



Central Valley Regional Water Quality Control Board

11 March 2025

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

Ms. Melissa Turner, Principal
MLJ-LLC
1480 Drew Ave., Suite 130
Davis, CA 95618

APPROVAL OF THE 2025 WATER YEAR MONITORING PLAN UPDATE ADDENDUM – SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION

Thank you for submitting the 15 January 2025 addendum to modify the San Joaquin County and Delta Water Quality Coalition's approved Monitoring Plan Update (MPU) for the 2025 Water Year. The addendum is in response to the Coalition's evaluation of the potential for risks or threats to water quality that are associated with exceedances that occurred during the May through September 2024 monitoring period that was not available when the Coalition prepared its original 1 August 2024 MPU.

When a water quality objective or trigger limit is exceeded at a Core site, the third-party must evaluate the potential for similar risks or threats to water quality associated with that parameter at the Represented sites. If pesticide use or other factors indicate a risk, the third-party must perform monitoring for a minimum of two years during the period of highest risk of exceedance of water quality objectives for that parameter.

Staff conducted a review and reconciliation of discrepancies of the Coalition's evaluation and justifications for monitoring decisions and agrees with the Coalition's January 2025 addendum. Based on staff's evaluation, I approve the 2025 Water Year monitoring schedule amendment discussed in the attached memorandum.

If you have questions regarding this letter, please contact Chris Jimmerson by email at Chris.Jimmerson@waterboards.ca.gov.

Sincerely

Adam Laputz  Digitally signed by Adam Laputz
Date: 2025.03.11 15:33:28 -07'00'

Patrick Pulupa
Executive Officer

Enclosure: Staff Review of MPU

NICHOLAS AVDIS, CHAIR | PATRICK PULUPA, 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 program
Irrigated Lands Regulatory Program

DATE: 27 February 2025

**SUBJECT: 15 JANUARY 2025 MONITORING PLAN UPDATE ADDENDUM -
SAN JOAQUIN COUNTY AND WATER QUALITY COALITION**

On 15 January 2025, the San Joaquin County and Delta Water Quality Coalition (Coalition) submitted a Monitoring Plan Update (MPU) addendum with justification for revisions to the approved 2025 Water Year monitoring schedule. This was in response to the Coalition's evaluation of the potential for risks or threats to water quality that are associated with exceedances that occurred during the May through September 2024 monitoring period. The May through September monitoring data was not available when the Coalition prepared its annual 1 August 2024 MPU. Per Order requirements, exceedances at a Core site trigger an evaluation of similar risks to water quality at the associated Represented sites.

Monitoring from May through September 2024 resulted in exceedances of the Water Quality Trigger Limits for field parameters (DO, pH, and SC), *E. coli*, pyrethroids, water column toxicity to *Selenastrum capricornutum*, *Ceriodaphnia dubia*, and sediment toxicity to *Hyalella azteca*.

As per the requirements of the Order, the Coalition evaluated the monitoring schedule for revisions, as summarized below under Revised Monitoring and No Additional Monitoring.

Staff identified discrepancies between the Excel spreadsheet Attachment A and the request letter. After reconciliation with the Coalition, no changes to the monitoring schedule were necessary.

REVISED MONITORING

Due to a second *C. dubia* toxicity exceedance at *Terminous Tract Drain @ Hwy 12* within three years, a new management plan has been initiated for the 2025 Water Year.

As a result, management plan monitoring will replace the previous Represented monitoring schedule, though the monthly schedule will remain unchanged.

No ADDITIONAL MONITORING

Based on the approved 2025 WY MPU (submitted August 1, 2024), the monitoring schedule already includes the necessary monitoring for field parameters (DO, pH, SC), *E. coli*, *S. capricornutum*, pyrethroids, and *H. azteca* sediment toxicity at designated sites. No additional subwatershed monitoring is needed, as these are already covered in the approved 2025 WY MPU schedule.

STAFF RECOMMENDATION

The Coalition considered pesticide use data, monitoring results, ongoing management plans and utilized the Pesticide Evaluation Protocol to update the monitoring schedule for the 2025 WY addendum. Staff recommend approval of the 2025 WY MPU Addendum.