



Central Valley Regional Water Quality Control Board

5 September 2024

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CONDITIONAL APPROVAL OF WESTLANDS WATER QUALITY COALITION'S MONITORING PLAN UPDATE FOR THE 2025 WATER YEAR

Thank you for your 1 August 2024 submittal of the Westlands Water Quality Coalition's (Coalition's) Surface Water Monitoring Plan Update for the 2025 Water Year (2025 Monitoring Plan Update). Based on Central Valley Water Board staff's review, the 2025 Monitoring Plan Update includes the detailed plans for monitoring water quality constituents at all surface water monitoring sites as required in Waste Discharge Requirements General Order R5-2014-0001-08.

Based on the information in the submitted documents and the attached memorandum, I conditionally approve the Coalition's 2025 Monitoring Plan Update. The Coalition should additionally sample for the pesticides pendimethalin, trifluralin, methomyl, copper, and oxyfluorfen as indicated in Table 2 of the enclosed memorandum and required by the Pesticide Evaluation Protocol. Staff intend to hold further discussions with the Coalition regarding long-term options for the monitoring of arsenic, cadmium, lead, molybdenum, and nickel within the watersheds. Until then, the Coalition should continue sampling for these metals as discussed in the enclosed memorandum.

The enclosed memorandum provides additional details regarding staff's review of the 2025 Monitoring Plan Update. If you have any questions regarding this letter, please contact Mathew Jian at (559) 445-5567, or by email at Mathew.Jian@waterboards.ca.gov.

A handwritten signature in blue ink that reads "Christina Shupe".

For Patrick Pulupa
Executive Officer

Enclosure: Staff Review of Westlands Water Quality Coalition's Monitoring Plan Update for the 2025 Water Year

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

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Central Valley Regional Water Quality Control Board

TO: Eric Warren, PE
Senior Water Resource Control Engineer
Irrigated Lands Regulatory Program

FROM: Mathew Jian
Water Resource Control Engineer
Irrigated Lands Regulatory Program

DATE: 5 September 2024

SUBJECT: REVIEW OF WESTLANDS WATER QUALITY COALITION'S MONITORING PLAN UPDATE FOR THE 2025 WATER YEAR

On 1 August 2024, the Westlands Water Quality Coalition (Coalition) submitted a Surface Water Monitoring Plan Update for the 2025 Water Year (2025 Monitoring Plan Update) to the Central Valley Water Board in accordance with Waste Discharge Requirements General Order R5-2014-0001-08 (General Order). The update identifies the constituents and schedule for stormwater monitoring for the 2025 Water Year (1 October 2024 to 30 September 2025). This memorandum provides a summary of the submittal along with staff comments and recommendations.

2025 MONITORING PLAN UPDATE SUMMARY

Stormwater Monitoring

Stormwater monitoring will occur monthly within three watersheds at the following monitoring sites:

Table 1: Stormwater Monitoring Sites

Watershed	Site Name	Site Type
Panoche-Silver Creek	Panoche-Silver Creek at I-5 Crossing	Upstream
	Panoche-Silver Creek at Belmont Ave	Downstream
	Panoche-Silver Creek at Fairfax Ave	Secondary
Cantua Creek	Cantua Creek at Highway 33	Upstream
	Cantua Creek at San Luis Canal	Downstream
	Cantua Creek at Stanislaus Ave	Secondary
Arroyo Pasajero	Arroyo Pasajero at El Dorado Ave	Upstream
	Arroyo Pasajero at Marmon Ave	Downstream
	Arroyo Pasajero at Gale Ave	Secondary

If feasible, sampling will occur at secondary sites when there is insufficient or no flow at the associated downstream sites. Sediment sampling is scheduled to occur twice; once from 15 August through 15 October, and once from 1 March through 30 April.

Pesticide Selection Process

The constituents selected for monitoring were determined using three years of Pesticide Use Report (PUR) data (2021-2023). Pesticides that were applied within the watershed areas were filtered based on the Executive Officer List of Pesticides for Consideration (Attachment A, Pesticides Evaluation Protocol [PEP] issued by the Central Valley Water Board on 21 February 2024). If applicable, degradates of parent pesticides were added to the evaluation list. Lastly, pesticides with the same toxicant in water were grouped together. Pesticides applied within the watershed areas were excluded from monitoring based on factors including environmental fate and transport properties (e.g., high volatility), calculation of an aquatic life risk ratio of less than 50 or human health risk ratio of less than 10, previously completed management plans, and the availability of analytical methods.

The pesticides proposed for monitoring are summarized in Attachment A of the 2025 Monitoring Plan Update.

Monitoring of Metals

The PEP also applies to metals applied in agriculture (boron, copper, and zinc). Metals not applied by agriculture were evaluated using site-specific monitoring history and is triggered by any of the five criteria proposed in the 2025 Monitoring Plan Update.

The Coalition proposes to not monitor for total arsenic, total molybdenum, dissolved cadmium, dissolved lead, and dissolved nickel at any of the three watersheds based on the lack of documented exceedances of applicable Water Quality Trigger Limits (WQTLs) within the last five years (Water Year 2019 through Water Year 2023). Although the PEP process resulted in monitoring of dissolved copper at the Cantua Creek watershed, the Coalition proposes to not monitor for dissolved copper based on adequate characterization of Cantua Creek (i.e., no exceedance of the WQTL).

The metals proposed for monitoring are summarized in Attachment A of the 2025 Monitoring Plan Update.

STAFF COMMENTS AND RECOMMENDATIONS

Based on staff review of the Monitoring Plan Update, ziram can be removed from the proposed list of analytes because it is not persistent in the environment and has half-life of 0.7 days.

The following table lists additional pesticides that staff identified as requiring monitoring in the 2025 Water Year and the watershed in which they should be monitored in:

Table 2: Additional Pesticides Requiring Monitoring

Watershed	Constituent
Panoche-Silver Creek	Pendimethalin
	Trifluralin
Cantua Creek	Methomyl
	Copper
Arroyo Pasajero	Oxyfluofen

Although the Coalition proposed to not monitor for copper in the Cantua Creek watershed based on no exceedances of the WQTL within the last five years, staff recommend that copper be added to the monitoring list based on step 3.C.c. of the PEP process, in which the sampling data indicates that the level of copper is greater than 10% of the aquatic life reference value of 1.11 µg/L.

Staff do not agree that there was adequate data collected from Water Year 2019 through Water Year 2023 to justify exclusion of total arsenic, total molybdenum, dissolved cadmium, dissolved lead, and dissolved nickel. The last documented sampling event for arsenic, cadmium, lead, and nickel occurred in Water Year 2019. Molybdenum was last sampled in Water Year 2021, within the Cantua Creek and Panoche-Silver Creek watersheds. Staff recommend that the Coalition include these listed metals for monitoring in the 2025 Water Year in all three watersheds.