

Staff's comments on the "SJR C & D Annual TMDL Report" outline

Item 1. Section III.a.

Would this include a description of each site? (e.g. size drainage area, approximate number of irrigated acres, potential run off sources)

Item 2. Section III.d.

Would this include a map of each site and the corresponding drainage area to this site? (e.g. land use information, tributaries that drain to that particular site)

Item 3. Sections IV and VI

Since Sections IV and VI are pertinent to a QAPP, perhaps this could go into a separate part of the report (e.g. Attachment A : QAPP)? The ESJWQC and Westside will have to combined efforts into this section and follow QAPP guidelines. The report needs to be a stand alone document, since is going to be reviewed by staff from other programs as well as Staff from the ILRP (e.g. TMDL)

Item 4. Section VIII. b.i.1.

Is the Coalition planning to provide information on this section using a similar format as the one used in the 2010 Annual MPUR, Table 20 (see below)? If so, Staff would recommend eliminating the last column in Table 20, and adding an asterisk to the values in the "load" column for the calculated values above the established allocations for chlorpyrifos and diazinon. A narrative could be added below explaining potential causes of values being above established allocations. Also, the Coalition could consider adding a general comparison of improvements from previous years. The reason for this recommendation is that these calculated values are for the tributaries and recommended management practices are still being implemented. Thus, having the last column ("load compliance") could be misleading, especially for those who are not familiar with the Coalition's efforts during the last two years of intensive management plan implementation.

Table 20. TMDL load calculations for diazinon and chlorpyrifos runoff in the San Joaquin River for nonpoint source discharges.

Zone	Station Name	Sample Date	Grouping	Chlorpyrifos	Diazinon	Load	Load Compliance
1	Dry Creek @ Wellsford Rd	15/Feb/2005	Storm1		0.011	0.11	Compliant
1	Dry Creek @ Wellsford Rd	17/Aug/2005	Irrigation4	0.024		1.60	Out of compliance
1	Dry Creek @ Wellsford Rd	13/Jul/2006	Irrigation3	0.026		1.73	Out of compliance
1	Dry Creek @ Wellsford Rd	10/Aug/2006	Irrigation4	0.024		1.60	Out of compliance
1	Dry Creek @ Wellsford Rd	11/Feb/2007	Storm1		0.034	0.34	Compliant
1	Dry Creek @ Wellsford Rd	15/May/2007	Irrigation2	0.011		0.73	Compliant
1	Dry Creek @ Wellsford Rd	17/Jul/2007	Irrigation4	0.021		1.40	Out of compliance
1	Dry Creek @ Wellsford Rd	11/Sep/2007	Irrigation6	0.043		2.87	Out of compliance
1	Dry Creek @ Wellsford Rd	22/Jul/2008	Irrigation4	0.03		2.00	Out of compliance
1	Dry Creek @ Wellsford Rd	21/Jul/2009	Irrigation4, MPM	0.013		0.87	Compliant
1	Dry Creek @ Wellsford Rd	18/Aug/2009	Irrigation5, MPM	0.027		1.80	Out of compliance
1	Dry Creek at Waterford	22/Jul/2008	Irrigation4, MPM	0.02		1.33	Out of compliance
1	Dry Creek at Waterford	19/Aug/2008	Irrigation5, MPM	0.023		1.53	Out of compliance
1	Mootz Drain @ Langworth Rd	16/Jun/2009	Irrigation3	0.033		2.20	Out of compliance
1	Mootz Drain @ Langworth Rd	16/Dec/2008	Non Contiguous, Storm3	0.017	0.013	1.26	Out of compliance
2	Hatch Drain @ Tuolumne Rd	24/Jan/2008	Storm1		0.037	0.37	Compliant
2	Lateral 2 1/2 near Keys Rd	21/Jul/2009	Irrigation4	0.049		3.27	Out of compliance
2	Hilmar Drain @ Central Ave	13/Jul/2006	Irrigation3	0.016		1.07	Out of compliance
2	Hilmar Drain @ Central Ave	17/Jul/2007	Irrigation4	0.015		1.00	Compliant
2	Prairie Flower Drain @ Crows Landing Rd	13/Jul/2005	Irrigation3		0.013	0.13	Compliant
2	Prairie Flower Drain @ Crows Landing Rd	17/Aug/2005	Irrigation4	0.029		1.93	Out of compliance
2	Prairie Flower Drain @ Crows Landing Rd	21/Sep/2005	Irrigation5	0.018		1.20	Out of compliance
2	Prairie Flower Drain @ Crows Landing Rd	13/Jul/2006	Irrigation3	0.014		0.93	Compliant
2	Prairie Flower Drain @ Crows Landing Rd	17/Jul/2007	Irrigation4	0.009		0.60	Compliant
2	Prairie Flower Drain @ Crows Landing Rd	28/Aug/2007	Irrigation5, MPM	0.094		6.27	Out of compliance
2	Prairie Flower Drain @ Crows Landing Rd	24/Jan/2008	Storm1		0.026	0.26	Compliant
2	Prairie Flower Drain @ Crows Landing Rd	19/Aug/2008	Irrigation5	0.024		1.60	Out of compliance
2	Westport Drain @ Vivian Rd	17/Jul/2007	Irrigation4	0.018		1.20	Out of compliance
2	Westport Drain @ Vivian Rd	24/Jan/2008	Storm1		0.031	0.31	Compliant
2	Westport Drain @ Vivian Rd	22/Jul/2008	Irrigation4	0.016		1.07	Out of compliance
3	Highline Canal @ Hwy 99	01/Mar/2006	Storm1	0.021	0.048	1.88	Out of compliance

Another recommendation might be to include a separate table just for the six SJR compliance monitoring sites. Since these sites are part of the compliance monitoring it would be more appropriate to include a table with similar format as Table 20 (including last column “load compliance”).

Item 4. Section VIII. b.i.2.

Is the Coalition planning to provide information on this section using a similar format as the one used in the 2010 Annual MPUR, Table 21 (see below)? If so, Staff would recommend using this format only for the six SJR compliance monitoring sites, year (under sample date), and number of tests completed per year. Otherwise, provide a detailed explanation for potential causes of values being above established allocations and a general comparison of improvements from previous years.

Table 21. ESJWQC zone load allocation compliance - tally of compliant load calculations for all data collected from 2004 - 2009 and 2009 only.

ESJWQC Zone	Sample Date Year(s)	Compliant	Out of Compliance
Zone 1	2004 -2009	4	11
Zone 2	2004 -2009	7	8
Zone 3	2004 -2009	8	12
Zone 4	2004 -2009	18	19
Zone 5	2004 -2009	20	15
Zone 6	2004 -2009	7	14
Zone 1	2009	1	2
Zone 2	2009	0	1
Zone 3	2009	0	1
Zone 4	2009	2	0
Zone 5	2009	0	2
Zone 6	2009	0	0

Item 5. Section VIII. c. Objective 3.

Information on the management practices implemented at the tributaries (e.g. high priority site subwatersheds) may be utilized for compliance at the six SJR compliance monitoring locations. For example, a summary of implemented management practices (based on previous survey results) and if there are any structural management practices being constructed, this information could be included as well.

Item 6. Section VIII. d. Objective 4.

A water quality analysis of the monitoring results should be the basis for determining management practices effectiveness. Staff recommends to include a comparative analysis from years previous and post Management Plan approval and implementation (e.g. in the case of the ESJWQC the Management Plan was approved on 20 November 2008).