

## Central Valley Regional Water Quality Control Board

12 May 2025

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

### MANAGEMENT PLAN COMPLETION APPROVAL – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Thank you for submitting the 11 December 2024 management plan completion request to remove specific constituents from select San Joaquin County and Delta Water Quality Coalition (Coalition) site subwatershed management plans. The request proposes to remove seven site/constituent pairs from the management plan monitoring schedule.

The Coalition has implemented management plans according to requirements in the Waste Discharge Requirements General Order R5-2014-0029-07 for Growers within the San Joaquin County and Delta Area that are Members of a Third-party Group.

Based on the information provided in the request letter and in the enclosed staff review, I approve the completion of management plans for the following site/constituent pairs requested for approval.

#### Approved

- Kellogg Creek Along Hoffman Lane (DDT, DDE)
- Mokelumne River @ Bruella Rd. (*E. coli*)
- Sand Creek @ Hwy 4 Bypass (DDT, DDE)
- Upper Roberts Island Drain (Ammonia as N)

If you have any questions or comments regarding the review, please contact Chris Jimmerson at [chris.jimmerson@waterboards.ca.gov](mailto:chris.jimmerson@waterboards.ca.gov).

Sincerely,

Adam Laputz   
Digitally signed by Adam Laputz  
Date: 2025.05.13 12:51:10 -07'00'  
Water Boards

Patrick Pulupa  
Executive Officer

Enclosure: Staff Review Memo

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

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## Central Valley Regional Water Quality Control Board

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

**FROM:** Chris Jimmerson  
Environmental Scientist  
Irrigated Lands Regulatory Program

**DATE:** 23 December 2024

**SUBJECT:** **REQUEST TO REMOVE SITE AND CONSTITUENT PAIRS  
FROM MANAGEMENT PLAN MONITORING – SAN  
JOAQUIN COUNTY AND DELTA WATER QUALITY  
COALITION**

The San Joaquin County and Delta Water Quality Coalition (Coalition) is required to implement management plans for constituents that exceed water quality trigger limits at the same site more than once in a three-year period per Order No. R5-2014-0029-07 (Order). The Central Valley Water Board received an 11 December 2024 request from the Coalition to remove a total of seven site/constituent pairs from the management plan monitoring schedule (i.e. management plan completion request). The site/constituent pairs are discussed in this memorandum.

The Coalition's management plans are subject to the requirements found in the Order. The following key components must be addressed in the request: (1) at least three years of compliance with receiving water limitations during the times of year when the parameter is most likely to be present by considering periods of peak use, (2) documentation of third-party education and outreach, (3) documentation of management practice implementation, and (4) demonstration of management practice effectiveness.

Staff evaluated the information provided by the Coalition on a case-by-case basis to determine whether the components for management plan completion have been addressed. One of the key components is addressing if there are at least three or more years with no exceedances during the times of the year when the pollutant is most likely to be present by considering periods of peak use. The site/constituent management plan pairs are as follows:

- Kellogg Creek Along Hoffman Lane (DDT, DDE)
- Mokelumne River @ Bruella Rd. (*E. coli*)
- Sand Creek @ Hwy 4 Bypass (DO, DDT, DDE)
- Upper Roberts Island Drain (*Ammonia as N*)

There has been sufficient monitoring for six of the requested site/constituent pairs, sufficiently demonstrating that the water quality problems are no longer occurring; there is insufficient monitoring for dissolved oxygen (DO) at Sand Creek to demonstrate impairments are no longer occurring. In addition, documentation of outreach/education was provided when applicable, including documented implementation of management practices at all sites. Based on the water quality data and other evidence discussed below, staff recommends approval of management plan completion described in Table 1 below.

*Table 1. Management Plans Monitoring Data Evaluation*

Management Plan	Most Recent Exceedance	Monitoring Events Since Last Exceedance	Requirements for Completion Met?
<b>I. Kellogg Creek along Hoffman Ln</b>			
<i>DDE</i>	NA	NA	Yes
<i>DDT</i>	NA	NA	Yes
<b>II. Mokelumne River @ Bruella Rd</b>			
<i>E. coli</i>	3/17/20	36	Yes
<b>III. Sand Creek @ Hwy 4 Bypass</b>			
<i>DO</i>	6/16/15	8	No
<i>DDE</i>	NA	NA	Yes
<i>DDT</i>	NA	NA	Yes
<b>IV. Upper Roberts Island Drain</b>			
<i>Ammonia as N</i>	8/20/19	39	Yes

## **I. Kellogg Creek Along Hoffman Lane (DDT, DDE)**

The Coalition proposed DDT and DDE for management plan completion. To prevent sediment runoff that may contain legacy pesticides and breakdown products, Sediment and Erosion Control Plans (SECP) are developed and implemented by growers and kept on-farm. SECPs include management practices to reduce erosion in designated high-risk areas. These constituents are discussed in further detail in Section V. below.

## **II. Mokelumne River @ Bruella Rd. (*E. coli*)**

The Coalition proposed *E. coli* for management plan completion. The management plan was not approved for completion last year because at least three years of compliance to receiving waters was not met during the times of year when the pollutant is most likely to be present.

Currently, three years of compliance have been met with continued focused outreach in the watershed scheduled for 2024-2026. Based on documented outreach, management practice implementation and management practice effectiveness, staff recommend approval of the management plan completion request.

The Coalition notes past documented instances of dairy discharges in the subwatershed that may have contributed to the *E. coli* exceedances. The Central Valley Water Board will follow up with any dairy discharges brought to the attention of ILRP staff.

A specific *E. coli* management plan was in the process of development in 2018 but has not yet been approved. Staff and the Coalition may prioritize and resume those efforts.

	E.coli												Legend
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	
2024													Exceedance
2023													Sampled
2022													Dry/No Access
2020			579.4										
2019		613.1							298.7				
2018											313		
2016			325.5										
2015													
2014													
2013										517.2			
2012												2400	
2011									240	550			
2010													
2009										1100			
2008				390									
2006													
2005													
2004													

### III. Sand Creek @ Hwy 4 Bypass (DO, DDT, DDE)

The Coalition proposed completing the DO management plan. The requirement of at least three years of compliance with receiving water limitations during the times when the pollutant is most likely to be present has not been met. The Coalition will need to collect additional samples in similar months for at least another year.

Dissolved Oxygen												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2024												
2023												
2021												
2017												
2016												
2015					4.75	3.21						
2014									4.55			
2013					3.75	4.6						
2012			4.28		3.91			4.28				
2011						4.78	3.97	4.7	4.82			
2008						2.92	3.52	4.91				
2007								4.9				
2006												

Legend
Exceedance
Sampled
Dry/No Access

The Coalition proposed DDT and DDE for management plan completion. To prevent sediment runoff that may contain legacy pesticides and breakdown products, Sediment and Erosion Control Plans (SECP) are developed and implemented by growers and kept on-farm. SECPs include management practices to reduce erosion in designated high-risk areas. These constituents are discussed in further detail in section V. below.

#### IV. Upper Roberts Island @ Bonetti Rd. (Ammonia as N)

The Coalition proposed Ammonia as N for management plan completion. The management plan was not approved for completion last year because at least three years of compliance during the summer and fall, when the pollutant is most likely to be present, were not met.

Currently, three years of compliance have been met with focused outreach in the watershed scheduled for 2023-2025. Based on documented outreach, management practice implementation, and management practice effectiveness, staff recommends approval of the management plan completion.

Ammonia as N												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2024												
2023												
2022												
2020												
2019								2.1				
2018											1.8	
2017												
2016												

Legend
Exceedance
Sampled
Dry/No Access

**V. Legacy Pesticides (DDT, DDE)**

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 Kellogg and Sand Creeks as a potential water quality issue. 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.