



# Concerns About East San Joaquin Water Quality Coalition Proposed WDR

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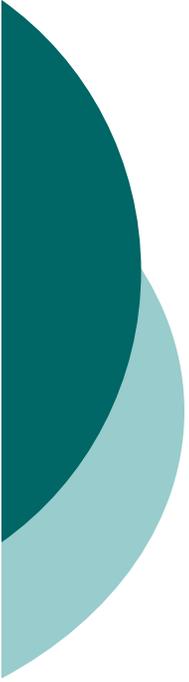
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San Joaquin County and Delta Water  
Quality Coalition



# Overview

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- Determination of Vulnerable Areas
- Groundwater Monitoring
- Farm Evaluation Plans
- Nutrient Management Plans
- Water Quality Criteria



# Current Mapping Vulnerable Groundwater Areas

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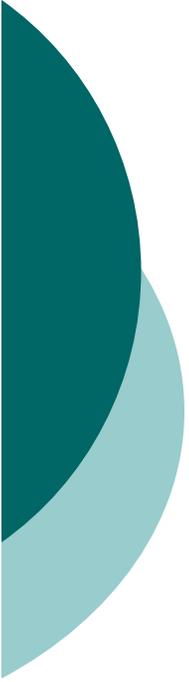
- Need to redefine vulnerable areas
  - Using the DPR vulnerable areas incorrectly – As state in DPR comment
    - Constituent specific
    - Does not translate into Nitrate vulnerability
  - By using the current mapping technique many areas will be in vulnerable ground water area
    - require limited resources to be spent on unnecessary actions



# Groundwater Monitoring

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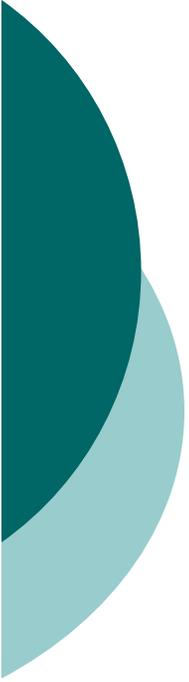
- Monitoring of groundwater
  - Flawed assumption that what leaves the root zone will end up in groundwater
  - Many varying factors when monitoring groundwater
  - Gradients, time, dynamic soils and differing soil types (bacteria, organic matter, past practices)



# Groundwater Monitoring, cont.

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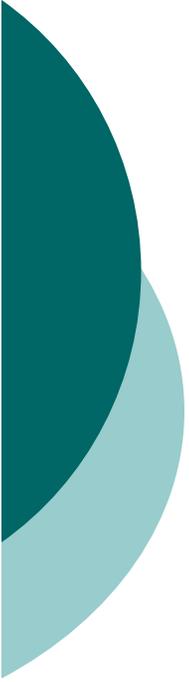
- First encountered groundwater
  - In delta could be 2 feet down
    - Not drinking water yet first encountered
    - Depth depends on water levels in the river
    - Tidal influences



# Farm Specific Evaluations

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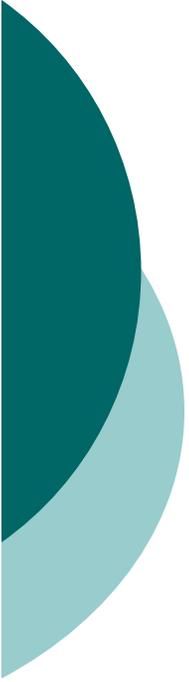
- All farms must submit –
  - Becomes a waste of resources in paperwork
    - Not all farms are contributing to water quality issues
    - All assumed guilty or potential to impact surface or groundwater
  - More efficient to let the Coalitions identify those areas that need to be addressed and use limited resources to implement practices to improve water quality
  - Becomes public information if submitted or requested
    - Electronic submittal of data to regional board



# Nutrient Management Plans

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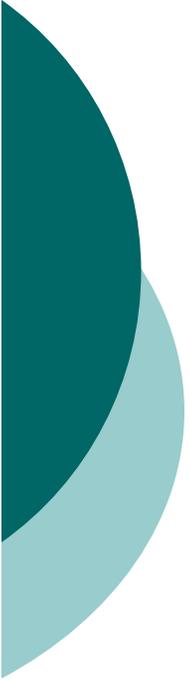
- All farms in vulnerable area have to submit farm-specific nutrient management plans by Certified Crop Advisor
  - Expensive and unnecessary in many cases
  - Farmers have knowledge and training to make management decisions that will improve water quality
  - Submitting information twice a year – not useful and a paperwork nightmare
  - Education and Outreach works



# Regional Board dictating farming practices

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- The way the groundwater program is being developed the Regional Board will tell farmers which practices would be acceptable or not
  - Each operation is unique
  - Many variables in the farming of crops and effects on ground water
    - Rootstocks, soil, rainfall, temperature, seasonal changes



# Water Quality Criteria for Surface Waters

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- Any research or development development of water quality criteria needs to remain with DPR
  - DPR has the expertise and knowledge of pesticides
  - Has established methods for developing criteria



## Let the Coalitions work

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- Coalitions have been working and have improved surface water quality by outreach, education and tracking of water quality improvements
- Let them work together to develop a monitoring program that is workable and feasible
- Allow specific research to take place on management practices and effects on groundwater



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# Central Valley Agriculture Water Quality Coalitions

*Improving Water Quality and Agriculture*