

February 12, 2016

Pamela Creedon, Executive Officer
Sue McConnell, Program Manager
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: *Amendment to the 2015 Monitoring Plan Update for Waste Discharge Requirements General Order R5-2012-0116-R3 for Growers in the Eastern San Joaquin River Watershed*

Dear Ms. Creedon,

The East San Joaquin Water Quality Coalition (ESJWQC) is submitting an amendment to the 2015 Monitoring Plan Update (MPU) and 2016 WY monitoring schedule.

On January 11, 2016, the San Joaquin County and Delta Water Quality Coalition (SJCDWQC) received an email from Regional Board staff indicating sediment toxicity data should be evaluated based on Surface Water Ambient Monitoring Program (SWAMP) protocol as outlined in the August 27, 2014 SWAMP Toxicity Workgroup Recommendation letter.

All previously reported sediment toxicity exceedances were reevaluated based on the following criteria, 1) sediment samples resulting in 80% survival compared to the control or above should not be considered toxic, and 2) sediment samples resulting in 79% survival compared to the control or below should be considered toxic if they are statistically significant.

Sediment toxicity management plans were analyzed on a case-by-case scenario. The results of the management plan analysis for sediment toxicity are included in Table 1 below. Original sediment toxicity results and the subsequent changes to management plans based on SWAMP protocol will be included in the 2016 Annual Report, due May 1, 2016. In some cases, removing a sediment toxicity exceedance based on the SWAMP protocol changed the management plan status of the site subwatershed. As a result, Management Plan Monitoring (MPM) should not be required in sites no longer in a management plan for sediment toxicity (Dry Creek @ Wellsford, Dry Creek @ Rd 18, and Miles Creek @ Reilly Rd; Table 1). Therefore, the 2016 WY monitoring schedule has been updated accordingly.

Based on the analysis provided in the 2015 MPU (approved January 5, 2015), sediment toxicity monitoring was scheduled in the 2016 WY due to a single exceedance at Lateral 6 and 7 @ Central Ave and Mootz Drain downstream of Langworth Pond in 2014. However, the sediment

toxicity results from Lateral 6 and 7 @ Central Ave on March 4, 2014 (80% survival compared to the control) and from Mootz Drain downstream of Langworth Pond on September 9, 2014 (88% survival compared to the control) are no longer considered toxic under the SWAMP protocol. Therefore, monitoring during the 2016 WY for sediment toxicity is not required at these two sites. Table 1 below includes all of the updates that were made to the 2016 WY monitoring schedule based on the reevaluation of sediment toxicity exceedances.

Table 1. ESJWQC changes to sediment toxicity management plans and monitoring schedule based on SWAMP protocol.

Site	Site Type	Management Plan Updates	2016 WY Monitoring Schedule Updates
Dry Creek @ Rd 18	Core	No management plan required.	MPM removed.
Dry Creek @ Wellsford Rd	Core	No management plan required. Two remaining sediment toxicities are not within 3 years.	MPM removed.
Miles Creek @ Reilly Rd	Core	No management plan required.	MPM removed.
Lateral 6 and 7 @ Central Ave	Represented	NA	Sediment toxicity monitoring not required; monitoring was originally scheduled based on September 2014 toxicity (80% compared to the control) which is no longer considered toxic.
Mootz Drain downstream of Langworth Pond	Represented	NA	Sediment toxicity monitoring not required; monitoring was originally scheduled based on the March 2014 toxicity (88% compared to the control) which is no longer considered toxic.

NA-Not applicable; site is not in a management plan for sediment toxicity.

Submitted respectfully,



Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition

Attachment:
ESJWQC 2016 WY monitoring schedule Excel file

Cc:
Sue McConnell, CVRWQCB
Susan Fregien, CVRWQCB
Yared Kebede, CVRWQCB