

Central Valley Regional Water Quality Control Board

2 October 2023

Mr. Orvil McKinnis, Watershed Coordinator
Westside San Joaquin River Watershed Coalition
P.O. Box 2157
Los Banos, CA 93635

SUBMITTAL DATE CHANGE REQUEST – ANNUAL SURFACE WATER MONITORING REPORT – WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION

On 29 August 2023, Central Valley Regional Water Quality Control Board (Water Board) staff received a request from the Westside San Joaquin River Watershed Coalition (Coalition) to annually add three months for preparation of the surface water annual monitoring reports (AMR). This would change the annual due date from 30 June to 1 October. The monitoring period covered by each report would remain the same (1 March through 28 February). The Coalition's request letter is attached.

Based on staff's recommendations in the attached Staff Review Memo, I am partially approving the Coalition's request. Beginning in 2024, the Coalition may submit the AMR on 1 October, with the exception of the Management Plan Status Report portion of the AMR. The Management Plan Status Report will still be due 30 June each year.

If you have any questions or comments regarding this letter, please contact Dana Kulesza at dkulesza@waterboards.ca.gov or (916) 464-4847.

Adam Laputz  Digitally signed by Adam Laputz
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Water Boards

Patrick Pulupa
Executive Officer

Enclosures: 29 August 2023 Coalition request letter, AMR due date
25 September 2023 Staff Review Memo

Central Valley Regional Water Quality Control Board

TO: Sue McConnell, Chief Petra Lee
Water Resources Control Engineer Senior Environmental Scientist
Irrigated Lands Regulatory Program Irrigated Lands Regulatory Program

FROM: Dana Kulesza
Engineering Geologist
Irrigated Lands Regulatory Program

DATE: 25 September 2023

**SUBJECT: SUBMITTAL DATE CHANGE REQUEST – ANNUAL SURFACE WATER
MONITORING REPORT – WESTSIDE SAN JOAQUIN RIVER
WATERSHED COALITION**

On 29 August 2023, Central Valley Regional Water Quality Control Board (Water Board) staff received a request from the Westside San Joaquin River Watershed Coalition (Coalition) to annually add three months to the period of time between when a surface water monitoring year ends and when the Annual Monitoring Report (AMR) is due. Currently the Coalition has four months to prepare the AMR; if this request is approved, the Coalition would have seven months. This would change the annual due date from 30 June to 1 October. The monitoring period covered by each report would remain the same (1 March through 28 February).

Staff reviewed the request letter and met with Coalition representatives on 8 September to discuss. During the meeting, Coalition representatives specified that the main issue driving the request for three additional months to prepare the AMR is related to the time it takes to receive, process, analyze, and summarize all laboratory analytical reports.

During the meeting, I discussed my concern regarding receiving the Management Plan Progress Report three months later, which currently comes as a part of the AMR. The Management Plan Progress Report is a high priority report from the Coalition, as it provides the detailed information on actions that occurred during the past year to address management plan exceedances. ILRP staff need to know as soon as possible how priority pollutant water quality issues, including pyrethroids, other pesticides, and toxicity were addressed during the reporting period. Management plans must be completed as soon as practicable, and in order for staff to determine if this is occurring, the reports must be available for review as timely as possible.

During the 8 September meeting, I suggested as an option to continue submitting the Management Plan Progress Report on 30 June but submit the rest of the AMR on

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

1 October. Because the laboratory reports are not part of the Management Plan Progress Report, this change would address the Coalition's tight timeline issue with the lab reports while still allowing Water Board staff to review the Management Plan Progress Report on the currently approved timeline. Coalition representatives were receptive to this option.

Staff recommends that the Management Plan Progress Report continue to be submitted annually on 30 June, while the due date for the rest of the AMR be adjusted to 1 October.