

Central Valley Regional Water Quality Control Board

26 January 2024

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 17 December 2023 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 five 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. Additional monitoring data are needed for the remaining management plans.

Approved

- East Orwood Tract Drain (pH)
- Union Island Drain @ Bonetti Rd (Nickel, DDE)

Not Approved

- Mokelumne River @ Bruella Rd (*E.coli*)
- 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.

 Digitally signed by Adam Laputz
Date: 2024.01.26 10:53:47 -08'00'

Patrick Pulupa, Esq.
Executive Officer

Enclosure: Staff Review Memo

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

Central Valley Regional Water Quality Control Board

TO: Petra Lee
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Chris Jimmerson
Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 2 January 2024

**SUBJECT: REQUEST TO REMOVE SITE/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 a 16 November 2023 request from the Coalition on 17 December 2023 to remove a total of five 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:

- East Orwood Tract Drain (pH)
- Mokelumne River @ Bruella Rd. (*E. coli*)
- Upper Roberts Island Drain (Ammonia as N)
- Union Island Drain @ Bonetti Rd. (Nickel, DDE)

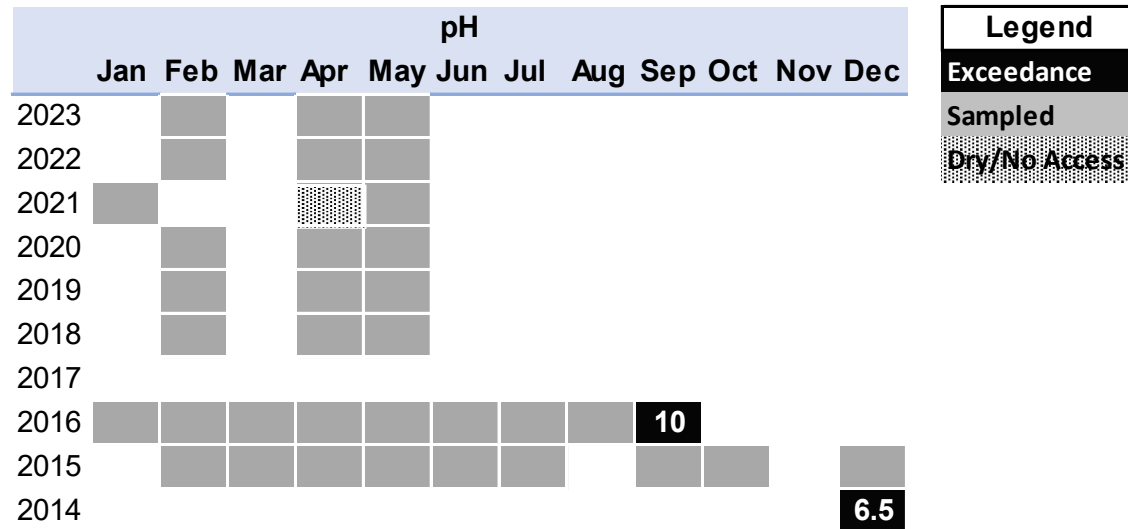
There has been sufficient monitoring for three of the five requested site/constituent pairs, sufficiently demonstrating that the water quality problems are no longer occurring. In addition, documentation of outreach/education was provided when applicable, including documented implementation of management 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?
I. East Orwood Tract Drain			
pH	9/20/2016	18	Yes
II. Mokelumne River @ Bruella Rd			
<i>E. coli</i>	3/17/2020	15	No
III. Upper Roberts Island Drain			
Ammonia as N	8/20/2019	21	No
IV. Union Island Drain @ Bonetti Rd			
Nickel	NA	NA	Yes
DDE	NA	NA	Yes

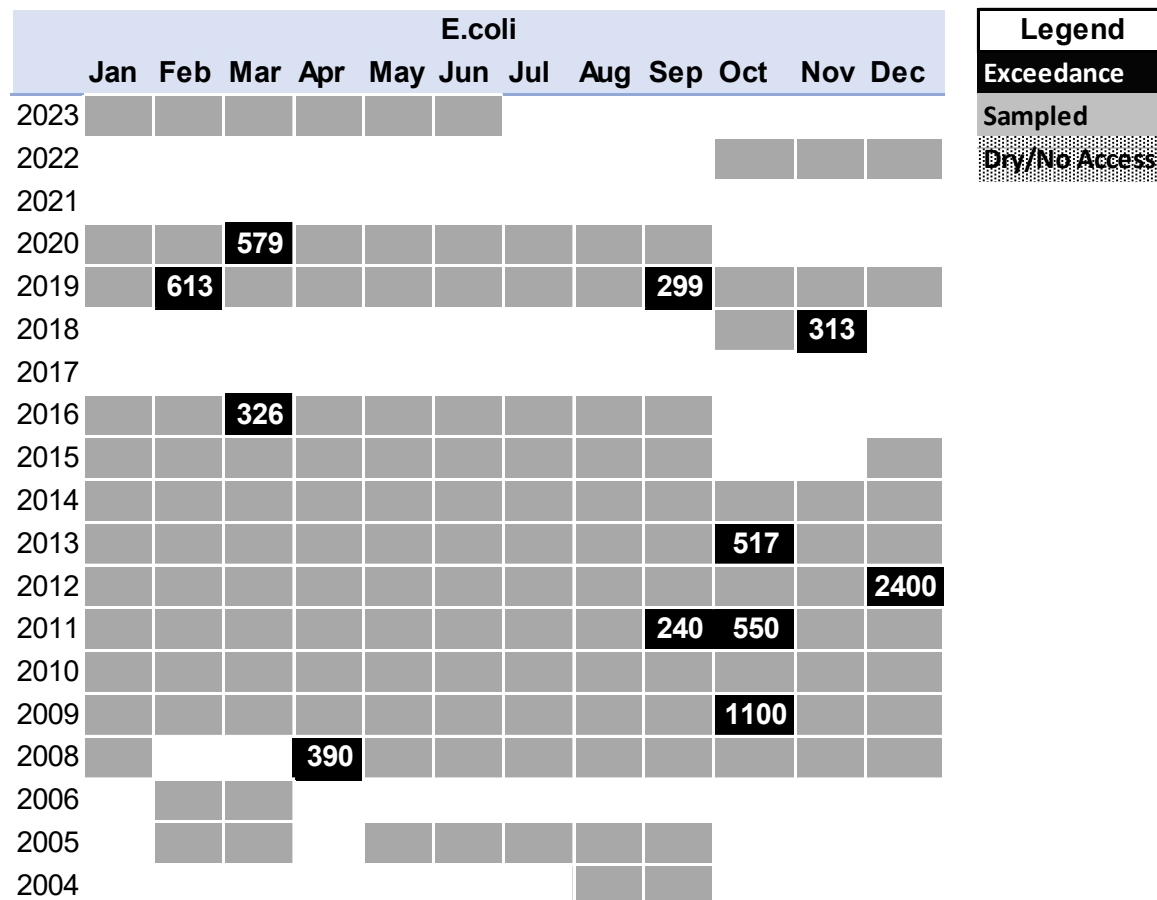
I. East Orwood Tract Drain (pH)

The Coalition proposed pH for management plan completion. Since 2016, 18 sampling events have taken place with no additional exceedances. Management plan monitoring for field parameters is not performed by the Coalition independent of other scheduled monitoring. The element of at least three years of compliance with receiving water limitations during the times of year when the pollutant is most likely to be present has been met. Although management practices implemented by growers on their farming operations do not directly affect pH, focused outreach due to herbicides and sediment erosion has taken place. Consequently, staff supports completion of the pH management plan.



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

The Coalition proposed *E. coli* for management plan completion. At least three years of compliance to receiving water limitations during the times of year when the pollutant is most likely to be present has not been met because 2021 has no reported monitoring data. Consequently, *E. coli* monitoring must continue, at a minimum, February through April 2024 without exceeding the trigger limit for the management plan to be considered complete.



Staff has observed that the table provided in the request did not align with the supplied data. Corrections have been made to the *E. coli* table to rectify this discrepancy. Importantly, these corrections did not substantially alter staff's review.

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

The Coalition proposed ammonia as N for management plan completion. At least three years of compliance to receiving water limitations during the summer and fall when the pollutant is most likely to be present has not been met. Consequently, Ammonia as N monitoring must continue as scheduled for the 2024 Water Year (WY) without exceeding the trigger limit for the management plan to be considered complete.

Ammonia as N												
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
2023												
2022												
2021												
2020												
2019								2.1				
2018											1.8	
2017												
2016												

Legend

Exceedance

Sampled

Dry/No Access

Legend
Exceedance
Sampled
Dry/No Access

Staff has observed that the table provided in the request did not align with the supplied data. Corrections have been made to the ammonia table to rectify this discrepancy. Importantly, these corrections did not substantially alter staff's review.

IV. Union Island Drain (Nickel)

The Coalition proposed nickel for management plan completion. Union Island Drain inherited the nickel management plan from the former Grant Line site subwatersheds after Grant Line monitoring was transferred to Union Island. No nickel exceedances have been observed at Union Island.

Based on the Pesticide Evaluation Protocol, monitoring has taken place per the approved monitoring schedule with no exceedances. Agriculture does not apply nickel, and for the Focused Outreach years 2022-2024 the Coalition recorded growers installing cover crops improving soil erosion problems affecting approximately 800 acres. Consequently, staff supports completion of the nickel management plan.

Nickel												Legend	
Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec												Exceedance	
2023												Sampled	
2022												Dry/No Access	
2021													
2020													
2018													
2017													
2016													

V. Union Island Drain (DDE)

The Coalition has recommended DDE for management plan completion. Union Island Drain has taken on the DDE management plan from the previous Grant Line site subwatersheds following the 2015 transfer of Grant Line management plan monitoring to Union Island. DDT and its breakdown product, DDE, were banned in the early 1970s, categorized as legacy pesticides, and no current use has been reported.

The Coalition discontinued monitoring for DDE in the 2015 WY because it is a legacy pesticide and is no longer applied by agriculture. Organochlorines and Group A pesticides were discontinued, as approved, in the 2015 Water Year. Plus, the Pesticide Evaluation Protocol does not mandate monitoring for legacy pesticides.

In addition, for the Focused Outreach years 2022-2024 the Coalition recorded growers installing cover crops improving soil erosion problems affecting approximately 800 acres. DDE is known to bind to sediments. Consequently, staff support the completion of the DDE management plan.

A monitoring/exceedance table, like those for other management plan completion requests, was not prepared.