



California Regional Water Quality Control Board

Central Valley Region

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RESOLUTION NO. R5-2003-0105: REVIEW OF WATERSHED EVALUATION REPORT AND MONITORING AND REPORTING PROGRAM PLAN – EAST SAN JOAQUIN VALLEY WATER QUALITY COALITION

On 1 April 2004, the Central Valley Regional Water Quality Control Board (Regional Board) received a Watershed Evaluation Report (WER) and Monitoring and Reporting Program Plan (MRP Plan) from the East San Joaquin Valley Water Quality Coalition (Coalition Group). This information was submitted in order to meet the conditions of Resolution R5-2003-0105 and the associated Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands (Waiver) adopted by the Regional Board on 11 July 2003.

On 17 May 2004, Regional Board staff met with Coalition representatives and discussed the required elements of the Waiver that needed additional information or clarification. On 10 June 2004, the Coalition Group provided responses to the Regional Board staff comments. On 29 June 2004 staff held a conference call with Coalition representatives and discussed the major issues that were not addressed in the Coalition responses. Subsequently, the Coalition Group provided responses on 8 July 2004 to major issues discussed in the conference call. The responses submitted by the Coalition on 8 July 2004 were inadequate and did not meet the Conditional Waiver requirements. The major deficiencies of the Coalition Group WER & MRP Plan submittal are summarized in the Regional Board staff letter dated 2 August 2004.

On 12 August 2004, the Coalition Group provided a letter in response to the Regional Board staff second set of comments dated 2 August 2004. In this letter the Coalition Group stated that the Coalition would provide information requested by the staff on four major elements of the Waiver that include *a map of the watershed, inventory of management practices, production practices and management practices*, if Regional Board staff would provide a response on how these data will be used by the Regional Board staff to produce the desired solution to a water quality problem. Regional Board staff has met with the Coalition Group numerous times as referenced in this letter and explained the use of this information. In their 10 June 2004 response letter the Coalition Group stated that preparing this information is time

consuming and this information will be submitted by April 2005. The latest Coalition Group response, dated 10 August, is inconsistent with the initial response, dated 10 June, questioning why this information, required by the Conditional Waiver, is needed. Regional Board staff requested a map of the watershed including discharge locations, in compliance with the Conditional Waiver, in order to address water quality exceedances when they may occur in the watershed. This information is also requested to ensure that the Coalition's monitoring design is based on drainage and discharge locations in the watershed since the purpose of the MRP is to characterize water quality from discharges from irrigated lands. Lack of this critical element of the Waiver means that insufficient information is available to justify monitoring site selection and results in a lack of knowledge about the drainage in the watershed which impedes the Coalitions ability to take action in a timely manner if an exceedance of water quality occurs in the watershed.

Information requested on management practices and production practices is also questioned in the ESVWQC 10 August 2004 letter. The Coalition asked how will this information be used to improve water quality. The Coalition Group response is inconsistent with responses submitted on 10 June 2004 stating that this information will be collected by April 2005. Staff requested this information to comply with the Waiver and to ensure that when water quality exceedances occur the Coalition will have sufficient information and data about the watershed and practices currently being used in the watershed. It is critical that the Coalition have a plan and a schedule to be able to take appropriate corrective action measure in a timely manner when monitoring shows the need for implementation of management practices.

The Coalition Group has provided insufficient and inconsistent information regarding the number and selection of monitoring sites. The initial plan provided no justification for insufficient monitoring or selection of sites. The Coalition Group 29 June 2004 response to staff comments stated that insufficient monitoring is due to limited funds. On 10 August 2004, the Coalition responses stated that a large number of waterbodies move through the Coalition's region to the San Joaquin River. Almost all of these pass through the urban areas resulting in a much lower number of acres with pure agricultural signals in the drain water. The Coalition stated that they will work with the irrigation district to identify drains that receive water from agricultural watershed only, and the additional monitoring sites will be ready for storm season monitoring. The Coalition had an ample amount of time to coordinate these activities in the watershed prior to submittal of WER and MRP plans in April 2004. The Conditional Waiver requires the Coalition Group to work with the watershed representatives to design monitoring sites that characterize the ag discharge. The information submitted to justify the number of monitoring sites is inadequate and does not meet the Waiver requirements.

Even though the Coalition Group has started monitoring this summer, a quality assurance project plan (QAPP) has not been submitted for review and approval. The Coalition Group should be aware that the monitoring data may not meet Waiver requirements.

Staff has reviewed the WERs and MRP Plans and the Coalition Group responses to staff comments to assess whether the technical information presented meets the terms and conditions of the Waiver and the associated Monitoring and Reporting Program Order. In addition, staff also evaluated the WERs and MRP plans to determine if the information submitted constitutes a technically sound foundation for implementing a surface water monitoring program in the watershed boundaries of the Coalition Group that will characterize the impacts, if any, of discharges from irrigated lands to waters of the state.

Based upon the review of the Coalition Group WERs and MRP plans and responses to staff comments, the information submitted is inadequate and does not meet the Conditional Waiver requirements. Staff scheduled a meeting on 1 September 2004 with the Coalition representatives to determine if the Coalition intends to provide the required information in a timely manner to comply with Conditional Waiver requirements. Based on the responses submitted at this time, staff will not be recommending the Coalition Group WER & MRP Plans for the Executive Officer approval.

If you have any question or comments, call Bill Croyle (916) 464-5817.



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