
Central Valley Regional Water Quality Control Board

17 June 2015

East San Joaquin Water Quality Coalition
c/o Parry Klassen, Executive Director
1201 L Street
Modesto, CA 95954

San Joaquin Valley Drainage Authority
c/o Joseph McGahan, Watershed Coordinator
Westside San Joaquin River Watershed Coalition
887 N Irwin Street
PO Box 1122
Hanford, CA 93232

San Joaquin County Resource Conservation
District
c/o Jack Hamm, President
3422 W Hammer Lane, Suite A
Stockton, CA 95219

FINAL APPROVAL OF GROUP OPTION FOR MANAGEMENT PRACTICES EVALUATION PROGRAM: EAST SAN JOAQUIN WATER QUALITY COALITION, SAN JOAQUIN COUNTY AND DELTA WATER QUALITY COALITION, WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION

Thank you for your 8 May 2014 and 23 September 2014 submittals of additional information for the Management Practices Evaluation Program (MPEP) Group, as I requested in my 18 March 2014 conditional approval letter.

Based on the attached staff review of the MPEP Agreement and additional information, I approve the MPEP Group formed to develop and carry out the management practices effectiveness evaluations required by Orders applicable to the irrigated lands in the Central Valley. The MPEP Group consists of the East San Joaquin Water Quality Coalition, San Joaquin County Resource Conservation District on behalf of the San Joaquin County and Delta Water Quality Coalition, and San Joaquin Valley Drainage Authority on behalf of the Westside San Joaquin River Watershed Coalition. Any modifications to the MPEP Group will require my approval, including any additional signatories.

If you have questions regarding this letter, please contact Sue McConnell at 916-464-4798, or by e-mail at Sue.McConnell@waterboards.ca.gov.

Sincerely,

Original signed by Adam Laputz for

Pamela C. Creedon
Executive Officer

Enclosure: Review of MPEP Group under Orders R5-2012-0116, R5-2014-0002 and R5-2014-0029

cc: **[via email only]**

Clay Rodgers, Central Valley Water Board
Susan Fregien, Central Valley Water Board
Glenn Meeks, Central Valley Water Board
Johnny Gonzales, State Water Resources Control Board
Mike Wackman, San Joaquin County and Delta Water Quality Coalition
Theresa Dunham, Somach Simmons & Dunn
Jennifer Spaletta, Spaletta Law PC
Diane Rathmann, Linneman, Burgess, Telles, VanAtta, Vierra, Rathmann, Whitehurst & Keene

Central Valley Regional Water Quality Control Board

TO: Sue McConnell
Supervising Water Resources Control Engineer
Irrigated Lands Regulatory Program

FROM: Jelena Hartman *Original signed by*
Senior Environmental Scientist *Jelena Hartman*
IRRIGATED LANDS REGULATORY PROGRAM

DATE: 10 June 2015

SUBJECT: MANAGEMENT PRACTICES EVALUATION PROGRAM GROUP OPTION
UNDER ORDERS R5-2012-0116, R5-2014-0002 AND R5-2014-0029

On 8 May 2014 and 23 September 2014, the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received additional information for the Group Option for Management Practices Evaluation Program (MPEP), described in the Waste Discharge Requirements General Order R5-2012-0116 (General Order). The information was submitted in response to the 18 March 2014 conditional approval of the Agreement for MPEP Group consisting of the East San Joaquin Water Quality Coalition, the San Joaquin County and Delta Water Quality Coalition¹, and the Westside San Joaquin River Watershed Coalition² (Coalitions).

Staff recommends issuance of the final approval of the MPEP Group, as all requirements for the use of the Group Option under the General Order (section VIII.D.2.a) are met. The additionally submitted information addresses elements that were identified as incomplete in the initial 14 January 2014 submission of the MPEP Group Agreement:

- Person(s) responsible for the completion of the required workplans and reports,
- Organizational chart showing the reporting relationships and responsibilities, and
- Identification of the technical experts who will prepare and implement the workplans.

On 8 May 2014, the Coalitions submitted the draft Memorandum of Agreement for Implementing MPEP Group Option (MOA), a draft amendment to the MOA, and a draft organizational chart showing the reporting relationships and responsibilities. The MOA supplements the MPEP Group Agreement, and describes how the members of the MPEP Group intend to operate through a Coordination Committee consisting of two representatives appointed by each Coalition. The MOA identifies persons responsible for the completion of the required workplans and reports as the executive officer or watershed coordinator designated by each Coalition. Final and executed MOA and the amendment were received on 23 September 2014, along with an organizational chart depicting membership and structure of the Coordination Committee.

¹ Waste Discharge Requirements for Growers within the San Joaquin County & Delta Area that are Members of a Third-Party Group, Order No. R5-2014-0029

² Waste Discharge Requirements for Growers within the Western San Joaquin River Watershed that are Members of a Third-Party Group, Order No. R5-2014-0002

The 23 September 2014 submission also includes a letter describing an envisioned process and schedule for the development of the MPEP Work Plan. Recognizing that expertise in multiple disciplines will be necessary to address the range of crops and conditions in the Coalitions' regions, the Coalitions proposed that a conceptual study outline be developed first. The conceptual study outline of the MPEP studies will be developed with participation of stakeholders and technical experts from commodity groups, California Department of Food and Agriculture, University of California Cooperative Extension, and the International Plant Nutrition Institute. After input from the Central Valley Water Board, the conceptual study design will be utilized to guide development of separate MPEP Work Plans for annual and for perennial crops. Based on a 10 June 2015 email communication, the Coalitions anticipate that the conceptual study outline will be drafted and submitted to the Central Valley Water Board by 26 June 2015. The MPEP Group Work Plan, and the Groundwater Quality Assurance Project Plan for MPEP are due by 4 June 2016 (4 June 2014 Conditional Approval Letter of the East San Joaquin Water Quality Coalition's Groundwater Quality Assessment Report).

The proposed approach to develop a conceptual study outline will ensure that the dynamics of nitrogen use will be adequately addressed for various crops while providing consistency between study designs for annual and perennial crops. The summary of qualifications of four named scientists who agreed to participate demonstrates that competent experts with experience in agricultural production will be involved in guiding the development of the conceptual study design. Additionally, the Coalitions will ask consulting hydrogeologists, who have been contracted for the development of each Coalitions' Groundwater Quality Assessment Reports, to provide technical guidance on the development of the work plans. The selection of technical experts and assistance from the consulting hydrogeologists previously working on Coalitions' groundwater assessment reports is appropriate. The two technical experts who will develop the individual work plan components for annual and perennial crops, and initiate and supervise studies will be selected once the conceptual study design is finalized.