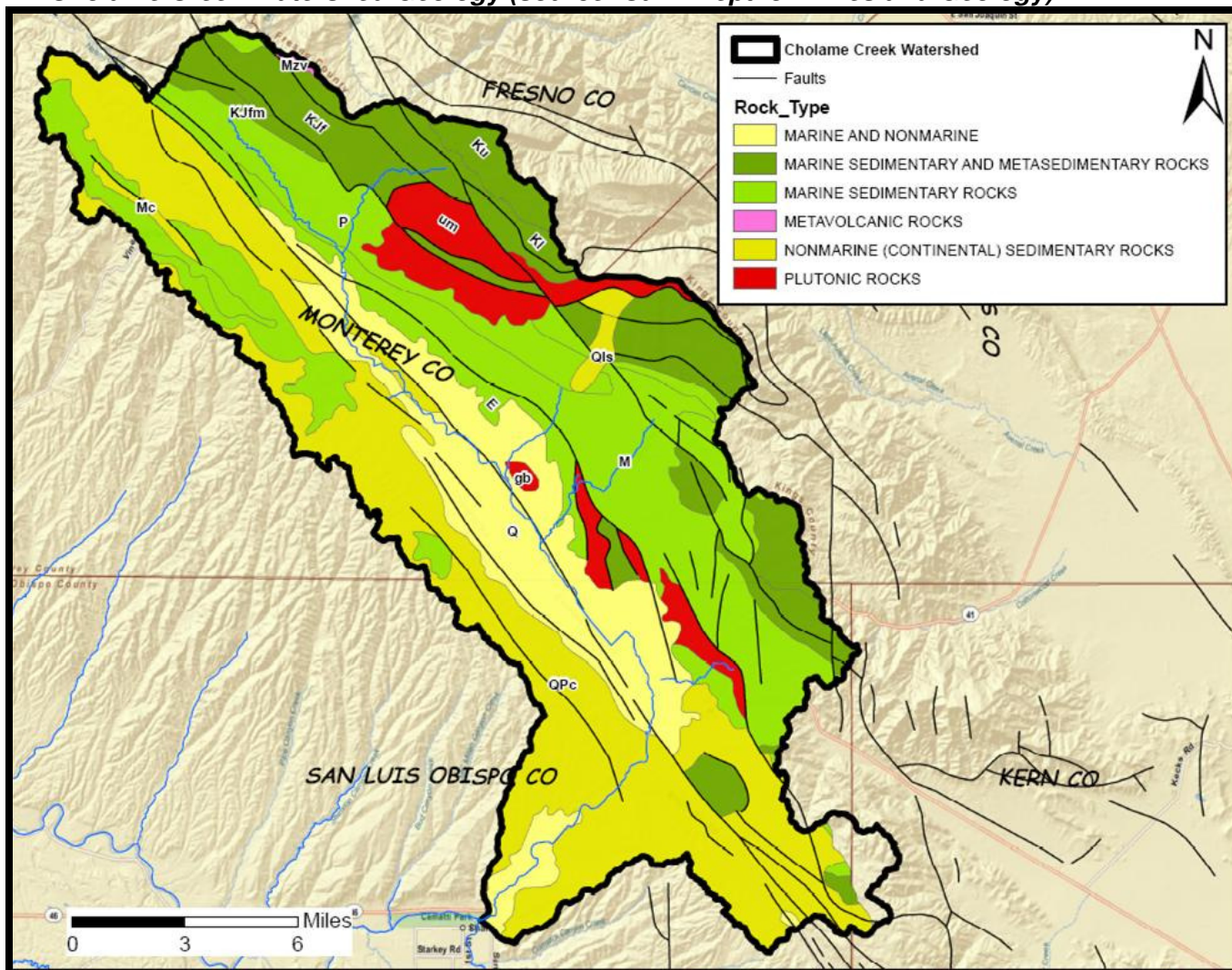
Estimated Mean Annual Precipitation, 1970-2000. (source:PRISM dataset)



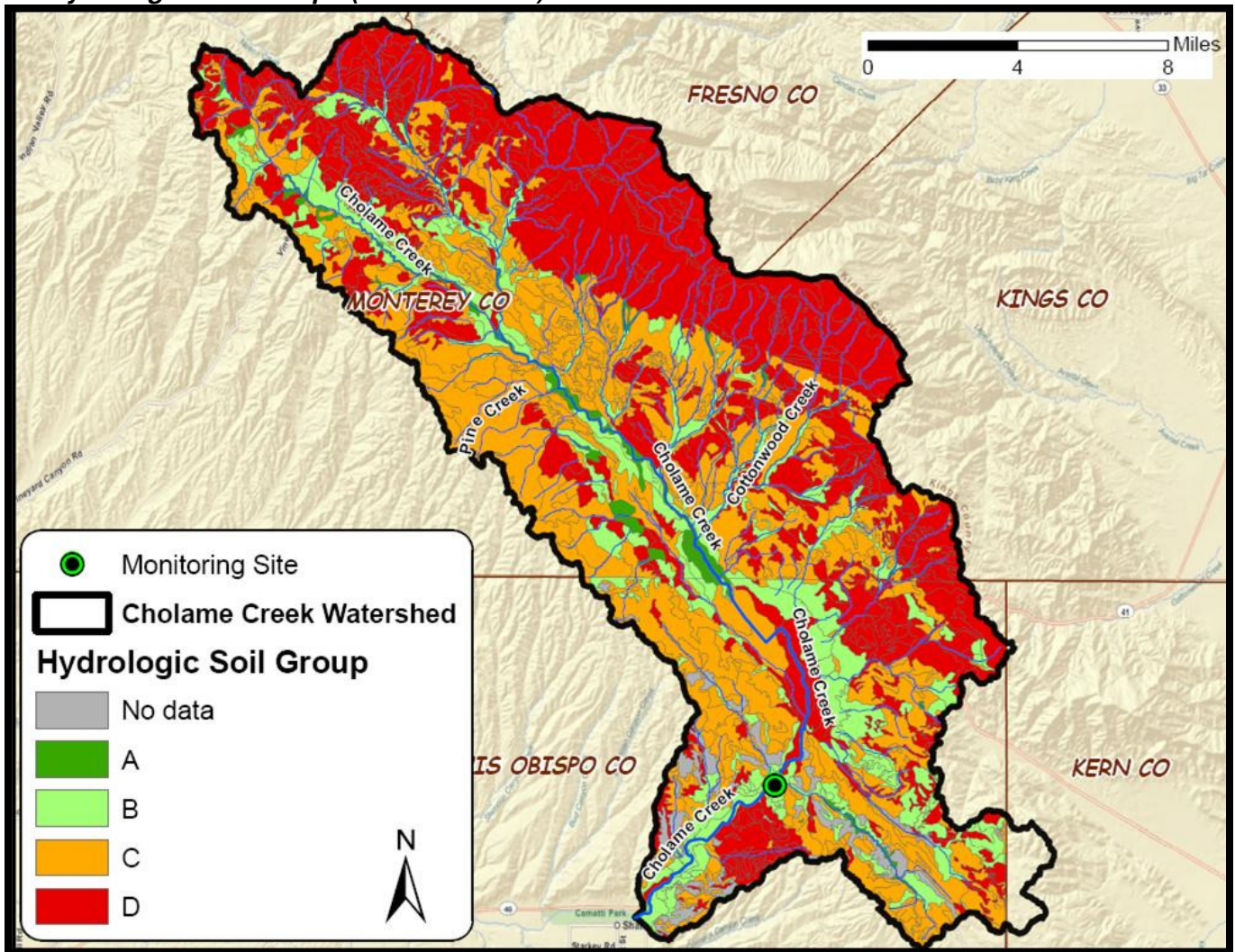
Precipitation Frequency: NOAA 2-year, 6-hour precipitation frequency map.



Cholame Creek Watershed Geology (source: Calif. Dept. of Mines and Geology).

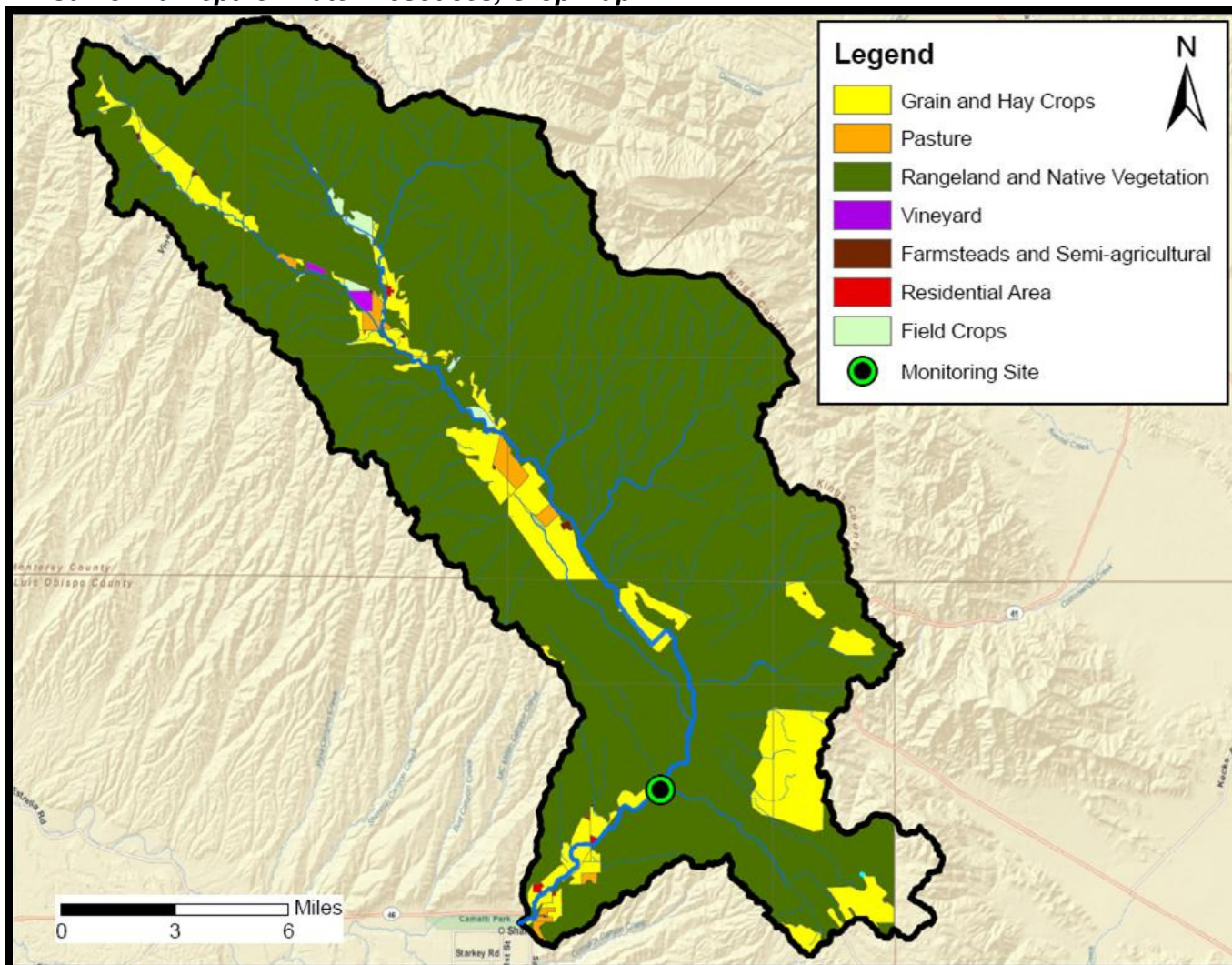


Hydrologic Soil Groups (source: NRCS)



| Hydrologic Soil Group Descriptions: | |
|-------------------------------------|---|
| A | Well-drained sand and gravel; high permeability |
| B | Moderate to well-drained; fine to moderately coarse texture; moderate permeability |
| C | Poor to moderately well-drained; moderately fine to fine texture; slow permeability |
| D | Poorly drained; clay soils, or shallow soils over nearly impervious layers(s) |

California Dept. of Water Resources, Crop Map.



APPENDIX E: FECAL COLIFORM PRODUCER INVENTORY DATA

The data and calculations for estimated domestic animal and wildlife populations in the TMDL project area are presented in this Appendix.

Livestock numbers are derived from the U.S. Department of Agriculture's (USDA) National Agricultural Statistics Service (NASS) census database. NASS provides census inventories of livestock and farm animals on a countywide basis. At the time this project report was written, the most recent version of the NASS Agricultural Census available online was for 2007

Staff used estimation methods for livestock numbers in the project area as recommended in USEPA pathogen TMDL guidance (USEPA, 2001). This method is commonly used in pathogen TMDL development (for example, Mississippi Dept. of Environmental Quality, 2000; Oklahoma Dept. of Environmental Quality, 2006; Montana Dept. of Environmental Quality, 2009). The method is also used by academic researchers involved in water quality studies (for example, Gibson, 2005). The method involves deriving estimated average stocking density (livestock/acre) using county-level livestock numbers available from NASS in conjunction with land use data. In accordance with the USEPA-recognized methodology, staff assumes that livestock are evenly distributed throughout all rangeland and/or pasture in the county. To obtain an average animal stocking density, the number of livestock in Monterey County were obtained from the USDA Agricultural Census database, and divided by the amount of rangeland and/or pasture in Monterey County (source: FMMP land use data, 2008). This yielded an average county-level animal stocking density per acre. This average stocking density/acre value was then multiplied by the acreage of rangeland and pasture within the Cholame Creek watershed project area to obtain the livestock numbers shown in Table 4-1.

The number of people and the number of households in the watershed is estimated from census block data in the U.S. Census Bureau 2000 decennial census. Note that census blocks boundaries don't necessarily coincide with watershed boundaries; as such staff digitally clipped electronic shapefiles of the census blocks which are located completely within the boundaries of the The Cholame Creek watershed, and then extracted population attribute information from the digitally clipped census blocks.

Census data for onsite disposal systems (OSDS – also known as septic tanks) was obtained from block group data in the 1990 Decennial Census. Unfortunately, household sewage disposal information was not included in the 2000 Census. However, given the low density of housing and small population of people in the Chalome Creek watershed, staff reasons that the 1990 OSDS census data is a plausible estimate of the current density (number per unit area) of OSDS in the project area.

Most communities do not have data on the number of households that own dogs, cats, or horses. Therefore the numbers of dogs and cats in the project area were estimated from the American Veterinary Medical Association's U.S. Pet Ownership and Demographics Sourcebook (AMVA, 2007), in conjunction with housing data from the U.S. Census Bureau. Staff used household-to-pet ratios reported by AMVA to estimate the number of pets in the project area. For example, AMVA (2007) reports that 37.2% of households own dogs. The average number of dogs owned by these households is 1.7. Therefore, the number of dogs can be estimated by

the following calculation: number of dogs = (total number of households in area of interest) x 0.372 (i.e., the ratio of households that own dogs) x 1.7.

Horse ownership statistics have also been reported by AMVA (2007); however AMVA provides national statistical averages for horse ownership. Staff recognizes that the AMVA national-average reporting may bias the estimates of horse ownership towards urban demographics. The Cholame Creek watershed however, is entirely rural and staff recognizes that rural household ownership of horses is generally much higher than urban household horse ownership. Consequently, staff estimates the horse population in the Cholame Creek watershed based on horse ownership rural demographics reported by the American Horse Council Federation (2005), in conjunction with U.S. Census Bureau housing data.

Wildlife populations are estimated from animal population densities available from the California Department of Fish and Game (CDFG), from other agencies or from credible peer-reviewed scientific sources shown in Table 4-1. Additionally, Water Board staff interviewed CDFG staff for information, and used published CDFG reporting. For the majority of wildlife species inventoried in the project report, staff used population density estimates that were based on Monterey County-specific, central coast region-specific, or California-specific reporting. Using these numbers, habitat densities (animals/unit area) were derived, and it was assumed that the distribution of animals was spread uniformly across all suitable habitat. To obtain wildlife populations, staff multiplied the animal population density estimates by the acreage of suitable habitat obtained from digital land cover data. The habitat ranges, habitat requirements, and seasonality of wildlife species shown in Table 4-1 were corroborated with digital databases and literature available from the CDFG Wildlife Habitat Relation System, found online at: www.dfg.ca.gov/biogeodata/cwhr/.

Domestic Animals: Livestock and Farm Animals

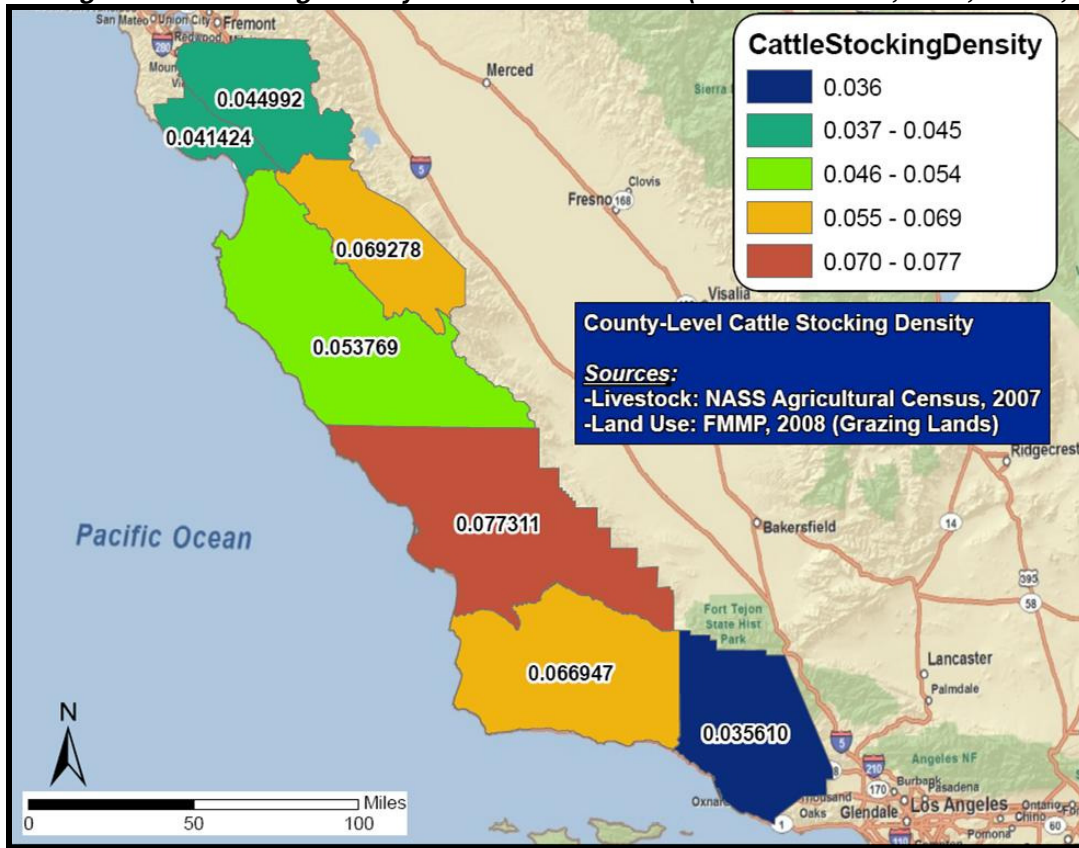
Project area estimates for numbers of domestic animals.

| Livestock | Land Use | Density per Acre | Acres in Watershed | Total Livestock |
|-------------------|---|--------------------|--------------------|-----------------|
| Cattle | Grass Land (NLCD, 2001) | 0.050 ^A | 95079 | 4754 |
| Sheep | Pasture, Rural Residential, Cropland (NLCD, 2001) | 0.0284 | 3739 | 106 |
| Hogs | Pasture, Rural Residential, Cropland (NLCD, 2001) | 0.0029 | 3739 | 11 |
| Goats | Pasture, Rural Residential, Cropland (NLCD, 2001) | 0.0173 | 3739 | 65 |
| Chicken (broiler) | Pasture, Rural Residential, Cropland (NLCD, 2001) | 0.0007 | 3739 | 3 |
| Chicken (layer) | Pasture, Rural Residential, Cropland (NLCD, 2001) | 0.0583 | 3739 | 218 |

A: Cattle stocking density based on Monterey County NASS livestock data (see Figure below).

- Source of average stocking densities: Number of animals in County from National Agricultural Statistics Service (2007)
- Source of Land Use data: Grassland, Cropland, Pasture and Residential (National Land Cover Dataset, 2001).

Average Cattle Stocking Density Estimates – AU/acre (Sources: NASS, 2007; FMMP, 2008)



| | Average Rural Household Horse Ownership / California | Households in Watershed | Total Horses |
|--------|--|-------------------------|--------------|
| Horses | 0.48 (see horse estimate methodology below)* | 138 | 66 |

***ESTIMATED AVERAGE NUMBER OF HORSES OWNED BY RURAL HOUSEHOLDS IN CALIFORNIA:**

- 57% of all horses are located in rural areas or small communities (source: American Horse Council Federation, 2005 as reported at: http://www.horseproperties.net/horse_statistics.html)
- There are 700,000 horses estimated in the state of California (source, American Horse Council Federation June 29, 2005)
- Therefore, of California's 700,000 horses, 399,000 horses (i.e., 57% of total California horses) are located in rural areas.
- There are 826,662 housing units in rural areas of California. (source, Census 2000 Decennial Census at: http://factfinder.census.gov/servlet/DatasetMainPageServlet?_program=DEC&_submenuId=datasets_1&lang=en)
- Therefore, the average number of horses owned by California rural households is::

$(399,000 \text{ horses}) / (826,662 \text{ rural households}) = \mathbf{0.48 \text{ horses per rural household.}}$

Domestic Animals: Pets

Project area estimates for numbers of pets.

| | Percent of households owning | Total households in TMDL project area | Project area households Owning cats or dogs | Average number owned per household | Total Animals in TMDL Project Area |
|------|------------------------------|---------------------------------------|---|------------------------------------|------------------------------------|
| Dogs | 37.2% | 138 | 51 | 1.7 | 87 |
| Cats | 32.4% | 138 | 45 | 2.2 | 98 |

-Source: American Veterinary Medical Association's U.S. Pet Ownership and Demographics Sourcebook (AMVA, 2007), and housing data from U.S. Census Bureau, 2000 Decennial Census.

Wildlife

Project area land cover distribution for calculating wildlife populations (source FFMP, 2008).

| Land Use/Land Cover | Acres |
|-----------------------|---------------|
| Residential | 100 |
| Grazing Land | 128276 |
| Farmland | 12704 |
| Forest or Undeveloped | 10607 |
| Total | 151687 |

Estimated wildlife population densities and habitat requirements.

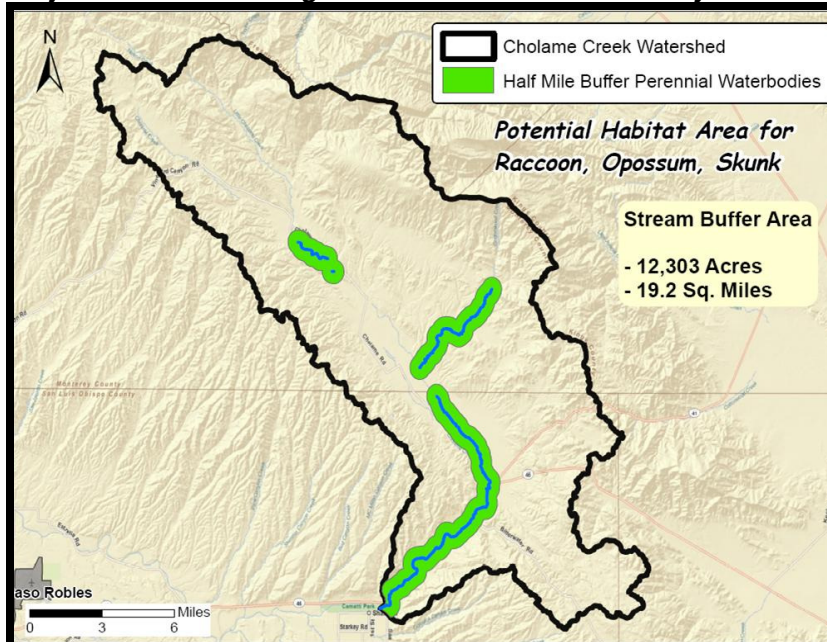
| Wildlife Type | Reported Population Density Range (animals/mi ²) | Average Density (animals/mi ²) | Estimated Population Density (#/per acre) | Land Cover Distribution | Habitat Notes |
|------------------------|--|--|---|---|--|
| Deer ^A | 4.4 to 7.8 | 6.1 | 0.01 | Forest, Grazing Land, Farm Land | Prime habitat: Entire watershed |
| Feral pig ^B | 1.3 to 2.1 | 1.7 | 0.003 | Forest, Grazing Land, Farm Land | Prime habitat: Entire watershed |
| Coyote ^C | 0.75 to 0.91 | 0.83 | 0.001 | Forest, Grazing Land, Farm Land | Prime habitat: Entire watershed |
| Raccoon ^D | 6 to 52 | 29 | 0.045 | One-half mile buffer around perennial waterbodies | Prime habitat wetland, riparian, forest. Closely associated with permanent water (e.g., perennial streams). Virginia TMDL program used habitat and population estimate base ^d on 0.5 mile buffer around streams. This buffer range is broadly consistent with home ranges of individual raccoons as reported by CDFG. |
| Opossum ^D | 5.8 to 26.2 | 16 | 0.025 | One-half mile buffer around perennial waterbodies | Prime habitat wetland, riparian, forest. Closely associated with permanent water. (see raccoon) |
| Skunk ^E | 6.2 to 37 | 21.6 | 0.034 | One-half mile buffer around perennial waterbodies | Prime habitat wetland, riparian, forest. Closely associated with permanent water. (see raccoon) |

| Wildlife Type | Reported Population Range (animals/mi ²) | Average Density (animals/mi ²) | Estimated Population Density (#/per acre) | Land Cover Distribution | Habitat Notes |
|-----------------------|--|--|---|---------------------------------|--|
| Turkey ^F | 7 to 9.6 | 8.3 | 0.013 | Forest, Grazing Land | Entire watershed excluding urban and farmland (trees/shrubs required for roosting habitat) |
| Pheasant ^G | - | 23.5 | 0.037 | Forest, Grazing Land, Farm Land | Pheasant populations on the central coast reportedly are limited to scattered and isolated areas. However, staff reasoned that pheasant populations should be included for Project Area wildlife estimates...see footnote at end of Appendix. |
| Duck ^H | - | 5.5 | 0.009 | Farm Land, Grazing Land, Urban | Cropland, Pasture, Wetland, Urban. Upland forest and shrubland not prime habitat; consequently did not include in grazing lands. Used statewide duck population estimate to interpret gross average watershed population density. Ducks also "much more numerous" in winter, according to DFG. |

Population Density and Habitat Sources

- A: California Dept. of Fish and Game - <http://www.dfg.ca.gov/wildlife/hunting/deer/docs/habitatassessment/part4.pdf>
- B: California Dept. of Fish and Game - Game <http://www.dfg.ca.gov/biogeodata/cw/hr/cawildlife.aspx>
- C Babb and Kennedy, 1989. *An Estimate of Minimum Density for Coyotes in Western Tennessee*. Journal of Wildlife Management Vol. 53 (1): pp 186-188.
- D:: Kissel and Kennedy, 1992. *Ecological Relationships of Co-occurring Populations of Opossums and Raccoons*. Journal of Mammalogy, vol. 73, pp. 808-813.
- E. Ontario Ministry of Natural Resources. Wildlife Research Service, 1987. *Wildfurbearer Management and Conservation in North America*, Chapter 45, Striped, Spotted, Hooded and Hog-Nosed Skunk.
- F.: California Dept. of Fish and Game - http://www.dfg.ca.gov/wildlife/hunting/uplandgame/docs/turkplan_04.pdf
- G: Interpreted from Cal. DWR Interagency Ecological Program - http://www.iep.ca.gov/suisun_eco_workgroup/workplan/report/wildlife/pheasant.html
- H. California Dept. of Fish and Game, 2008 Waterfowl Breeding Population Survey. <http://www.dfg.ca.gov/news/news08/08045.html>
Geese population interpreted from. California Dept. of Fish and Game, Waterfowl Hunt Comparison Report. http://www.dfg.ca.gov/wildlife/waterfowl/shoot/ComparisonTables/docs/HT_CMP07.pdf

Project area habitat range for mammals that are closely associated with permanent waterbodies.



The table below presents the estimated project area population of wildlife based on the habitat and population density outlined above.

Estimated Populations of Wildlife in TMDL Project Area.

| Wildlife Type | Estimated Population Density (#/per acre) | Habitat: Land Cover Distribution | Acres of Habitat in Project Area | Estimated Project Area Population |
|----------------------|--|---|---|--|
| Deer | 0.01 | Forest, Grazing Land, Farm Land | 151587 | 1516 |
| Feral pig | 0.003 | Forest, Grazing Land, Farm Land | 151587 | 455 ^A |
| Coyote | 0.001 | Forest, Grazing Land, Farm Land | 151587 | 152 |
| Raccoon | 0.045 | One-half mile buffer around perennial waterbodies | 12303 | 554 |
| Opossum | 0.025 | One-half mile buffer around perennial waterbodies | 12303 | 308 |
| Skunk | 0.034 | One-half mile buffer around perennial waterbodies | 12303 | 418 |
| Turkey | 0.013 | Forest, Grazing Land | 138883 | 1805 |
| Duck | 0.009 | Farm land, Urban, Forest | 12804 | 115 |

^A Based on input from local stakeholders, the feral pig population estimate was doubled (Calif. Dept. of Fish and Game Monterey County feral pig population density estimate X 2)

APPENDIX E: BACTERIA SOURCE LOAD CALCULATOR (BSLC) SPREADSHEETS

Animal Inventory from BSLC Spreadsheets

Please Enter the Numbers of the Following Animals for Each Subwatershed:

| Subwatershed | Cattle | | | Chickens | | | Turkeys | | | Horses | Ewes | Goats |
|---------------|--------|------|--|----------|----------|------------------|---------|------|----------|--------|------|-------|
| | Dairy | Beef | | Layers | Broilers | Broiler Breeders | Toms | Hens | Breeders | | | |
| Cholame Creek | | | | 4754 | 218 | 3 | | | | 66 | 106 | 65 |

| Subwatershed | Deer | Raccoons | Muskrats | Beavers | Geese | | | Ducks | | | Wild Turkeys | |
|---------------|------|----------|----------|---------|-------|----------|----------|-------|----------|----------|--------------|------|
| | | | | | Peak | Season 2 | Season 3 | Peak | Season 2 | Season 3 | | |
| Cholame Creek | 3032 | 862 | 418 | | | | | | 115 | | | 3610 |

Additional Animal Species Inventory from BSLC Spreadsheets

| | A | S | T | U | V | W | X | Y | Z | AA | AB | AC |
|---|--------------------------|---|---|---|---|---|---|---|---|----|----|----|
| 1 | Number Special Wildlife: | Return to Animals Sheet | | | | | | | | | | |
| 2 | Feral Pig | | | | | | | | | | | |
| 3 | Cholame Creek | 910 | | | | | | | | | | |
| 4 | | | | | | | | | | | | |
| 5 | Coyote | | | | | | | | | | | |
| 6 | Cholame Creek | 152 | | | | | | | | | | |
| 7 | | | | | | | | | | | | |

Land Use Data for BSLC Spreadsheets

Please Enter the Following Information About the Land Uses in Each Subwatershed:

| Subwatershed | Total Forest Acreage | Total Cropland Acreage | Total Pasture Acreage | Loafing Lot Time Dairy | Loafing Lot Time Beef | Pasture 1 Fraction of Total | Pasture 2 Fraction of Total | Pasture 3 Fraction of Total | Stream Access Pasture 1 | Stream Access Pasture 2 | Stream Access Pasture 3 | Straight Pipes |
|--------------|----------------------|------------------------|-----------------------|------------------------|-----------------------|-----------------------------|-----------------------------|-----------------------------|-------------------------|-------------------------|-------------------------|----------------|
| Cholame Cree | 10607 | 12704 | 128276 | | | 1 | | | 0.2 | | | 0 |

References for BSLC Spreadsheets

G3 Use Tularcitos Creek Values for Entire Watershed Done

These values are used in the loading calculations. You can change the results of the calculations by changing the values for these variables, or keep the defaults.

| Parameter | Tularcitos Creek | Units | Source |
|---|------------------|----------------------|---|
| Beef Cow Parameters | | | |
| Average weight of beef cow | 1000 | lb | |
| Fecal coliform production by 1000-lb beef cow | 3.30E+10 | total cfu/day-animal | within range of values from literature (Mountain Run TMDL, ASAE Standards, Geldreich) |
| Ratio of beef cattle on: | | | Assumed to be 4.2:1 based on information gathered from beef extension specialists at Virginia Tech. |
| Pasture 1 | 4 | ratio | |
| to Pasture 2 | 2 | ratio | |
| to Pasture 3 | 1 | ratio | |
| Manure excreted by beef cow | 60 | lb/day-animal | Livestock Waste Facilities Handbook, MWPS - 18 |
| Fraction of cows defecating in stream as compared to the cows that are in/around streams (beef) | 0.3 | ratio | assumed |
| Sheep and Goat Parameters | | | |
| Ewe Weight | 60 | lbs | ASAE 1998 Standards: D384.1 DEC93 |
| Lamb Weight | 30 | lbs | BPJ - 1/2 weight of ewes |
| Goat Weight | 140 | lbs | ASAE 1998 Standards: D384.1 DEC93 |
| How many lambs should be associated with each ewe? | 2 | lambs/ewe | BPJ |
| Ratio of sheep and goats on: | | | |
| Pasture 1 | 3 | ratio | |
| to Pasture 2 | 2 | ratio | |
| to Pasture 3 | 0 | ratio | |
| Fraction of sheep defecating in stream as compared to the sheep that are in/around streams | 0 | ratio | |
| Fecal coliform production by 60-lb sheep | 1.20E+10 | total cfu/day-animal | ASAE 1998 Standards: D384.1 DEC93 |
| Horse Parameter | | | |
| Fecal coliform production by 1000-lb horse | 4.20E+08 | total cfu/day-animal | |
| Ratio of horses on: | | | Assume all are on pasture 1 right now |
| Pasture 1 | 1 | ratio | |
| to Pasture 2 | 0 | ratio | |
| to Pasture 3 | 0 | ratio | |
| Fraction of horses defecating in stream as compared to the horses that are in/around streams | 0 | ratio | |
| Poultry Parameters | | | |
| Length of layer cycle (including down time) | 336 | days | |
| Length of broiler cycle (including down time) | 56 | days | |
| Length of turkey cycle (including down time) | 70 | days | |
| Manure production by layers | 0.256 | lb/day-bird | ASAE D384.1 DEC93 |
| Manure production by broilers | 0.168 | lb/day-bird | ASAE D384.1 DEC93 |
| Manure production by turkeys | 0.705 | lb/day-bird | ASAE D384.1 DEC93 |
| Fecal coliform production by layers | 1.40E+08 | cfu/day-bird | ASAE D384.1 DEC93 |
| Fecal coliform production by broilers | 8.90E+07 | cfu/day-bird | based on relative manure production of layers & broilers |
| Fecal coliform production by turkeys | 9.30E+07 | cfu/day-bird | ASAE D384.1 DEC93 |
| Layer litter produced | 30 | lb/cycle-bird | Va. Nutrient Management Handbook |
| Broiler litter produced | 2.6 | lb/cycle-bird | Va. Nutrient Management Handbook |
| Turkey litter produced | 18 | lb/cycle-bird | Va. Nutrient Management Handbook |
| Occupancy Factor for layers | 0.958 | ratio | |
| Occupancy Factor for broilers | 0.787 | ratio | |
| Occupancy Factor for turkeys | 0.865 | ratio | |
| Die-off coefficient for poultry litter | 0.035 | 1/day | Kimberly Panhorst's research |
| Wildlife Parameters | | | |
| Deer fecal coliform produced | 3.50E+08 | total cfu/day-animal | Yagow (2001) FC and Harlow (1983) forage |
| Fraction of deer defecating in stream | 0.01 | ratio | |
| Raccoon fecal coliform produced | 5.00E+07 | total cfu/day-animal | |
| Fraction of raccoons defecating in stream | 0.1 | ratio | |
| Muskrat fecal coliform produced | 2.50E+07 | total cfu/day-animal | Mountain Run TMDL (Yagow, 2001) |
| Fraction of muskrats defecating in stream | 0.25 | ratio | |
| Goose fecal coliform produced | 8.00E+08 | total cfu/day-animal | Moyer and Hyer, 2003 |
| Fraction of geese defecating in stream | 0.25 | ratio | |
| First Month of Goose Peak Season (mm format, e.g., Dec=12) | 9 | month number | |
| Last Month of Goose Peak Season (mm format, e.g., Dec=12) | 2 | month number | |
| Duck fecal coliform produced | 2.40E+09 | total cfu/day-animal | ASAE 1998 Standards: D384.1 DEC93 |
| Fraction of ducks defecating in stream | 0.25 | ratio | |
| First Month of Duck Peak Season (mm format (e.g., Dec = 12)) | 9 | month number | |
| Last Month of Duck Peak Season (mm format (e.g., Dec = 12)) | 2 | month number | |
| Wild Turkey fecal coliform produced | 9.30E+07 | total cfu/day-animal | |
| Fraction of wild turkeys defecating in stream | 0.01 | ratio | |
| Beaver fecal coliform produced | 2.00E+05 | total cfu/day-animal | MapTech, 2000 |
| Fraction of beavers defecating in stream | 0.5 | ratio | |

APPENDIX F: BEDLOADS - BACTERIA LOAD ESTIMATOR SPREADSHEETS (BLEST)

Loads associated with resuspension of sediment (bedloads) can be estimated using the Bacteria Load Estimation Spreadsheet (BLEST) tool, developed by the Texas Commission on Environmental Quality. By multiplying the occurrence of resuspension flows, sediment scour rates, and estimates of stream width and stream lengths, the fecal coliform bedloads can be calculated. Because loading is a function of stream width and length, the streams with the largest stream surface area exposed to bed sediment will consequently have the largest bed sediment contribution.

The methodology used in BLEST to estimate bedloads is outlined below:

1. Estimate Average Stream Width (from observations, photos).
2. Estimate Stream Length (from monitoring point, to upstream extent of sediment fines source area).
3. Estimate indicator bacteria resuspension from cohesive sediments (Jamieson et al., 2005). In these calculations, the average resuspension rate for bacteria ($11,000 \text{ CFU m}^{-2} \text{ s}^{-1}$) from Jamieson et al. was used.
4. Estimate length of time stream experiences critical shear conditions (used default from BLEST spreadsheet, 0.4 hours, using data from NOAA).
5. Assume shear is occurring along the entire stream reach.

BLEST does not use a fecal coliform resuspension rate in the load calculation. BLEST uses an *E.coli* resuspension rate taken from Jamieson et al. (2005). However, *E. coli* concentrations typically track relatively well with fecal coliform concentrations in the water column, and it is assumed here that using the Jamieson et al. *E. coli* resuspension rates is a reasonably good surrogate for potential fecal coliform resuspension rates.

The figure below presents the BLEST spreadsheet calculations.

1 Cholame Creek Estimated Bedload

2

3 **Methodology**

4 1. Estimate Average Stream Width (from observations, photos)

5 2. Estimate Stream Length (from monitoring point, to upstream extent of sediment fines source area)

6 3. Estimate indicator bacteria resuspension from cohesive sediments (Jamieson et al., 2005)

7 4. Estimate length of time stream experiences critical shear conditions (used default from BLEST spreadsheet, 0.4 hours, using data from NOAA)

8 5. Assume shear is occurring along the entire stream reach.

9

10 **Input Data**

11 Stream Width (ft)

12 Cholame Creek 10

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14 Number of Rain Days (>0.5 inches precip) 6 source: CIMIS Station 113 - King City

15 Typical Storm Length 8

16 Portion of storm experience shear > Tc = 5% default value

17 Resuspension Rate (cfu/m²/s) 11000 (See Table 3 to right)

18 cfu/m²/hr 3.96E+07

19 cfu/ft²/hr 3.68E+06

20

21 Resuspension rate per storm (cfu/ft²) 1.47E+07

22

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24

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28 **BLEST Calculations:**

29

30 From Jamieson et al., 2005

31 **LOAD CALCULATION:**

| Subbasin # | Stream | Stream Width (ft) | Stream Length (ft) | Majority Concrete Lined? | MPN/yr | End of MPN/wet day | End of 1013 | Begin 1014 | End of Res | 1017 |
|------------|--------|-------------------|--------------------|--------------------------|--------|--------------------|-------------|------------|------------|----------|
| 32 33 | 1 | Whiteoak Bayou | 10 | 299364 | N | 2.64E+13 | 4.41E+12 | | | 4.41E+12 |

37

38 **Load Calculation**

| Stream | Stream Width (ft) | Stream Length (ft) | MPH/storm event | MPH/year |
|------------------|-------------------|--------------------|-----------------|----------|
| 39 Cholame Creek | 10 | 299364 | 4.41E+12 | 2.64E+13 |

40

41 Wet day = Day with Precip > 0.5 inches from CIMIS #113 King City Weather Station (ave. 6 Wet days per year at King C

44 **Stream Length Calculation**

45

46 Total Length of NHDplus Stream Reaches = 378 miles

47 Ratio of Watershed comprised of > 40% clay soils = 0.15

48 Length of Streams Subject to Bed loading = 378 miles X 0.15 = 57 miles = 299,364 feet of stream reach receiving bed load

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50 Cholame_ClayPercent ArcMap - ArcView

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Table 3. Summary of resuspension parameters computed for the three Swan Creek storm events.

| Storm | Critical bed shear stress | Critical flow | Resuspension rate |
|-------|---------------------------|--------------------------------|--------------------------------------|
| h | N m ⁻² | m ³ s ⁻¹ | CFU† m ⁻² s ⁻¹ |
| 225 | 1.7 | 0.37 | 11 000 |
| 550 | 1.6 | 0.33 | 8 200 |
| 600 | 1.5 | 0.3 | 15 000 |

† Colony forming units.

From Jamieson et al., 2005

APPENDIX G: LOAD DURATION CURVES

Load duration curves provide a graphical context for looking at monitoring data and can also potentially be used to focus and inform implementation decisions (Stiles and Cleland, 2003). A load duration curve is the allowable loading capacity of a pollutant, as a function of flow. The flow duration curve is transformed into a load duration curve by multiplying the flow by the water quality objective and a conversion factor. The water quality objective that staff selected to calculate the load duration curve was the instantaneous fecal coliform Basin Plan criterion 400 MPN/100 mL. The load duration curve is thus calculated by multiplying the flow at the given flow exceedance percentile, by the instantaneous fecal coliform criteria and unit conversion factors; therefore the loading capacity is:

$$\text{Loading Capacity (MPN/day)} = \text{Water Quality Criterion} \times \text{Flow} \times \text{Unit Conversion Factors}$$

$$\text{Loading Capacity (MPN/day)} = 400 \text{ MPN/100mL} * Q \text{ (cfs)} * 283.2 \text{ 100mL/ft}^3 * 86400 \text{ sec/day}$$

The load duration method essentially uses an entire stream flow record to provide insight into the flow conditions under which exceedances of the water quality objective occur. Exceedances that occur under low flow conditions are generally attributed to loads delivered directly to the stream such as straight pipes, domestic animals or wildlife with access to the stream, or some other form of direct discharge. Exceedances that occur under high flow conditions are typically attributed to loads that are delivered to the stream in stormwater runoff. Exceedances occurring under during normal flows can be attributed to a combination of runoff and direct deposits. As such, the load duration curve may illustrate how flow conditions relate to a variety of pollutant sources, and therefore load duration curves can be useful in differentiating between loading from point and nonpoint sources, as shown in the table below.

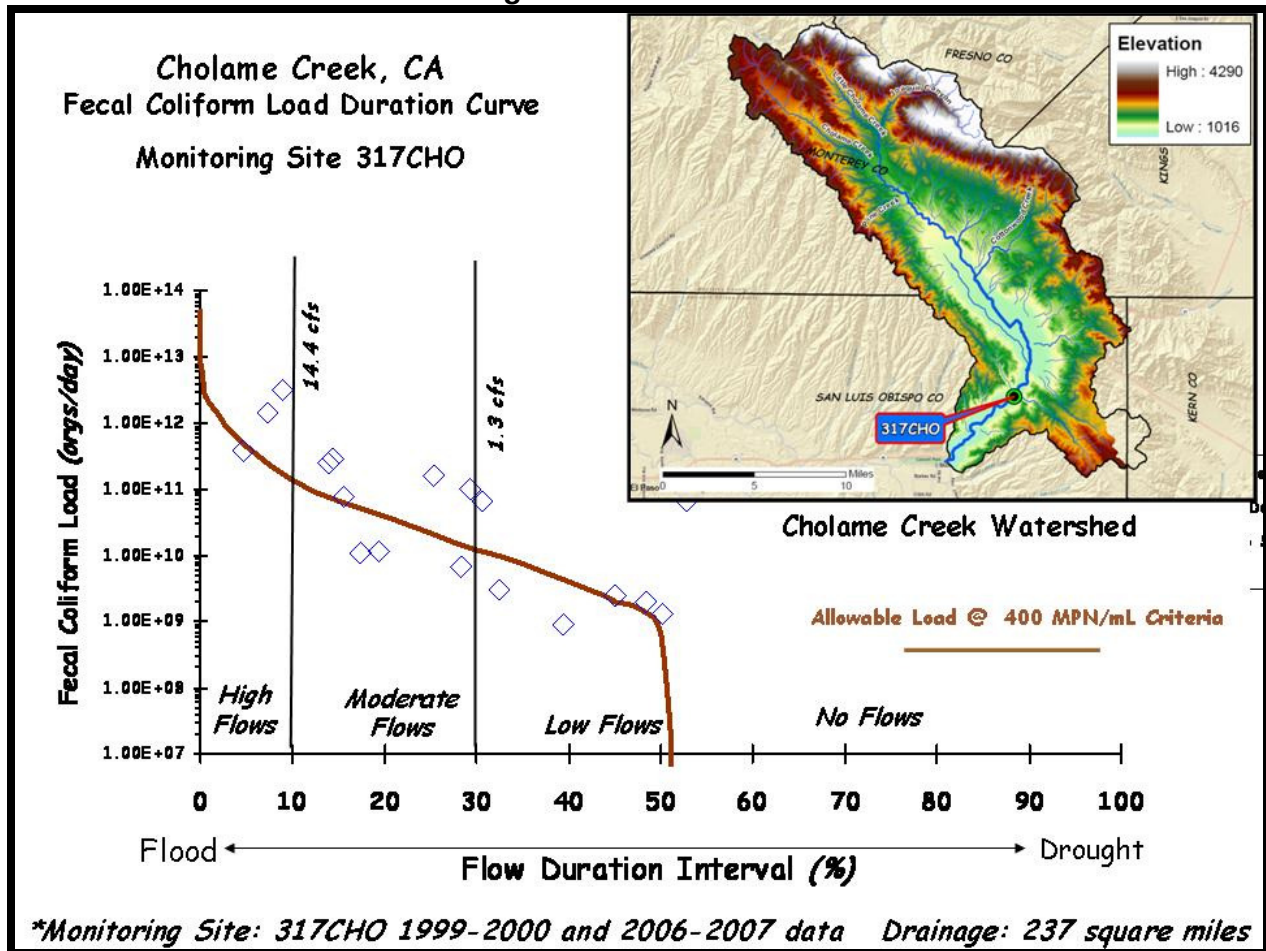
Potential Relationship Between Load Duration Curve and Contributing Sources

| Contributing Source | Flow Regime-Load Duration Curve | | |
|--|---------------------------------|---------------|----------|
| | High Flow | Moderate Flow | Low Flow |
| Direct Point Sources (pipe discharge, etc) | | | H |
| Direct Delivery (livestock in-stream, wildlife, pets, illegal dumping) | | M | H |
| Failing OSDS | | M | H |
| Sediment Resuspension | H | M | |
| Stormwater: Impervious areas | H | H | |
| Combined sewer overflows | H | H | |
| Overland flow/Bank erosion | H | M | |

-Note: Color Shading = Potential relative importance of source area to contribute loads under given hydrologic condition (H=High; M=Medium)
 -Table adapted from USEPA, Bruce Cleland, and Oregon Dept. of Environmental Quality.

A load duration curve (shown below) for Cholame Creek at 317CHO was constructed using estimated daily flow records and a spreadsheet tool developed by Bruce Cleland, USEPA (Cleland, 2002).

Load duration curve for monitoring site 317CHO



The load duration curve for Cholame Creek presented above indicates that excursions above the water quality objective are relatively routine across all flow regimes.

Load duration analysis included a “percent reduction” that was calculated for informational purposes only, to illustrate the difference between existing conditions and the loading capacity at the time the streams were sampled. In accordance with USEPA guidance (USEPA, 2007), existing loading is conservatively calculated as the 90th percentile of measured fecal coliform concentrations under each hydrologic flow regime class multiplied by the flow at the middle of the flow exceedance percentile. For example, the middle percentile (20%) of the moderate flow regime was used, to assess existing loads at moderate flow (10-30th percentile flow class). Low flows were handled differently. In Cholame Creek flow is not observed 100% of the time. Therefore, the existing loading at low flow conditions is multiplied by the flow at the 40th percentile flow.

A TMDL provides a foundation for identifying, planning, and implementing water quality-based controls to reduce both point and nonpoint source pollution. Though the data used to calculate the percent reductions may be considered “historical”, it provides a representation of the existing FIB loads in the waterbodies over a range of hydrologic conditions. Therefore, the percent reduction *should not be viewed as the TMDL* but rather a goal to work towards in the implementation phase of the TMDL process with the ultimate goal being the restoration and maintenance of in-stream water quality so that beneficial uses are met. The percent reductions are presented in the table below and can be calculated as:

Percent reduction = [(existing load) - (allowable load)/(existing load)] *100

Estimated Existing Fecal Coliform Loading for 317CHO with Critical Condition Highlighted

| Flow Regime | Loading Capacity | Estimated Existing Load (90 th percentile) | Percent Reduction Goal |
|----------------|------------------|--|------------------------|
| High Flows | 4.49 E+11 | 2.85 E+12 | 84% |
| Moderate Flows | 3.83 E+10 | 2.64 E+11 | 85% |
| Low Flows | 6.66 E+10 | 3.99 E+09 | 94% |

Exceedences of the water quality objective occurs over all flow regimes; however, the highest percent exceedences of the water quality objective appears to occur in the low flow regime. Fecal coliform exceedences in the dry season - when the assimilative capacity of the water body is reduced by low flow conditions - are generally attributable to either point source discharges, or to direct defecation in/around the creek channel by wildlife or domestic animals. Also bacteria wash-off from the land surface by overland flow during moderate flow conditions may be a contributor to fecal coliform loading. The lack of water quality data during high flow regimes apparently precludes evaluating potential loading associated with nonpoint sources during large precipitation events.

The load duration calculations, using Bruce Cleland's (2002) spreadsheet tool, are presented below.

| Microsoft Excel - !WQ Tool(Template)_317CHO | | | | | | | | | | |
|---|------------------------------|-----------|-------------|---|---|--------------------|------------|------------|------------|--|
| File Edit View Insert Format Tools Data Window Help | | | | | | | | | | |
| M6 | | | | | | | | | | |
| A | B | C | D | E | F | G | H | I | J | |
| 1 | LOAD DURATION SUMMARY | | | Station ID : 317CHO | | | | | | |
| 2 | <i>Peak to Low</i> | | | Station name : Cholame Creek at Bitterwater Road | | | | | | |
| 3 | <i>cfs</i> | <i>mm</i> | <i>Load</i> | 237.0 = Drainage Area (square miles) | | | | | | |
| 4 | 0.004% | 4998 | 19.921 | 4.89E+13 | High | Moist | Mid | Dry | Low | |
| 5 | 0.01% | 2905 | 11.578 | 2.84E+13 | 46 | 2 | 0.1 | 0.0 | 0.0 | |
| 6 | 0.10% | 532 | 2.119 | 5.20E+12 | 0.183 | 0.009 | 0.000 | 0.000 | 0.000 | |
| 7 | 1% | 207 | 0.827 | 2.03E+12 | 4.49E+11 | 2.16E+10 | 6.66E+08 | 0.00E+00 | 0.00E+00 | |
| 8 | 5% | 46 | 0.183 | 4.49E+11 | | | | | | |
| 9 | 10% | 14 | 0.058 | 1.41E+11 | | | | | | |
| 10 | 15% | 7 | 0.027 | 6.66E+10 | 400 | WQ Criteria | | | | |
| 11 | 20% | 4 | 0.016 | 3.83E+10 | | | | | | |
| 12 | 25% | 2 | 0.009 | 2.16E+10 | Key Loading Equations | | | | | |
| 13 | 30% | 1 | 0.005 | 1.25E+10 | <i>Load (lb/day) = Criteria * Flow * (5 3945)</i> | | | | | |
| 14 | 35% | 1 | 0.003 | 7.49E+09 | <i>TSS Load (tons/day)</i> | | | | | |
| 15 | 40% | 0 | 0.002 | 3.99E+09 | <i>= Criteria * Flow * (5 3945/2000)</i> | | | | | |
| 16 | 45% | 0 | 0.001 | 2.00E+09 | <i>Bacteria Load (counts/day)</i> | | | | | |
| 17 | 50% | 0 | 0.000 | 6.66E+08 | <i>= Criteria * Flow * ((28317/100)^60^60^24)</i> | | | | | |
| 18 | 55% | 0 | 0.000 | 0.00E+00 | <i>Note : 1 ft^3 = 28,317 mL</i> | | | | | |
| 19 | 60% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 20 | 65% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 21 | 70% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 22 | 75% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 23 | 80% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 24 | 85% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 25 | 90% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 26 | 95% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 27 | 99% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 28 | 100% | 0 | 0.000 | 0.00E+00 | | | | | | |
| 29 | | | | | | | | | | |
| 30 | | | | | | | | | | |
| 31 | | | | | | | | | | |
| 32 | | | | | | | | | | |

APPENDIX H: DAILY LOAD EXPRESSIONS

Staff provides daily load expressions in light of a recent court decision (*Friends of the Earth, Inc. v. EPA, et al.*, No. 05-5015, D.C. Cir. 2006), and USEPA guidance {USEPA 2007(a)}, despite the fact that this is a concentration-based TMDL and a daily or average daily TMDL is not appropriate for this TMDL project. Mass-based daily load expressions are provided to comply with USEPA technical and legal guidance. USEPA continues to recognize the validity of concentration based TMDLs, in accordance with 40 CFR 122.45(f), but recommends supplementing a concentration-based TMDL with a daily load expression

The District of Columbia (D.C.) Circuit Court of Appeals issued a decision in *Friends of the Earth, Inc. v. EPA, et al.*, No. 05-5015 (D.C. Cir. 2006), in which the D.C. Circuit held that two TMDLs for the Anacostia River did not comply with the Clean Water Act because they were not expressed as *daily* loads.

As a result of the decision, USEPA issued a memorandum entitled *Establishing TMDL “Daily” Loads in Light of the Decision by the U.S. Court of Appeals for the D.C. Circuit in Friends of the Earth, Inc. v. EPA et. al., No. 05-5015* (April 25, 2006) and Implications for NPDES Permits in November 2006 that recommends that all TMDLs and associated load allocations (LAs) and wasteload allocations (WLAs) include a daily time increment in conjunction with other temporal expressions (e.g., annual, seasonal) that may be necessary to implement the relevant water quality standards.

The 2007 USEPA draft guidance for establishing Total Maximum Daily Loads includes the following statements:

“If technically appropriate and consistent with the applicable water quality standard, it may also be appropriate for the TMDL and associated load allocations and wasteload allocations to be expressed in terms of differing maximum daily values depending on the season of the year, stream flow (e.g., wet v. dry weather conditions) or other factors. In situations where pollutant loads, water body flows, or other environmental factors are highly dynamic, it may be appropriate for TMDLs and associated allocations to be expressed as functions of controlling factors such as water body flow. For example, a load-duration curve approach to expressing a TMDL and associated allocations might be appropriate, provided it clearly identifies the allowable daily pollutant load for any given day as a function of the flow occurring that day. Using the load-duration curve approach also has the advantage of addressing seasonal variations as required by the statute and the regulations.”

*“For TMDLs that are expressed **as a concentration of a pollutant**, a possible approach would be to use a table and/or graph to **express the TMDL as daily loads for a range of possible daily stream flows**. The in-stream water quality criterion multiplied by daily stream flow and the appropriate conversion factor would translate the applicable criterion into a daily target.”**

* emphasis added

From: USEPA. 2007. Options for Expressing Daily Loads in TMDLs. USEPA Office of Wetlands, Oceans, and Watersheds, Draft Guidance, June 22, 2007.

A daily or average daily TMDL is inappropriate for the proposed allocations and TMDLs due to both (1) the temporal component embedded in the applicable water quality objective for bacteria; and (2) the episodic and highly variable nature of FIB transport and loading in streams make daily fecal coliform loads inappropriate for this TMDL project.

U.S. EPA noted in this guidance document that “for pollutants where the [water quality standard] has a longer than daily duration (e.g., monthly or seasonal average), individual values that are greater than the daily expression do not necessarily constitute an exceedance of the applicable standard.” This is the case with this TMDL project, which is in response to elevated FIB concentrations in project area waterbodies, and a water quality objective that has an embedded monthly temporal component.

Staff, nonetheless, provide the following interpretations of our concentration-based allocations and TMDLs as a daily load expression in MPN/per day in accordance with the draft U.S. EPA guidance. However, we intend to implement the concentration-based TMDLs and allocations.

The mass-based daily load expressions for the Cholame Creek fecal coliform TMDL are presented in the Table below.

Total Maximum Daily Load, Cholame Creek at 317CHO – Daily Load Expressions.

| Impaired Stream Reaches | Flow Regime | Flow Exceedence Percentile | Flow (cfs) | Flow-based Total Maximum Daily Load | WLA | Load Allocation | MOS |
|-------------------------|------------------|----------------------------|------------|-------------------------------------|------|------------------|----------|
| | | | | | None | Nonpoint Sources | |
| Cholame Creek at 317CHO | High | 5% | 45.9 | 4.49 E+11 | - | 4.49 E+11 | Implicit |
| | Moderate | 20% | 3.9 | 3.83 E+10 | - | 3.83 E+10 | Implicit |
| | Low | 40% | 0.4 | 3.99 E+09 | - | 3.99 E+09 | Implicit |
| | Mean Annual Flow | 11.3% | 11.6 | 1.14 E+11 | | 1.14 E+11 | Implicit |

However, we intend to implement the concentration-based TMDLs and allocations, consistent with the aforementioned USEPA guidance {USEPA, 2007(b)}. As such, daily load expressions presented in this Appendix represent an alternative way to express concentration-based allocations, but the mass-based daily load expressions do NOT formally constitute the TMDL or the allocations.

APPENDIX I: COST ESTIMATES AND SOURCES OF FUNDING

While it is possible to identify a discrete range of costs associated with implementing management practices, there is substantial uncertainty in calculating total costs, or costs associated with future measures. This is in part, due to the uncertainty surrounding the number of facilities, ranches, farms, etc. that will require implementation. Also, specific actions or management measure that are described or identified in the project report can only be suggestions or examples of actions that are known to be effective at reducing loading.

Staff provide estimates of total implementation costs below in Table 6-7. These costs are approximations and come with significant uncertainties, since the number of properties that will require implementation is unknown, and also because the Water Board cannot mandate or designate the specific types of on-site actions necessary to reduce indicator bacteria loading, or to meet allocations by the various responsible parties.

Also, staff did not consider or incorporate improved profitability and economic performance metrics that are commonly reported (e.g., U.S. Dept. of Agriculture and South Dakota State Univ., 2008) to be associated with some of the management practices identified here). Additionally, as a substantial number of grazing lands operators are reportedly proactive with regard to land and animal management, some of the identified management practices presumably have been, or will be implemented, with or without a TMDL. As such, economic estimates provided below are strictly based on an out-of-pocket gross expenditure basis; not a net cost-benefit economic basis.

Cost estimates for specific implementation actions shown here were tabulated from sources provided by the National Resources Conservation Service, U.S. Environmental Protection Agency, U.S. Department of Agriculture, and other sources.

Planning or Program Development Actions: The cost to develop FIB control measures at these facilities will vary from site to site depending upon constraints present at each site. Central Coast Water Board staff estimate approximately eight hours is necessary for planning control actions.

Implementation: Staff concluded there are a variety of methods owners of domestic animals can use to help control wastes. Some methods include installing livestock exclusion barriers, stables for horses, corrals, and manure bunkers at locations that prevent runoff from entering surface waters.

1. **Livestock Exclusion Barriers:** Based on a survey of professional and technical literature, the Iowa State University Extension program (Mayer and Olsen, 2005) reports the cost of fencing to exclude livestock from areas where animal waste can impact surface waters ranges from \$0.18 to \$1.51 total construction costs per foot of fence (\$950.40 to \$7,972.80 per mile, respectively). Mayer and Olsen (2005) report that that all configurations of fencing shown in their publication “can be used with cattle, and that woven wire and high tensile electrified fencing can be used with sheep, and woven wire can be used with hogs.”

2. Horse Stables: Horses can be boarded at stables. According to the American Miniature Horse Association, miniature horses can be boarded in a professional stable for \$50 to \$150 per month per horse and full size horses can be boarded for \$200 to \$550 per month per horse. The cost depends on the facilities, pasture, and riding opportunities (<http://www.amha.com/MarketTools/Profitability.html>).

3. Corral Cost: According to a Progressive Farmer website, a corral (excluding the head gate) can cost less than \$7,000. Gates cost (at the most) between \$3,000 and \$4,000 (<http://www.progressivefarmer.com/farmer/animals/article/0,24672,1113452,00.html>)

4. Manure Bunker Costs: Ecology Action has worked with landowners to install manure bunkers. Manure bunkers help prevent stormwater from infiltrating the manure thereby causing runoff of pollutants from the manure. According to Ecology Action, the average cost for constructing a manure bunker on properties in the Aptos Creek watershed was approximately \$4,000. (Each bunker was constructed on an existing cement slab, or a new one was poured and employed some type of cover - either a permanent roof or a tarp.) The cost of bunker construction varies greatly depending on the size and materials choice. When looking at bunkers for the entire program, costs ranged from \$3,000 to \$15,000 (Reference: E-mail dated 5-1-2007 from Jennifer Harrison of Ecology Action).

Inspections/Monitoring: The landowner cost for inspections/monitoring will vary depending upon the elements of the Nonpoint Source Implementation Program. The cost could be low for frequent periodic property inspections to assess and prevent discharges. Costs are higher if a landowner performs water quality monitoring.

Reporting: Central Coast Water Board staff estimated it would take approximately eight hours of land owner time to prepare a report to the Water Board. This report is required every three years.

Tabulated Example Costs: Costs associated with on-site management practices for rangeland, grazing animals, and domestic farm animal operations, are tabulated in Table I-1.

Table I-1: Example Costs for Grazing Animal Management Practices.

| Practices | Cost | Practices | Cost |
|--------------------------|--|-------------------------|-----------------------------------|
| | (Maximum, unless otherwise noted) | | (Maximum, unless otherwise noted) |
| Access Road (repair) | \$5/ft. | Pond (repair) | \$10,000 ea. |
| Attend Training Sessions | Usually <\$40 (transportation/registration fess)** | Range Seeding: | |
| Brush Mgt. | \$10/ac. | Native species | \$250/ac. |
| Channel Vegetation | \$600/ac. | Introduced species | \$100/ac. |
| Clearing and Snagging | \$10/ft. | Riparian Buffer Strip | \$600/ac. |
| Conservation Tillage | \$20/ac. | Roads* | |
| Cover/Green Manure Crop: | | Culverts and Water Bars | \$150/mile |
| Native species | \$250/ac. | Road Repairs | \$1,500/mile |
| Introduced species | \$100/ac. | Spring Development | \$1,000/ea. |
| Critical Area Planting | \$1,000/ac. | Streambank Protection: | |
| Fence (upland) | \$2/ft. | mechanical | \$100/ft. |

| Practices | Cost | Practices | Cost |
|---------------------------------------|---|------------------------------|-----------------------------------|
| | (Maximum, unless otherwise noted) | | (Maximum, unless otherwise noted) |
| Fence (riparian) | \$2/ft. | Vegetative | \$12.50/ft. |
| Fence, Electric (upland) | \$1.25/ft. | Tank | \$2,500 ea. |
| Fence, Electric (riparian) | \$1.25/ft. | Tree Planting w/ irrigation | \$600/ac. |
| Grade Stabilizer | \$20,000 ea. | Tree Planting w/o irrigation | \$300/ac. |
| Grassed Waterways | \$20/ft. | Trough (w/ concrete pad) | \$1,000 ea. |
| Grazing Management: | | Trough (w/o concrete pad) | \$800/ea. |
| Hardened Stream Crossings | \$2,000 to \$6,000** | Trough (small wildlife) | \$500/ea. |
| Prescribed Grazing | \$6.95/ac. (median)** | Upland Wildlife Habitat Mgt. | \$400/ac. |
| Provide Shade away from riparian area | \$500/accommodate 5-6 cows** (moveable shading structures) | Vegetative Buffer Strip: | |
| Remote waterers in pastures | \$4,500 to \$8,200 to install (could be <\$1,000 if water piped from existing well)** | Native Species | \$200/ac. |
| Rotational Grazing | \$30 to \$70/acre | Introduced Species. | \$75/ac. |
| Streamside livestock exclusion | (see fence est.) Funding may be available through local conservation office** | Wildlife Watering Facility | \$4,000/ea. |
| Pipeline | \$1.25/ft. | | |

Source: NRCS Templeton Service Center Environmental Quality Improvement Program Practices Information (as reported in CCRWQCB Watsonville Slough Pathogen TMDL Project Report, 2005)

* Estimate provided by Cal Poly State Univ. for Chumash Creek Watershed road improvements.

** U.S. Dept. of Agriculture and South Dakota State Univ., 2008. Reicks et al., "Better Management Practices for Improved Profitability and Water Quality": SDSU publication FS994

Table I-2 presents the estimated number of implementing parties in the TMDL project area

Table I-2: Estimated number of properties with domestic animals requiring implementation.

| Category | Land Use* | Project Area Acres* | Number of Property Owner/Operators in Land Use Category** | Number of Properties with Domestic Animal Operations | Number of Properties Requiring Implementation ^E | Number of Acres Requiring Implementation ^F |
|---------------------|----------------------|---------------------|---|--|--|---|
| Grazing Operations | Grazing Lands | 128,276 | 76 ^A | 33 ^C | 17 | 3400 ^F |
| Farm Animals/Horses | Residential Farmland | 12,804 | 138 ^B | 4 ^D | 7 | N.A. |

Data and Assumptions:

* FMMP Land Cover Dataset, from Section 2.1.2.

A: Based on parcel data: approximate amount of assesses in project area having land parcels zoned for grazing by the Monterey County Assessor (51 in Monterey County). Assumed SLO County had half the number of assesses with grazing land compared to Monterey County: SLO County = 25 assesses with grazing land.

B: Equal to total number of households in Project Area based on census block data (see Section 2.1.6)

C: Assumed only a fraction (~50%) of parcel property owners on grazing land are engaged in livestock grazing operations: $12 * 0.5 = 6$

D: Staff's estimated an inventory of less than 100 horses, sheep, goats, and chickens in the project area (see Section 4.1). As such, staff presumes only a small fraction - 5% - of households maintain farm animals or horses: $79 * 0.5 = 4$

E: It is assumed that 50% of properties with livestock grazing operations and 50% of rural residential properties with farm animals/horses will require some form of implementation measures. Some properties reportedly already have implemented management practices; also staff presumes that some properties are currently not contributing to fecal coliform loading to receiving waters.

F. Acres requiring implementation will depend on grazing management method employed (for example, rotational grazing), and the size and number of paddocks. Assume 200 acres average per each grazing operation that requires implementation (200 X 17 = 3400).

In Table I-3 staff provide cost estimates based on a range of land management practices or structural management practices and associated costs (from Table H-1 and narrative previously presented in this Section) that can plausibly be anticipated to be associated with TMDL implementation activities. It is presumed that management practices will focus on measures that limit that amount of time that domestic animals will spend in creek beds, or limit the opportunity for their waste to be discharged to creeks (e.g., grazing management practices, off-stream watering systems, exclusion barriers). However, it is important to emphasize again that the Water Board cannot mandate a specific type of management measure to achieve load allocations. Additionally, staff provides a range of cost estimates based on the median cost, the 25th percentile cost, and the 75th percentile cost of the management measures presented in Table H-3. Staff presumes that range and variety of management measures will be implemented in the project area and that therefore including a 25th percentile and 75th percentile estimate capture a plausible low-end and high-end economic cost estimates, respectively.

Table I-3: Tabulation of range of costs of selected management practices.

| Category | Land or Animal Management Cost Range of Land Management Practices | | Structural Measures Cost Range of Structural Management Practices | |
|--|---|--|---|--|
| | Grazing Operations: Livestock | Prescribed Grazing | \$6.95/acre (median) | Provide Shade away from riparian area |
| Rotational Grazing | | \$30/acre (min) | Remote waterers | \$1000 (min) |
| | | | Remote waterers | \$4,500 (max) |
| | | | Streamside Livestock Exclusion (fencing) | \$950/mile (min)* |
| Rotational Grazing | | \$70/acre (max) | Streamside Livestock Exclusion (fencing) | \$7973/mi le(max)* |
| | | | Attend Training Sessions | \$40 |
| | | | Trough | \$800 (min) |
| | | | Trough | \$1,000 (max) |
| <i>Median cost</i> | | \$30/acre | <i>Median cost</i> | \$875 |
| <i>P25 Cost</i> | | \$18/acre | <i>P25 Cost</i> | \$385 |
| <i>P75 Cost</i> | | \$50/acre | <i>P75 Cost</i> | \$1000 |
| <i>Acres requiring implementation</i> | 3400 | <i>Properties requiring implementation</i> | 17 | |
| Total Cost for Grazing Operations (Acres or Properties Requiring Implementation multiplied by per acre cost or per structural measure cost) | Total Median Cost | \$102,000 | Total Median Cost | \$14,875 |
| | Total P25 Cost | \$61,200 | Total P25 Cost | \$6545 |
| | Total P75 Cost | \$170,000 | Total P75 Cost | \$17,000 |
| Category | Structural Measures Cost Range of Structural Management Practices | | | |
| Rural Residential: Farm Animals/Hobby | Horse Stabling | | \$720/one horse/year (min) | |
| | Horse Stabling | | \$6600/one horse/year (max) | |
| | Corral Construction | | \$10,000 | |

| | | |
|---|--|--------------------------|
| Ranches/Confined Animals | Streamside Livestock Exclusion (fencing) | \$95 / 0.1 mile (min)* |
| | Streamside Livestock Exclusion (fencing) | \$793 / 0.1 miles (max)* |
| | Provide Shade away from riparian area | \$500 |
| | Trough | \$800 (min) |
| | Trough | \$1,000 (max) |
| | Landowner monitoring and inspection | \$0 (time investment) |
| | Manure Bunker | \$3000 (min) |
| | Manure Bunker | \$15000 (max) |
| | <i>Median cost</i> | \$800 |
| | <i>P25 Cost</i> | \$625 |
| | <i>P75 Cost</i> | \$2250 |
| | <i>Properties Requiring Implementation</i> | 7 |
| Total Cost for Rural Residential Properties with Domestic Animals (83 estimated Properties Requiring Implementation multiplied by structural measure cost) | Total Median Cost | \$5,600 |
| | Total P25 Cost | \$4,375 |
| | Total P75 Cost | \$15,750 |

* for fencing cost estimates, grazing operations costs are calculated on a per mile basis. Since rural residential properties are associated with much smaller tracts of land, fencing cost estimate is calculated on one-tenth of a mile basis. Fencing cost estimates are from Mayer and Olsen (2005)

Finally, Table I-4 tabulates the range of costs to implement the TMDL. These represent the collective total cost to all implementing parties over the 13 year timeline of TMDL implementation.

Table I-4: Costs to Implement the TMDL.

| Category | P25 Cost (low) | Median Cost | P75 Cost (high) |
|---|-----------------|------------------|------------------|
| Grazing Operations Land Management Measures | \$61,200 | \$102,000 | \$170,000 |
| Grazing Operations Structural Management Measures | \$6,545 | \$14,875 | \$17,000 |
| Rural Residential: Structural Management Measures | \$4,375 | \$5,600 | \$15,750 |
| Total Aggregate Cost to Implement TMDL | \$72,120 | \$122,475 | \$202,750 |

Sources of Funding

Potential sources of financing to TMDL implementing parties are described in the Basin Plan, Chapter 4, in section VIII.C.6, as reproduced below.

On private lands whose owners request assistance, the U.S. Natural Resource Conservation Service (NRCS), in cooperation with the local Resource Conservation Districts (RCDs), can provide technical and financial assistance for range and water quality improvement projects. A Memorandum of Understanding is in place between the U.S. Soil Conservation Service and the State Board for planning and technical assistance related to water quality actions and activities undertaken to resolve nonpoint source problems on private lands.

In addition, staff provides some examples of funding sources below:

Environmental Quality Incentives Program (EQIP)

EQIP is a program designed to address significant natural resources needs and objectives including: soil erosion and water pollution prevention, farm and ranch land production, agricultural water conservation, and wildlife habitat preservation and development. EQIP offers financial and technical assistance to eligible participants for the installation of vegetated, structural and management practices on eligible agricultural land. EQIP typically cost-shares at 90 percent of the costs of eligible conservation practices. Incentive payments may be provided for up to three years to encourage producers to conduct management practices they would not otherwise do without the incentive. Limited resource producers and beginning farmers and ranchers may be eligible for cost-share up to 90 percent.

More information is also available from the local NRCS or RCD office or at the Monterey County RCD website at

http://www.rcdmonterey.org/Growers_Ranchers_Landowners/funding_services.html

Clean Water Act 319(h) Grant Program

This program is a federally funded nonpoint source pollution control program that is focused on controlling activities that impair beneficial uses and on limiting pollutant effects caused by those activities. The 319(h) grant program offers funds to non-profit organizations, government agencies including special districts, and education institutions. Specific non-point source activities that are eligible for 319(h) funds may include, but are not limited to: the implementation of best management practices for agricultural drainage, physical habitat alteration, channel stabilization, sediment control, hydrologic modification, livestock grazing, irrigation water management, and confined animal facilities management. Other eligible activities include technology transfer, ground water protection, pollution prevention, technical assistance, facilitation of citizen monitoring and facilities of education elements of projects.

More information is also available from the California State Water Resources Control Board site at http://www.swrcb.ca.gov/water_issues/programs/grants_loans/319h/index.shtml, or contact [Melenee Emanuel](#), State Board Division of Water Quality, 319(h) Grants Program at (916) 341-5271.

Other Sources of Funding for Growers, Ranchers, and Landowners

The Monterey County RCD can provide access to and/or facilitate a land owners application for federal cost-share assistance through various local, state and federal funding programs. For certain projects the RCD may also be able to apply for other grant funds on behalf of a cooperating landowner, grower or rancher. More information is available at the Monterey County RCD website at http://www.rcdmonterey.org/Growers_Ranchers_Landowners/index.html.