



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



CHS

Matthew Rodriguez
 Secretary for
 Environmental Protection

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Edmund G. Brown Jr.
 Governor

7 December 2011

Mr. Joseph McGahan
 Watershed Coordinator
 Westside San Joaquin Watershed Coalition
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**WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION – FOCUSED
 WATERSHED MANAGEMENT PLAN III – POSO SLOUGH at INDIANA AVE., SALT
 SLOUGH at SAND DAM, AND SALT SLOUGH at LANDER AVE.**

Thank you for submittal of the Westside San Joaquin River Watershed Coalition (Coalition) 30 September 2011 Focused Watershed Management Plan III (Focused Plan III or Plan). The Plan describes intensified efforts in the high-priority watersheds of Poso Slough and Salt Slough. Staff of the California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) has determined that the Coalition's Plan and associated actions meet management plan requirements in Monitoring and Report Program Order Number R5-2008-0831 and the Coalition's approved October 2008 Management Plan General Approach. Based on the following information, I am granting approval of the Coalition's Focused Plan III.

The Coalition's Focused Plan III identifies actions to reduce pesticide detections, aquatic toxicity, and sediment discharge in the high priority watersheds. The Coalition has already determined that agriculture is a significant contributor to the water quality concerns related to the observed water quality impairments. The Coalition is surveying its members to identify specific agricultural practices that may be contributing to these problems. As stated in the Coalition's Plan, cooperation by growers to achieve water quality goals is a condition of Coalition membership.

The Coalition's Plan describes the interim performance goals and completion dates. The Coalition will work with staff to determine specific performance goals through upcoming meetings. The Coalition will submit the Management Practice Performance Goals and Schedule by 30 June 2012.

If you have any questions regarding this approval, please contact Susan Fregien at (916) 464-4813, or by email at sfregien@waterboards.ca.gov.

Pamela C. Creedon
 Executive Officer

Enclosures: Staff Memorandum
Management Plan Check List



California Regional Water Quality Control Board Central Valley Region

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TO: Susan Fregien
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: 31 October 2011

SUBJECT: 30 SEPTEMBER 2011 FOCUSED WATERSHED MANAGEMENT PLAN
III- WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION

The California Regional Water Quality Control Board, Central Valley Region (Central Valley Water Board) received the Westside San Joaquin River Watershed Coalition's (Coalition) 30 September 2011 Focused Watershed Management Plan III (Focused Plan) for Poso Slough and Salt Slough. The Focused Plan was submitted to meet the requirements of Monitoring and Reporting Program Order R5-2008-0831 (MRP Order). The Focused Plan generally mirrors the approved 2010 Focused Plan II for Westley Wasteway, Del Puerto Creek, and Orestimba Creek, and meets the management plan requirements.

According to the Coalition's 2008 General Approach Management Plan, the Focused Plan will address specific actions to reduce discharges within specific subwatersheds. To accomplish this, the Coalition re-stated the eight requirements found in the 2008 General Approach Management Plan, then provided a discussion of the specific efforts as subparts for each of the eight requirements. Using the 2008 General Approach Management Plan, MRP Order, and the Focused Plan, Staff derived a checklist for this review. It provides an itemized account of the compliance components.

The review section titles found below and section numbers are the same as the titles used in the attached checklist. Staff used the checklist to determine whether the Focused Plan meets the minimum Focused Plan requirements. If the minimum requirements were not met or items warranted further explanation, this memorandum provides a discussion. For those items that did not require further discussion, these are briefly noted in the attached checklist.

Staff recommends that the Coalition use consistent naming conventions when discussing the General Approach requirements and specific Focused Plan requirements in the body of the report. For example, the eight listed General Approach requirements on page 1 are similar to the section names in the report, but are too dissimilar to quickly

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scan through the sections and ensure they are indeed the same topic. The focused efforts on page 1 list the title of those efforts as well, but do not sufficiently match those that are in the report body because they are summarized or modified to a degree such that those descriptions appear ambiguous.

Management plan Component Checklist Item No. and Name from Checklist

1.0 Source Identification - Identify parcels

Tables 1 and 2 (Page 3 and 4) list the exceedances for Salt Slough and Poso Slough subwatersheds. When summing the number of exceedances, the number of tests should also be included.

Section 2 (Page 4 and 5) describes the potential sources of exceedances concerning analytes ammonia and *E.coli*, among others. It is not clear if the Coalition is currently conducting or plans to continue to conduct any research to investigate the sources. On page 3 of the Focused Plan, it states that *E.coli* exceedances in the Salt Slough subwatershed require a Management Plan. In the October 2008 Management Plan General Approach, pages 19-20, the Coalition stated that it would first implement special studies to determine the sources of *E.coli*. Part of the strategy included developing an approach to map irrigated pasture, confined animal facilities and areas where animal waste fertilizer may be applied. The Executive Officer will be requesting that a work plan be submitted jointly by Coalitions to develop a region-wide conceptual approach to address *E.coli*. Therefore, the Coalition should anticipate that *E.coli* management plan tasks will become a higher priority and managed through the Focused Plan approach rather than the General Management Plan.

As per staff comments on the June 2011 Semi Annual Monitoring Report (SAMR), a progress update concerning the efforts towards managing the *E.coli* exceedances will be provided in the November 2011 SAMR.

3.1 Determination of Management Practice Implementation

After the Coalition determines the appropriate management practices through the survey responses, the Coalition members will implement those applicable management practices. In general, management practices will include improved irrigation systems, pesticide use reduction, spray rig calibration, identification of sensitive overspray regions, tail water pond construction, tail water return systems, and drip system installation. These activities primarily target pesticide exceedances, related toxicity, and sediment discharge. Possibly, more management practices will be identified after the Coalition analyzes the survey responses. However, most management practices will revolve around reducing tail water discharge.

4.0 Develop Performance Goals and a Schedule

The Coalition stated that it will prepare the Performance Goals by 30 June 2012 after completing Focused Plan Step #4 (intensified outreach to growers) for a comprehensive Performance Goal Table. In a 28 October 2011 conference call with the Coalition, the

Coalition and staff agreed that Performance Goals can be prepared prior to completing Step #4 and will work with staff to merge the Interim Performance Goals found on page 10 to any other goals developed.

To assist the Coalition with the development of the Performance Goals, staff will provide suggestions in upcoming meetings to enhance the current tracking methods used to measure the Interim Performance Goals found on page 10 of the Focused Plan. Staff's objective will be to merge all of the project goals and due dates as stated in the Focused Plan and map-out the potential outcomes, indicators, and targets so that the goals can be measured.

6.0 Develop a Process & Schedule for Evaluating Management Practice Effectiveness

Section 7 (page 11), states that the effectiveness of management practices implementation will be conducted through the measures as identified on Table 3, page 10. The header labels in the Table are not labeled as "measures". The headers are labeled as *Focused Plan Step*, *Outcome*, and *Completion Date*. The labels should match the text for clarity.

Item 4 of Table 3 mentions "Determine effective MPs and develop next steps (Performance Goals)". In the 28 October conference call, the Coalition stated the "next steps" relate to implementing management practices. Most of the management practices will attempt to eliminate tail water discharge.

Westside Focused Management Plan III Checklist
Poso Slough at Indiana Ave., Salt Slough at Sand Dam, Salt Slough at Lander Ave.

Report Name: Westside Focused Watershed Management Plan III Poso Slough & Salt Slough		Reviewer Name: Chris Jimmerson				
Submittal Date: 30 September 2011		Review Date: 10/12/11				
Item No.	Management Plan Components Westside Focused Watershed Management Plan III	Review			Document(s) Page No. (Section No.)	Comments
		Acceptable	Unacceptable	Incomplete		
1.0	Source Identification - Identify parcels	X			4,5	Coalition identified most flea and algae toxicity linked to chlorpyrifos and diazinon and will continue to source exceedances. Source of ammonia exceedances managed under general approach b/c of lower priority.
1.1	Detailed subwatershed maps	X			Figure 1	Map included identifies Salt Slough and Poso Slough geographic areas. BMP survey will be circulated to growers beginning in Fall 2011.
1.2	Identify parcels	X			1,2,3	Identified Poso and Salt Slough as Management Plan areas.
2.0	Identification of management practices to be implemented	X			9	Generally includes: Reduce use, calibrate spray rigs, ID sensitive overspray regions, construct tail water ponds, hold tail water, install drip systems. More BMP's to be identified after results from BMP surveys (baseline) are analyzed.
2.1	Development of survey document	X			Figure 2	Copy of the BMP Survey included in Focus Mgt Plan
2.2	Determination of pesticide use baseline	X			5,6	PURs obtained from Morced Ag Com. Baseline will be reported in the MP SAMR.
2.3	Completion of grower survey	X			10	Submittal and return of surveys will be complete by 3/31/12.
2.4	Finalize management practice survey findings, develop baseline MP inventory	X			9,10	Surveys findings complete by 6/30/12.
2.5	Determine effective MP's and develop next steps	X			5,6,10	An inventory of management practices will be collected through grower surveys. 100% return rate is required. Coalition will first determine what MP's are in place then determine additional MP's needed.
2.6	E. coli watershed-specific field surveys to identify potential agricultural contributions	X			General approach	As per staff comments on the June 2011 SAMR, a progress update concerning the efforts towards managing the E. coli exceedances will be provided in the November 2011 SAMR.
3.0	Develop a management practice implementation schedule	X			8	Once surveys are returned, a mgt practice implementation schedule will be developed.
3.1	Determination of management practice implementation	X			6	BMP implementation inventoried through surveys after implementation. Surveys distributed at meetings and households, or hand delivered.
4.0	Develop specific performance goals and a schedule	X			9, 10	Mgt Plan states Perf. goals will be completed by end of June 2012 after evaluating the BMP surveys. Interim performance goals provided on page 10.
4.1	Intensified outreach to growers	X			7,8	Outreach includes group meetings, individual field meetings, mailers.
5.0	Develop a waste-specific monitoring schedule	X			General approach	Monitoring schedule previously determined as part of the General approach and MRP Order.
5.1	Surveillance-level monitoring	X			General approach	
5.2	Constituent-specific monitoring	X			3	Table 1 lists constituents requiring management plan. Monitoring schedule previously determined as part of the General approach and MRP Order.
5.3	Approach to implement additional management practices	X			6,7,8	Steps for approach: Determine baseline through surveys; Determine additional BMP to implement; communicate to grower; document implementation; report in SAMR.
6.0	Develop a process & schedule for evaluating management practice effectiveness	X			8,9,10	The process for evaluating BMPs includes evaluating water quality results and BMP implementation. Coalition to complete grower surveys by March 31, 2012. Determine effective Mgt Practices by June 30, 2012. Then report results in the SAMRs.
6.1	Monitoring to determine management practice effectiveness	X			11 section 7	Monitoring results will be discussed in the SAMR
7.0	Identify the participants and coalition group(s) that will implement the Management Plan	X			11 section 8	Participants include the Coalition's consultant, growers, and irrigation districts
8.0	Identify a routine schedule of reporting to the Regional Water Board	X			11 section 9	Mgt Plan reporting will occur in SAMRs, quarterly monitoring migs

Footnotes: Bolded item numbers are the general approach, and the sub-item numbers are the focused plan efforts to address the general approach items at a more detailed level.