



**California Regional Water Quality Control Board**  
**Central Valley Region**  
**Katherine Hart, Chair**



**Matthew Rodriguez**  
*Secretary for  
Environmental Protection*

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**Edmund G. Brown Jr.**  
*Governor*

30 September 2011

David Guy, President  
Northern California Water Association  
Sacramento Valley Water Quality Coalition  
455 Capitol Mall, Suite 335  
Sacramento, CA 95814

**SACRAMENTO VALLEY WATER QUALITY COALITION ANNUAL MANAGEMENT PLAN  
PROGRESS REPORT REVIEW**

Thank you for submittal of the Sacramento Valley Water Quality Coalition (Coalition) Annual Management Plan Progress Report (MPPR), which was received on 18 April 2011. Staff has completed a review (enclosed with this letter) of the MPPR for compliance with Monitoring and Reporting Program Order R5-2009-0875 (MRP Order) and the Sacramento and San Joaquin River Basin Plan for specific Total Maximum Daily Load (Basin Plan – TMDL) requirements.

In general, the Coalition provided the information needed to meet the basic Management Plan reporting requirements. However, staff identified several sections of the report where more information is needed to determine compliance with Management Plan requirements.

In the next several months, ILRP Staff will begin working with the Coalition to develop a new Order for Waste Discharge Requirements and an updated Monitoring and Reporting Plan Order. Under these new Orders, many of the requirements for an MPPR will be more fully described in order to assure that the Coalition's management plan reporting is sufficient for staff to determine if compliance is met.

If you have any questions regarding this letter, please contact Mark Cady at 916-464-4654, or by email at [mcady@waterboards.ca.gov](mailto:mcady@waterboards.ca.gov).

*Original signed by*

Joe Karkoski  
Program Manager  
Irrigated Lands Regulatory Program

Susan Fregien  
Senior Environmental Scientist  
Monitoring and Implementation Unit

Enclosures

cc: Bruce Houdesheldt, NCWA  
Claus Suverkropp, LWA  
Ben Letton, RWQCB

***California Environmental Protection Agency***



# California Regional Water Quality Control Board Central Valley Region

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**TO:** Susan Fregien  
Senior Environmental Scientist  
Irrigated Lands Regulatory  
Program

**FROM:** Mark Cady  
Environmental Scientist  
Irrigated Lands Regulatory  
Program

**DATE:** 22 September 2011

**SIGNATURE:** Original signed by Mark Cady

## **REVIEW OF 1 MARCH 2010 ANNUAL MANAGEMENT PLAN PROGRESS REPORT SACRAMENTO VALLEY WATER QUALITY COALITION**

On 18 April 2011, the Central Valley Regional Water Quality Control Board (Water Board) received the 2010 Annual Management Plan Progress Report (MPPR) submitted by the Sacramento Valley Water Quality Coalition (Coalition). This is the second annual MPPR required pursuant to the Monitoring and Reporting Program Order No. R5-2009-0875 (MRP Order) and the Management Plan approved by the Water Board Executive Officer on 2 February 2009.

Water Board staff has evaluated the conformance of this MPPR to MRP Order requirements and the Coalition's approved 2009 Management Plan. The section titles and item numbers of this review are the same as those used in the MPPR Checklist (see attached). Staff derived the MPPR Checklist from the MRP Order and the reporting description in the 2009 Management Plan (page 13). This Checklist was used to verify that the MPPR content met the minimum prescribed report requirements. Staff's review is organized into four sections: MRP Order requirements, Management Plan components, TMDL compliance reporting, and proposed Management Plan changes. Additional comments are provided in the MPPR Checklist (attachment), while some items that require more detailed explanation are included below.

A very useful table is included at the beginning of the MPPR, making it easy to reference management plan elements and activities while reviewing the rest of the report.

### **A. MRP Order Requirements**

All eight items in this section are described on pages 29 and 30 of the MPPR. For items 2, 3, 4, 6 and 8, the report refers to the Management Practice Implementation and Performance Goals documents, which were scheduled to be submitted on 6 May 2011, for 17 constituent-water body combinations.

### **B. Management Plan Report Components**

Items 4.0-4.8 review the results of monitoring for various constituents included in the Management Plan. The report would be improved if all detections and exceedances from

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management plan monitoring were presented in a single table, similar to Table 20 on page 57-58 of the Coalition's 2010 Annual Monitoring Report. In addition, it is important to compare the number of samples in which constituents of concern were not detected to the number of detections and exceedances at each monitoring site. Many of the constituent-water body combinations were not adequately monitored in 2010, however this problem has been addressed in meetings between Water Board staff and the Coalition, and is documented in a letter from the Executive Officer to the Coalition dated 3 December 2010.

Item 5.0, Results of Source Evaluations. The Coalition submitted a Source Evaluation Report for 22 waterways with Pathogen Indicator Management Plans on 24 February 2011.

Item 6.0, Outreach Documentation. The following comments appear in the staff review memo (sent to the Coalition on 3 December 2010) that evaluated the 2009 MPPR, and can be applied to outreach reported in the current MPPR as well:

*Outreach is clearly documented ..., including a general description of the outreach program, descriptions of landowner meetings and direct mailings including numbers of attendees and pieces of mail sent. To improve upon the value of this program, outreach meetings should have clearly stated goals and include evaluation elements: end-of-meeting or after-meeting surveys, or some other measure to determine how well the meeting met its goals.*

Coalition outreach efforts are described generally on page 14 of the MPPR, while specific outreach activities are listed in the table in Appendix A. This table could be improved with the following changes:

- Specify the role played by the entities listed in the column labeled "Organization", i.e. is each group listed the host, the presenter of information, a meeting sponsor or do they play some other role?
- List the name and organization of the presenter or whomever made direct grower contacts.
- Specify the exceedances to which the outreach is a response, including waterway, constituent and date of exceedance, as well as the number of growers directly contacted.

Item 8.0, Recommendations for Management Plan monitoring. The first sentence of paragraph 4, page 15 reflects a misconception that was addressed in discussions between the Coalition and Board staff since this report was submitted. Management Plan monitoring must always continue on a regular schedule unless otherwise authorized by the Executive Officer.

Item 12.0, Results of pesticide application reviews. In subwatersheds with Registered Pesticide or Toxicity Management Plans, review of pesticide applications is an essential element of source evaluation. This is also a necessary step as follow up to exceedances of Water Quality Objectives in waterways covered by a pesticide TMDL. Pesticide and Toxicity Source Evaluations were not a part of this report.

**C. TMDL Compliance Reporting.** Water Board staff is currently finalizing the review of the Coalition's 2010 Chlorpyrifos and Diazinon Monitoring and Compliance Report, covering 2009 and 2010. When completed, staff will send the review memo to the Coalition.

**D. Proposed Management Plan Changes.** Three of the five changes listed in this report were elaborated in the 2010 MPPR. The remaining two listed changes have been requested in letters submitted to the Water Board in the last year. This section ends with a proposal requesting an updated Management Plan document be created and approved to consolidate and document changes that have taken place in Management Plan requirements since the original Management Plan document was approved in 2009. At this time it is unlikely that a new Management Plan document can be developed until after the completion of a new Monitoring and Reporting Order, scheduled for June 2013.

SVWQC Management Plan Progress Report  
Review Checklist

Report Name: SVWQC Management Plan Report		Reviewer Name: Mark Cady				
Submittal Date: 18 April 2011		Review Date: 19 September 2011				
Item No.	Management Plan Component Description	Acceptable A	Unacceptable U	Incomplete I	Page No. (Section No.)	Comments
<b>A. MRP Order Requirements</b>						
1	Identification of irrigated agriculture source -- general practice or specific location -- that may be the cause of the water quality problem, or a study design to determine the source.	X			Pg. 29	In 2010, the Coalition submitted source evaluation reports for 9 Toxicity and 7 Registered Pesticides Management Plans. A source evaluation report for pathogen indicators was submitted on 2/24/11.
2	Identification of management practices to be implemented to address the exceedances.			X	Pg. 29	Report states that this item will be addressed in Implementation Goals documents, due 5/6, 6/30 and 9/30/11.
3	Management practice implementation schedule. Implementation may occur through another Water Board regulatory program designed to address the specific exceedances.			X	Pg. 29	Report states that this item will be addressed in Implementation Goals documents, due 5/6, 6/30 and 9/30/11.
4	Management practice performance goals with a schedule.			X	Pg. 29	Report states that this item will be addressed in Implementation Goals documents, due 5/6, 6/30 and 9/30/11.
5	Waste-specific monitoring schedule.	X			Pg. 29	A 2011 management plan monitoring schedule was submitted by the Coalition and reviewed by Staff earlier in 2011. A draft monitoring schedule for 2012 is due to the Water Board by 9/30/11.
6	A process and schedule for evaluating management practice effectiveness.			X	Pg. 29	Implementation Goals documents (pending).
7	Identification of the participants and Coalition Group(s) that will implement the Management Plan.	X			Pg. 29	Table 6 of MPPR; and Implementation Goals documents (pending).
8	An identified routine schedule of reporting to the Regional Water Board.	X			Pg. 30	Table of 2011 ILRP Deliverables, submitted 1/24/11.

SVWQC Management Plan Progress Report  
Review Checklist

Item No.	Management Plan Component Description	Acceptable	Unacceptable	Incomplete	Page No. (Section No.)	Comments
		A	U	I		
	<b>B. Management Plan Report Components</b>					
1.0	Signed Transmittal letter	X				
2.0	Title Page	X				Title Page is complete and adequate.
3.0	Table of Contents	X			Pgs. ii-iii	
4.0	Results of monitoring	X			Pg. 7	The MRPP provides a brief summary of management plan monitoring results. However, the results presented lack sufficient detail to demonstrate compliance with Management Plan monitoring requirements.
4.1	Registered Pesticides	X			Pg. 7	
4.2	Toxicity	X			Pg. 9	
4.3	Legacy Pesticides	X			Pg. 9	
4.4	Pathogen indicators	X			Pg. 9	
4.5	Trace Metals	X			Pg. 9	
4.6	Salinity	X			Pg. 9	
4.7	DO and pH	X			Pg. 9	
4.8	Nutrients	X			Pg. 10	
5.0	Results of Source Evaluations	X			Pg. 10	Source evaluation is reviewed for E. coli only (full report submitted 2/24/11). Other evaluations are due in 2011.
6.0	Outreach Documentation	X			Pg. 14 & Appx. A	Copies of outreach materials were submitted in the Annual Monitoring report.
7.0	Summary of completed baseline management practices inventories			X	Pg. 14	A report for pathogen indicators has been submitted and is referenced here. This report also references two additional reports to be submitted in April and June 2011.
8.0	Recommendations for Management Plan monitoring	X			Pg. 15	
9.0	Evaluation of progress toward completion of management plan elements.	X			Pg. 29	This evaluation is presented as a brief review of the items in Part A of this checklist.
10.0	Proposed Goals for additional implementation			X	Pg. 15	Refers to Performance Goal documents due in April and June, 2011.

SVWQC Management Plan Progress Report  
Review Checklist

Item No.	Management Plan Component Description	Acceptable	Unacceptable	Incomplete	Page No. (Section No.)	Comments
		A	U	I		
11.0	Updates to the list of required management plans	X			Pg. 16, Tables 5 & 6	
12.0	Results of pesticide application reviews			X		No review of pesticide applications is presented, these should be reported in Source Evaluation Reports.
	<b>C. TMDL Compliance Reporting</b>	X			Pgs 27-28	References 2010 TMDL Report.
	<b>D. Proposed Management Plan Changes</b>	X			Pg. 17	Management plan change requests will be addressed in reponse to separate request letters when possible; most management plan changes will be addressed as part of developing the Coalition's WDR and MRP Orders.