

WAC

## East San Joaquin Water Quality Coalition

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March 4, 2005

To: Central Valley Regional Water Quality Control Board  
William Croyle  
Shakoora Azimi

Re: Timeframes for BMP compilation and drainage location mapping

In preparing our plan to begin gathering information on Best Management Practices (BMPs) from our coalition landowners, it has become apparent we have underestimated the enormity of this undertaking. We fully intend to provide the Regional Water Board with BMP information used by landowners in our area but there are several interim steps that need to be completed before we can we can effectively query landowners on those practices then compile this information on a farm by farm basis.

### Cropping Information

When land owners sign up for the coalition, they provide us with APN numbers, legal descriptions, acreage and closest water body to each parcel. We do not ask landowners about the crops they are currently growing. This is important information because most BMPs are closely tied to the crops grown. This information needs to be compiled before we send landowners a BMP questionnaire. With more than 100 commercial crops grown in the Coalition region, it would be a waste of resources to send a landowner BMP questionnaires for row crops, field crops and orchards then ask them to throw away those questionnaires that do not apply to the crops they grow.

**Resolution of this issue:** We are in the process of gathering cropping information from the Department of Water Resources, local county agricultural commissioners and other sources to build GIS maps that will contain this information.

**Timeline:** The first iteration of these GIS maps will be provided to the Regional Water Board by May 15, 2005. Completed maps will be provided by June 30, 2005.

### Priority Crops

Based on historical monitoring information from waterways in the coalition region, there is no strong evidence that the majority of the 100 crops grown in the region are contributing to water quality problems (see WER pp 55-59). In fact, the diazinon TMDL being developed for the San Joaquin River is largely attributed to diazinon applied as dormant sprays to orchards (almonds and peaches). The chlorpyrifos TMDL for the San Joaquin River is largely attributed to use of that insecticide on alfalfa and orchards (almonds).

**Resolution of this issue:** It is our recommendation that gathering BMP information on orchard crops and alfalfa grown in our region should be priority. Should Coalition or

Regional Board monitoring indicate that pesticides and other crops are causing water quality problems, the list of crops will be expanded to include them.

**Timeline:** Once we have determined which landowners are growing the priority crops (May 15, 2005), we will initiate BMP surveys of those landowners. The first results of those surveys can be expected to be returned approximately 60 days later, with preliminary results 15 days later (July 31, 2005).

#### **High risk topography, soil types and field location**

Certain types of topography (hilly or sloping land) and soil types (clay and clay loams) have a higher tendency to produce runoff that could potentially reach waterways.

Proximity to a drain or waterway also influences the potential for runoff to reach waterways, especially in a region such as the East San Joaquin Valley where rainfall is often lacking and field drains are non existent because there is rarely if ever a need to transport runoff water.

#### **Resolution of this issue:**

We are in the process of gathering soils and slope information for the irrigated lands in the coalition region. Once this information is in our GIS data base, we can then overlay that information with information on high risk crops to further refine areas where BMP information will be compiled.

**Timeline:** Maps with soils and slope information will be completed by May 15, 2005. This information will be overlaid with cropping information and maps produced by June 30, 2005. This information will be used as part of the process to select growers for BMP surveys.

#### **Compilation of BMPs at the farm level**

Once landowner BMPs survey are completed and returned to the coalition, there is no established method to compile and analyze this information.

#### **Resolution of this issue:**

A software program to compile BMPs of coalition members is in the process of being develop through a PRISM grant managed by the Coalition for Urban Rural Environmental Stewardship. This software will be provided free to coalitions groups for use in their data management systems.

**Timeline:** The first draft of the software is expected to be completed by July 2005. The final software is expected to be available by September 2005 with the Coalition receiving the software shortly thereafter. Data entering from the above surveys will begin immediately with totals and data analysis completed by October 2005.

#### **Coalition response to new monitoring results**

Should toxicity or exceedances be detected in monitoring performed by the Coalition or Regional Board, the Coalition will determine potential sources by examining Pesticide Use Reports and cropping of the upstream subwatershed that drains into that site.

Actions that will be taken with upstream landowners will include informing them of the water quality problem and recommendations on BMPs that have the best potential to mitigate the problem.

***Resolution of this issue***

In addition to the steps described above, the coalition's actions on new monitoring results will ensure that those problems are effectively addressed.

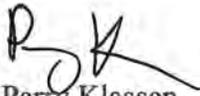
**Timeline:** Landowners upstream of a monitoring site (both Coalition and non-Coalition members) will be notified of a problem approximately 30 days after the laboratory results have been verified and the constituent(s) has been identified. We will work with Regional Board staff to review these results and verify our conclusions. BMP information will also be communicated in mailings and at local grower and crop advisor meetings organized by the coalition and other local farm groups. Commodity and farm groups in the coalition region normally hold outreach meetings from November through March (boards of directors and some committees meet more frequently). Presentations on monitoring results and BMP materials will be provided at those meetings.

In subwatersheds that do not have high risk crops or topography and where no exceedances are discovered, it will be assumed that BMPs used by landowners in that watershed are sufficient to eliminate potential water quality problems.

**Maps of drainages**

We are in the process of gathering data to create maps of coalition drainages. A first draft of this map will be delivered to Regional Water Board on June 30, 2005. We are also coordinating development of these maps with the irrigation districts located in the coalition region. Information from these maps will be combined into the Coalition maps and provided to the Regional Water Board by August 15, 2005.

We believe that the approaches described above will meet the intent of the Conditional Waiver and provide usable information that will lead to water quality improvements. This process provides a baseline that allows appropriate action to address existing problems and should a new exceedance occur.



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