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## Central Valley Regional Water Quality Control Board

6 May 2025

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

### **REVIEW OF THE MANAGEMENT PLAN COMPLETION REQUEST FOR 19 MANAGEMENT PLANS, WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION**

Thank you for submitting the 12 February 2025 request to complete 19 Surface Water Quality Management Plans. The request covers management plans in 10 subwatersheds.

Based on the staff findings and recommendations in the enclosed memorandum, I am approving the completion of all 19 management plans; Thank you for your efforts in addressing these constituents and improving water quality.

If you have any questions regarding this letter, please contact Dana Kulesza at [dana.kulesza@waterboards.ca.gov](mailto:dana.kulesza@waterboards.ca.gov) or 916-464-4847.

Sincerely,

Adam Laputz  Digitally signed by Adam Laputz  
Date: 2025.05.06 11:56:35 -07'00'

Patrick Pulupa  
Executive Officer

Enclosure: Staff Review Memo, WSJR Management Plan Completion Request



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## Central Valley Regional Water Quality Control Board

**To:** Petra Lee  
Senior Environmental Scientist  
Irrigated Lands Regulatory Program

**FROM:** Dana Kulesza  
Engineering Geologist  
Irrigated Lands Regulatory Program

**DATE:** 11 March 2025

**SUBJECT: REVIEW OF COMPLETION REQUESTS FOR 19 MANAGEMENT PLANS – WESTERN SAN JOAQUIN RIVER WATERSHED COALITION**

On 12 February 2025, the Western San Joaquin River Watershed Coalition (Coalition) submitted a request for completion of 19 Surface Water Quality Management Plans at 10 monitoring sites in accordance with Waste Discharge Requirements General Order R5-2013-0002-11 (Order). The Coalition is required to implement management plans for constituents that exceed applicable water quality objectives or trigger limits at the same site more than once in a three-year period. In this memo, staff evaluated available information for the 19 management plans to determine whether the requirements for management plan completion have been met.

Management plans can be petitioned for completion once the following Order requirements are met: (1) at least three years of compliance with receiving water limitations during the times of year<sup>1</sup> when previous exceedances occurred, including consideration of peak use periods when the parameter is likely to be present, (2) documentation of third-party education and outreach to applicable members in the impaired watershed, (3) documentation of management practice implementation that address the exceedances, and (4) demonstration of management practice effectiveness at addressing the water quality exceedances.

Table 1 below presents a data review summary for the management plan completion request, which includes data through November 2024. Table 4 below is from the Management Plan Completion Request and provides a list of implemented practices in response to the management plans. Please see the completion request document for

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<sup>1</sup> Samples collected within one month before or after the exceedance month will be considered the "same time of year."

detailed information on the monitoring history and management practices implemented in each watershed.

**STAFF FINDINGS AND RECOMMENDATIONS**

**Non-legacy Constituents**

Monitoring data demonstrates that the water quality impairments addressed by these management plans are no longer observed. This is likely due to the documented outreach, education, and implementation of effective management practices by enrolled Coalition members. Staff recommends the management plan completion requests be approved.

**Legacy Constituents**

Commercial use of the legacy pesticide DDT ceased in 1972. Although limited recent water quality data is available, it is likely DDT and its breakdown product, DDE, remain bound to the sediment in and around Hospital Creek, Marshall Road Drain, and Orestimba Creek as potential water quality issues. The Coalition has taken steps to identify areas of high risk for sediment discharge and erosion, and enrolled members in these areas are required to develop and implement Sediment and Erosion Control Plans. To the extent these constituents remain present in the waterway, it is presumably outside of the manageable control of members and unlikely to be remedied by a management plan. Staff recommends completion of these management plans with direction to the Coalition to ensure continued outreach regarding the need to maintain Sediment and Erosion Control Plans in identified high-risk areas.

*Table 1. Management Plan Monitoring Data Evaluation*

Monitoring Site	Management Plan	Exceedances (count, date range)	Number of samples collected after last exceedance <sup>2</sup>	Required 3 years, time of year, and peak use monitored? <sup>3</sup>
Hospital Creek	DDE <sup>4</sup>	45, 2007-2021	n/a	n/a
Los Banos Creek at China Camp Road	ammonia	8, 2008-2020	40	yes
Los Banos Creek at Highway 140	pH	10, 2007-2020	49	yes

<sup>2</sup> Count does not include visits where site was dry and sample could not be collected.

<sup>3</sup> Since pesticide monitoring is no longer required for legacy use pesticides, this requirement does not apply to legacy use pesticides.

<sup>4</sup> Pesticide monitoring is required based on local, active use in each watershed. Since pesticides no longer registered for use (legacy use pesticides) are not being used, including DDE, monitoring is no longer required.

Monitoring Site	Management Plan	Exceedances (count, date range)	Number of samples collected after last exceedance <sup>2</sup>	Required 3 years, time of year, and peak use monitored? <sup>3</sup>
Marshall Road Drain	arsenic	3, 2006-2021	17	yes
	DDE <sup>4</sup>	23, 2007-2020	n/a	n/a
Mud Slough upstream of San Luis Dam	malathion	2, 2011-2013	100	yes
Newman Wasteway	pH	10, 2005-2021	39	yes
	pyrethroids	3, 2021	23	yes
	<i>Hyalella</i> toxicity (sed.)	6, 2005-2020	7	yes
Orestimba Creek	electrical conductivity	50, 2004-2017	43	yes
	arsenic	2, 2017-2018	17	yes
	copper	5, 2006-2017	32	yes
	DDE <sup>4</sup>	81, 2007-2017	n/a	n/a
	dimethoate	5, 2004-2017	20	yes
Poso Slough	pH	17, 2008-2020	49	yes
	dimethoate	3, 2013-2021	16	yes
	<i>Hyalella</i> toxicity (sed.)	5, 2008-2021	5	yes
Salt Slough at Lander Avenue	diuron	8, 2007-2020	35	yes
Salt Slough at Sand Dam	Water flea toxicity	8, 2005-2021	28	yes

## Enclosure: Available Upon Request

### Table 4 from the Management Plan Completion Request

**Table 4. Focused Outreach Monitored Watersheds, year, and newly implemented management practices**

that was enclosed with this Staff Review Memo is **AVAILABLE UPON REQUEST** by contacting the Central Valley Water Board's Irrigated Lands Regulatory Program at

[irrlands@waterboards.ca.gov](mailto:irrlands@waterboards.ca.gov) or (916) 464-4611.