
Central Valley Regional Water Quality Control Board

20 September 2016

Mr. Parry Klassen
East San Joaquin Water Quality Coalition
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2016 ANNUAL REPORT REVIEW – EAST SAN JOAQUIN WATER QUALITY COALITION

Thank you for submitting the East San Joaquin Water Quality Coalition (Coalition) 2016 Annual Report. Staff reviewed the Annual Report for compliance with Monitoring and Reporting Program (MRP) Order No. R5-2012-0116-R3.

As noted in the attached memorandum and checklist, the Coalition complied with all MRP Order monitoring and reporting requirements.

The Annual Report includes an analysis of the Nitrogen Management Plan (NMP) Summary Report for the 2015 crop year submitted by members in high vulnerability groundwater areas. The Coalition provided a thoughtful analysis of the NMP Summary Report and aggregated the NMP information by township for same crops, similar soil conditions and management practices. A detailed staff review of the NMP Summary Report will be provided in a separate memo.

However, the Coalition obtained only 47% of the NMP Summary Report on-time for analysis and submittal with the Annual Report. The timely reporting of the nitrogen management data in the Annual Report is crucial for the Central Valley Water Board to evaluate the effectiveness of the Coalition outreach efforts and trends associated with nitrogen management. As a result, the Central Valley Water Board staff is actively pursuing compliance and enforcement action to bring all Coalition members into compliance with Order requirements. Fines may be imposed on Members that do not meet this requirement in a timely manner.

If you have any questions or comments regarding the review, or need any further information, please contact Yared Kebede at (916) 464-4828.

Sincerely,

Original signed by

Sue McConnell, Chief
Irrigated Lands Regulatory Program

Original signed by

Susan Fregien, Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

Enclosures: Staff Review of East San Joaquin Water Quality Coalition 2016 AMR
AMR Review Checklist

Central Valley Regional Water Quality Control Board

TO: Susan Fregien
Senior Environmental Scientist
Monitoring and Implementation Unit
Irrigated Lands Regulatory Program

FROM: Yared Kebede
Environmental Scientist
monitoring and Implementation Unit
Irrigated Lands Regulatory Program

DATE: 19 September 2016

SUBJECT: 2016 ANNUAL REPORT REVIEW – EAST SAN JOAQUIN WATER QUALITY
COALITION

On 1 May 2016, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received the East San Joaquin Water Quality Coalition (Coalition) 2016 Annual Report. The Annual Monitoring Report and Management Plan Progress Report (MPPR) cover the monitoring results from 1 October 2014 through 30 September 2015. A brief summary of the Nitrogen Management Plan (NMP) Summary Report analysis for the 2015 crop year was included in the Annual Report. An addendum to the MPPR section of the Annual Report, i.e., 7th priority subwatershed analysis, was submitted on 1 September 2016.

Checklists derived directly from the MRP Order R5-2012-0116-R3 were used to assess whether the Coalition's monitoring and management plan activities during the period covered by the reports meet the requirements (see attached checklist).

Overall, the Annual Report complies with the terms and conditions of the MRP Order. The Coalition presents information and discusses compliance with water quality standards, summarizes management practices collected from Farm Evaluations, and conducted a thorough analysis of the Nitrogen Management Summary Report data. The Annual Report also evaluates the status of management plans for each Coalition zone and uses the collected water quality information to address the key programmatic questions.

The memorandum section numbers correspond to item numbers in the attached Annual Report Checklist.

Item 6. Monitoring Objectives and Design

The Annual Report includes a brief description of field sampling conditions during the reporting period. Water samples were not collected during 86 monitoring events (36% of sampling events) because the site condition was dry; dry sites also include shallow waterbodies where representative water samples could not be collected because the depth of the water is below 6 inches (Table 13). 28 water samples were collected from non-contiguous waterbodies (12% of

sampling events). A sediment sample could not be collected from Lateral 5 ½ @ South Blaker Rd during the March/September monitoring event due to a lack of sufficient sediment.

Item 12. QA Evaluation

Field and lab data for completeness, accuracy and precision were met for more than 90% of the samples, and all samples were analyzed within hold time. The protocol for sediment pesticide analysis was updated to improve the accuracy of MS recovery. The updated protocol will be evaluated during the next sediment monitoring event when additional sediment pesticide chemistry analysis is required.

Item 17. Summary of Nitrogen Management Plan Information

The Annual Report includes a brief summary of the Nitrogen Management Plan (NMP) Summary Report analysis for the 2015 crop year. The 2015 NMP Summary Report analysis is based on selected information from the NMP worksheet (crop type and associated acreage, nitrogen applied and ratio of total nitrogen applied to yield per acre, and production unit of yield) prepared by members with large farms (> 60 acres) in high vulnerability groundwater areas.

The Coalition conducted quality control of the NMP Summary data and followed-up with members to correct inaccurate responses, and collected missing information. The Coalition received 47% of the NMP Summary report (596 members) on-time for analysis and submittal with the Annual Report. Subsequently the Coalition obtained 54% (716 members) of the required data used in the preliminary analysis of the NMP Summary Report, submitted on 31 May 2016. The revised NMP Summary analysis submitted on 2 August 2016 was based on 89% (1,125 members) of the data submitted by growers. Staff is incorporating comments provided during the public comment period due 31 August 2016, and detailed review of the NMP Summary Report will be provided in a separate memo.

Item 18. Summary of Management Practice Information

The Coalition submitted an access database of farm management practice data collected during the 2015 crop year on a township level as required by the Order. A summary of implemented management practices and associated acreage, crops grown/acreage, location of the farm and information on active/abandoned wells is clearly presented (Pages 163-182).

The 2015 Farm Evaluation surveys were required from 3,291 members with parcels in surface and/or groundwater high vulnerability areas (3,291 members), and from 136 members in low vulnerability areas with large farms (> 60 acres) without prior survey response. The Coalition received surveys from 83% of the required members (2,877 members), representing 85% of the required acreage (579,861 acres). Overall, the returned surveys in 2015 (83%) was higher than 2013 (80%) and 2014 (72%).

Similar to the 2014 returned surveys, the Coalition took corrective actions to ensure completeness of the 2015 surveys and verified the accuracy of the acreages provided by members, contacted members by phone, and sent reminder letters and follow-up notices in order to achieve 100% compliance.

Item 20. Management Plan Progress Report Review

The Coalition reports on the status of management plan monitoring and TMDL compliance monitoring. The report also includes new management plans implemented, evaluation of management practices effectiveness, and TMDL constituents.

20.2.2 New management plans

As a result of exceedances observed during the 2015 WY, 14 new management plans were triggered, including four reinstated management plans: SC was reinstated at Highline Canal @ Hwy 99 and Highline Canal @ Lombardy, chlorpyrifos was reinstated at Highline Canal @ Hwy 99 and Prairie Flower Drain @ Crows Landing Rd. New management plans are presented in Table 61 of the Annual Report. The summary of exceedances for each constituent analyzed in the Coalition region is also given in the Executive Summary section of the Annual Report.

Item 20.3.2. TMDL Monitoring

There were no detections of chlorpyrifos or diazinon in samples collected from the San Joaquin River at the three compliance points monitored by the Coalition during the 2015 WY.

There were eight exceedances of WQTLs for chlorpyrifos during the 2015 WY tributary monitoring; six of the exceedances occurred at Prairie Flower Drain @ Crows Landing Rd from March through August (4.200 µg/L, 0.200 µg/L, 0.200 µg/L, 0.061 µg/L, 0.044 µg/L, 0.017 µg/L). The remaining exceedances occurred at Duck Slough @ Gurr Rd in July (0.19 µg/L), and at Highline Canal @ Hwy 99 in January (0.070 µg/L). Duck Slough @ Gurr Rd is under a chlorpyrifos management plan. As mentioned in section 20.2.2, chlorpyrifos management plan is reinstated at Prairie Flower Drain @ Crows Landing and Highline Canal @ Hwy 99. Results and actions related to diazinon and chlorpyrifos TMDL monitoring are discussed in depth in the San Joaquin River Chlorpyrifos and Diazinon TMDL Annual Monitoring Report.

20.5.3. Management practice effectiveness

The Coalition used the performance goals approved under the 2008 management plan to improve water quality within the sixth priority subwatersheds (Ash Slough @ Ave 21, Mustang Creek @ East Ave, and Westport Drain @ Vivian Rd). A summary of recommended and implemented management practices is documented in the MPPR section of the Annual Report (Pages 134-137).

The Coalition utilized the five measurable performance goals approved in the updated SQMP to meet the management plan program objectives in the 7th priority site subwatersheds (Howard Lateral @ Hwy 140, Levee Drain @ Carpenter Rd, and Mootz Drain downstream of Langworth Pond). A preliminary analysis of the individual meetings with the targeted growers (21) was reported as an addendum to the Annual Report; the addendum includes a complete summary of management practices implemented by growers in the 7th priority site subwatersheds (Tables 2-4). The results from follow-up surveys will be discussed during the quarterly management plan meeting.

The Coalition also includes a brief summary of the 2016 Focused Outreach reinitiated to address the recent exceedances of pesticides in the site subwatersheds that were previously addressed with a focused management plan, i.e., Dry Creek @ Wellsford Rd, Duck Slough @ Gurr Rd, Highline Canal @ Hwy 99 and Prairie Flower Drain @ Crows Landing Rd. The Coalition revised its management plan strategy in order to meet the 10-year compliance deadline requirement of the Order (approved 24 November 2015).

Item 22. Conclusion and Recommendation

The Annual Report also provides a detailed analysis of water quality conditions between 2009 and the 2015 WY (Pages 206-231), including the frequency, time (month) and magnitude of exceedances, total pounds of AI applied, pesticide use changes for constituents applied by agriculture (chlorpyrifos, diuron and copper), and acres treated. The Coalition also considered

other factors (discharge and water temperature, cow density, and depth to groundwater) for the analysis of exceedances of field parameters, bacteria and nutrients, as applicable. Overall, the spatial and temporal trend analysis indicates improvements in water quality since the Coalition started focused outreach in 2009.

Monitoring data from 2008 through the 2015 WY (Figure 40) indicates that the proportion of exceedances of field and physical parameters, nutrients and *E.coli* remained higher than exceedances of metals, pesticides and toxicity in the Coalition region. The Coalition's preliminary analysis which evaluates the sources of field parameters (DO, pH), metals (copper, molybdenum, and arsenic), nutrients (ammonia, nitrate) and the legacy pesticide DDE is under staff review.

2016 Annual Report Review Checklist

Report Name: East San Joaquin Water Quality Coalition 2016 Annual Report					Reviewer Name: Yared Kebede		
Submittal Date: 5/1/2016					Review Date: 6/1/2016		
Item No.	AMR Component Name	Review code: ✓ Item meets requirement X Incomplete item / Not included NA Not applicable	Item meets requirement	Incomplete item/ Not included	Not applicable	Page #	Comments
						(Section #)	
1	Signed Transmittal Letter						
1.1	Penalty of Perjury Statement		✓			NA	
1.2	Signature of Authorized Coalition Representative		✓			NA	
1.3	Dated		✓			NA	
1.4	Discussion of exceedances, and corrective actions taken or planned (or reference to previous correspondence)		✓			NA	
1.5	Submitted on time		✓			NA	
2	Title Page						
2.1	Report title		✓			Title page	
2.2	Date of the report		✓			Title page	
2.3	Monitoring date range covered by the report		✓			Title page	
2.4	Coalition Group name		✓			Title page	
3	Table of Contents						
3.1	List of sections/chapters, tables, figures, appendices/attachments with page numbers		✓			i-xi	
4	Executive Summary						
4.1	Summary of key results and activities		✓			1-4	
4.2	Brief summary of conclusions and recommendations		✓			3-4	The Coalition makes several recommendations for addressing any gaps in water quality protection.
5	Description of the Coalition Group Geographical Area						
5.1	General description of relevant geographic features of the Coalition area, such as location and extent of area, major landforms, land uses, vegetation types, crop types, climate patterns, key waterways, and cities		✓			6-15; Figures 2-7; Appendix VII	Land use maps for each zone are included in Figures 2-7. Each map shows location of core monitoring sites.
6	Monitoring Objectives and Design						
6.1	Brief description of monitoring objectives (references to section and page numbers in Monitoring Plan or QAPP, as appropriate)		✓			34; 37	Normal monitoring objectives stated on page 34. Management plan monitoring objectives noted on page 37.
6.2	Monitoring design aligns with Monitoring Plan, any deviations from Monitoring Plan or QAPP are described (references to section and page number in Monitoring Plan or QAPP, as appropriate)		✓			34-39	
6.2.1	Representative Monitoring: sites, parameters, schedule		✓			35 Table 5; Appendix III	Representative monitoring is conducted at the Core sites for the 2015 Water Year as outlined in the Monitoring Plan Update.
6.2.2	Special monitoring (Management Plan, TMDL, source identification): sites, parameters, schedule		✓			36-39; Appendix III	Preliminary analysis of the source identification studies for field parameters (DO, pH), metals (copper, molybdenum, arsenic), nutrients (ammonia, nitrate) and the legacy pesticide DDE submitted according to the timeline in the approved SQMP. TMDL monitoring conducted in accordance with the Basin Plan and the MRP of the Order.

2016 Annual Report Review Checklist

Item No.	AMR Component Name	Review code: ✓ Item meets requirement X Incomplete item / Not included NA Not applicable			Page # (Section #)	Comments
		Item meets requirement	Incomplete item/ Not included	Not applicable		
7	Sampling Site Descriptions and Rainfall Records for the time period covered under the AMR					
7.1	Electronic copies of photos clearly labeled with CEDEN comparable station code and date	✓			47-48	Quarterly surface water monitoring data submittal includes electronic copies of site photos with CEDEN comparable station codes and dates.
7.2	Sampling site name and description (e.g. geographic area, watershed, crop type and drainages that the site represents), or unique information about the site or surrounding area	✓			21-26; Figures 8 & 9	Table 4 lists the land use acreage of site subwatershed monitored. Descriptions of site subwatersheds in pages 21 through 26.
7.3	Rainfall records in graphic or narrative form (in inches of precipitation)	✓			27-29; Figures 10-13	A clear description of precipitation and monitoring events is provided in pages 27-29. Two storm and two sediment events sampled during the 2015 WY monitoring
8	Location Maps(s) of sampling sites, crops, and land uses					
8.1	Location maps show sampling sites/monitoring wells, crops, and land use with informative level of detail	✓			Figures 2-7; Appendix VII	All maps include sufficient level of detail.
	8.1.1 Datum identified on map (<u>must be</u> WGS 1984 or NAD 1983)	✓			Figures 2-9; Appendix VII	All maps developed using NAD 1983.
	8.1.2 Source and date of all data layers identified on map	✓			Figures 2-9; Appendix VII	All maps include required layer information.
8.2	Accompanying GIS shapefile or geodatabase of monitoring site and monitoring well information include the CEDEN comparable site code and name (surface water) and GPS coordinates (monitored sites only).	✓			17	Shapefile provided as attachment include CEDEN comparable site code name and monitoring locations. CEDEN comparable site code and name with GPS coordinates found in Table 3.
8.3	A list or table indicates: site name, ID/well number, CEDEN site code (if applicable), and GPS coordinates (latitude and longitude in decimal degrees to at least five decimal places)	✓			Table 3	Site name, station code and GPS coordinates in Table 3.
9	Tabulated Results					
9.1	Data are in tabular form, clearly organized and readily discernible	✓			Appendix III	Each sampling location, sampling date, sampling time, and type of monitoring is listed in Appendix III, Table III-1.
9.2	Previously reported exceedances match exceedances identified in the AMR	✓			87 - 116; Appendix II	Exceedances reported in the AMR match with previously communicated exceedances.
9.3	All required constituents for each site have reported results	✓			Appendix III	Table III-1 in Appendix III describes sample details.
9.4	All necessary re-sampling completed and results reported	✓			Appendix III	
10	Data Discussion to Illustrate Compliance					
10.1	Results discussed in text agree with tabulated data	✓				
10.2	Discussion illustrates compliance with the WDRs, or if a required component was not met an explanation of missing data or a reason for non-compliance is included	✓			44-46	A brief description of sampling conditions for contiguous, non-contiguous and dry sites is provided in Table 13. Monitoring events for dry and non-contiguous sites are shown in Table 14.
10.3	Results are compared to WDR requirements, water quality standards and trigger limits; toxicity results, TIE's and possible causes of toxicity are discussed	✓			76-116	Results from TIE identified non-polar organics as the cause of toxicity. One sediment sample was toxic to the <i>Hyalella</i> species; pyrethroids and chlorpyrifos were present in the sediment sample. Water quality triggers in Table 33.

2016 Annual Report Review Checklist

		Review code: ✓ Item meets requirement X Incomplete item / Not included NA Not applicable	Item meets requirement	Incomplete item/ Not included	Not applicable		
Item No.	AMR Component Name					Page # (Section #)	Comments
11	Description of sampling and analytical methods used						
11.1	Description of sampling methods used (e.g. type of collection, collection containers, sample preservation, transportation, handling, field measurements), with references to SOP's if appropriate		✓			40-43	
11.2	Description of analytical methods used		✓			42-43	Field and analytical methods used in Table 11
12	Summary of Quality Assurance Evaluation results						
12.1	Acceptance criteria for all field and laboratory QA/QC measurements identified and in agreement with most recent approved QAPP; any adjustments to acceptance criteria documented and discussed		✓			51-52	All QC results met the acceptance criteria.
12.2	Summary of accuracy (lab control spike and matrix spike recovery) and precision (RPD for field duplicate, LCS/LCSD and MS/MSD pairs) included for all constituents and tests		✓			51-58	All accuracy and precision results are summarized by constituent.
12.3	QA/QC results that did not meet acceptance criteria identified in a table or narrative description that is prepared by the Coalition (not laboratories)		✓			59-86	Criteria tabulated in various tables.
	12.3.1	Discussion of how the failed QA/QC results affect the validity of the reported data	✓			49-50	
	12.3.2	Corrective actions for QA/QC results that did not meet acceptance criteria are described, laboratory exception reports are included when samples are reanalyzed due to exceedance of the linear range	✓			58	
12.4	Both field and laboratory completeness are calculated and reported; overall Project completeness is determined		✓			49-51	
13	Flow Monitoring Method(s)						
13.1	The method used to obtain flow measurement at each monitoring site during each monitoring event is listed		✓			41	Table 10 lists site specific discharge methods.
14	Summary of Exceedance Reports submitted during the reporting period and related pesticide use information						
14.1	Summary of all Exceedance Reports submitted during the AMR period is included		✓			87-116	Exceedance tally for each site subwatershed during the 2015 WY in Table 61.
14.2	Pesticide use data for all pesticide and toxicity exceedances occurring during the AMR time period (unless under a Management Plan): all chemicals applied within the monitoring site subwatershed during the four weeks prior to the measured exceedance		✓			82-83 Appendix V	All PUR required for pesticide and toxicity exceedances are listed in Appendix V.
15	Actions Taken to Address Water Quality Exceedances						
15.1	Discussion of actions taken to address water quality exceedances during the time frame of the AMR is included		✓			117-120; Appendix VI	
15.2	Updates or additional management practices implemented		✓			130-139	Preliminary analysis of individual contacts conducted in the 7th priority site subwatershed provided as an addendum to the Annual Report.

2016 Annual Report Review Checklist

		Review code: ✓ Item meets requirement X Incomplete item / Not included NA Not applicable	Item meets requirement	Incomplete item/ Not included	Not applicable		
Item No.		AMR Component Name				Page # (Section #)	Comments
16	Evaluation of Monitoring Data		✓				
16.1		Identification of spatial trends and patterns in surface and groundwater quality	✓			210-231	Trend analysis include comparison of the frequency and magnitude of exceedances between 2009 and the 2015 WY.
	16.1.1	Incorporation of pesticide use information, as needed, to assist in data evaluation.	✓			210-224	Pesticide use information including total pounds of AI applied, pesticide use changes for constituents applied by agriculture (chlorpyrifos, diuron and copper), and acres treated.
16.2		Analyze monitoring data to determine if additional sampling locations are needed. Propose schedule for additional monitoring or source studies	✓				Source evaluation studies for field parameters, metals, nutrients and legacy pesticide DDE provided in other submittals.
17	Summary of Nitrogen Management Plan information						
17.1		Aggregate information from Nitrogen Management Plan Summary Reports to characterize the input, uptake, and loss of nitrogen fertilizer application by specific crops.	✓			22-38	The NMP Summary Report aggregated the nitrogen management information by township.
	17.1.1	Include comparison of farms with same crops, similar soil conditions and similar practices.	✓			25-38	The NMP Summary Report analysis includes comparison of farms by crop, soil and management practices.
	17.1.2	Submittal of aggregate data in an electronic format, compatible with ArcGIS, identified to at least the township level.	✓				Excel spreadsheet of the NMP Summary data is submitted with the NMP Summary Report.
17.2		Statistical summary of nitrogen consumption ratios by crop or other equivalent reporting units	✓			25-38	Nitrogen consumption ratio (A/R) or equivalent reporting (A/Y) is used in the NMP Summary Report analysis.
	17.2.1	Estimated crop nitrogen needs for different crop types and soil conditions in percentiles (10th, 25th, 50th, 75th and 90th) and any outliers.	✓			25-38	A statistical summary of A/Y ratios for different crop types and soil conditions, including the range, percentiles (10th, 25th, 50th, 75th, 90th) and outliers are identified.
17.3		Quality assessment of collected information by township.	✓			9	Coalition reviewed the accuracy of the reported data, and followed-up with members to confirm the reported results.
17.4		Description of corrective actions for deficiencies in quality of data submitted, if identified.	✓			9-10	Coalition contacted members to correct inaccurate/incomplete responses, and collected missing data.
18	Summary of Management Practice Information						
18.1		Aggregate and summarize information collected from Farm Evaluations.	✓			163-182	
	18.1.1	Include quality assessment of the collected information by township (e.g., missing data, potentially incorrect/inaccurate reporting).	✓			164	Coalition reviewed the returned surveys and contacted members to correct inaccurate/incomplete response, and collected missing data.
	18.1.2	Description of corrective actions regarding any deficiencies in data quality.	✓			164	Coalition followed-up with members to ensure accuracy/completeness of the returned surveys, and followed-up with members in order to achieve 100% compliance.
18.2		Provide individual data records used to develop summary in electronic format, compatible with ArcGIS to at least township level.	✓				An access database of individual data records (township level) used to develop a summary of the management practices is submitted with the Annual Report.
18.3		Changes in patterns of implemented management practices	✓			Table 71; various	Changes in acreage/implemented practices between the 2014 and 2015 surveys were evaluated.

2016 Annual Report Review Checklist

Item No.	Review code: ✓ Item meets requirement X Incomplete item / Not included NA Not applicable		Item meets requirement	Incomplete item/ Not included	Not applicable	Page # (Section #)	Comments
	AMR Component Name						
19	Summary of Mitigation Monitoring						
19.1		Identify measures implemented by Members or Coalition to mitigate effects of program as identified in CEQA mitigation measures			✓		There were no mitigation measures implemented during the reporting period.
19.2		Identify potential impact the mitigation measure addressed, the location of the mitigation measure (township range, section), and any steps taken to monitor the success of the measure.			✓		
20	Management Plan Progress Report						
20.1		Background	✓			140	
	20.1.1	Location map(s) and summary of management plans	✓			Various figures	
20.2		Update on exceedances	✓				
	20.2.1	Table tallying all exceedances for management plans	✓			144	
	20.2.2	List of new management plans triggered since previous report	✓			145-146; Appendix VIII	14 new management plans during the reporting period. Table 61 summarizes the exceedance tally based on monitoring during the 2015 WY.
	20.2.3	Status update on new management plans	✓			145, Appendix VIII	
20.3		Monitoring data collected during reporting period	✓			144, 146	
	20.3.1	Summary and assessment of management plan monitoring	✓			147-152	
	20.3.2	Summary and assessment of TMDL monitoring	✓			159	Examination of monitoring data for chlorpyrifos and diazinon TMDL in San Joaquin River.
20.4		Outreach, education and collaboration activities	✓				
	20.4.1	List of outreach activities and information supplied	✓			117-120; Appendix VI	
	20.4.2	List of collaborative efforts for outreach	✓			119; Table 47	Collaboration with County Agricultural Commissioners, Pest Control Advisors and Pesticide Registrants.
20.5		Summary of management practices identified/implemented	✓			147-152	
	20.5.1	Baseline data	✓			141	Summary is based on priority site subwatersheds.
	20.5.2	Degree of implemented practices	✓			149-152	Presented as percentage of acreage with newly implemented management practices in high priority subwatershed.
	20.5.3	Evaluation of management practice effectiveness	✓			147-152	
20.6		Performance Goal and Schedule Evaluation	✓			121-129	Performance goals for the six priority subwatershed is completed as scheduled. Status of the updated performance goals will be reported in the next Annual Report, and regularly discussed during quarterly meetings.
	20.6.1	Progress in meeting performance goals	✓			121-123	Performance goals for the six priority subwatershed is met.
	20.6.2	Sufficient timeframe to meet scheduled deadlines in Management Plan	✓			124-129	
20.7		Recommendations for changes to Management Plan	✓			241-242	
21	Summary of Education & Outreach Activities						
21.1		Location, dates, and reason for activities.	✓			117-120; Table 47	Details of outreach activities summarized in Table 47.
21.2		Summary of the content at each session.	✓			Table 47; Appendix VIII	
22	Summary and Recommendations						
22.1		Summary of the AMR results and conclusions	✓			241-242	
22.2		Recommendations are appropriate and adequately detailed	✓			242	