



## Central Valley Regional Water Quality Control Board

22 November 2024

Debra Dunn Kings River Water Quality Coalition 4886 East Jensen Avenue Fresno, CA 93725

# CONDITIONAL APPROVAL OF KINGS RIVER WATER QUALITY COALITION'S 2025 SURFACE WATER MONITORING PLAN UPDATE

Thank you for your 1 November 2024 submittal of the Kings River Water Quality Coalition's (Coalition's) 2025 Surface Water Monitoring Plan Update (2025 MPU). Based on Central Valley Water Board staff's review, the 2025 MPU includes the detailed plans for monitoring water quality constituents at designated surface water monitoring sites in accordance with the Monitoring and Reporting Program for Waste Discharge Requirements General Order R5-2013-0120-09.

I am approving the Coalition's 2025 MPU on the conditions that the Coalition 1) monitor for sediment toxicity at the Empire Weir #2 and Cross Creek monitoring sites; and 2) sample for the additional pesticides indicated in Table 3 of the enclosed memorandum at Empire Weir #2.

The enclosed memorandum provides additional details regarding staff's review of the 2025 MPU. If you have any questions regarding this letter, please contact Mathew Jian at (559) 445-5567, or by email at <a href="Mathew.Jian@waterboards.ca.gov">Mathew.Jian@waterboards.ca.gov</a>.

For Patrick Pulupa Executive Officer

Enclosure: Staff Review of Kings River Water Quality Coalition's 2025 Surface Water Monitoring Plan Update





# 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**: 22 November 2024

SUBJECT: REVIEW OF KINGS RIVER WATER QUALITY COALITION'S 2025

SURFACE WATER MONITORING PLAN UPDATE

On 1 November 2024, the Kings River Water Quality Coalition (Coalition) submitted a 2025 Surface Water Monitoring Plan Update (2025 MPU) to the Central Valley Water Board in accordance with Waste Discharge Requirements General Order R5-2013-0120-09 (General Order). The update identifies the constituents and schedule for surface water monitoring for the 2025 Calendar Year. This memorandum provides a summary of the submittal along with staff comments and recommendations.

#### 2025 SURFACE WATER MONITORING PLAN UPDATE SUMMARY

### **Surface Water Monitoring**

Surface water monitoring will occur monthly at nine surface water monitoring sites, which are classified as assessment, core, ephemeral, or special project monitoring sites in accordance with the General Order and the Coalition's Surface Water Monitoring Plan (SWMP).

Table 1: Surface Water Monitoring Sites

Monitoring Site	Monitoring Classification
Crescent Weir	Core
Cross Creek	Special Project
Empire Weir #2	Special Project
Gould Canal	Core
Jackson Avenue	Assessment
Lemoore Weir	Core
Manning Ave	Core
Stinson Weir	Assessment

MARK BRADFORD, CHAIR | PATRICK PULUPA, Esq., executive officer

Tivy Creek	Ephemeral
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## **Metals Monitoring**

The Coalition proposes to continue monitoring at assessment and ephemeral sites for all metals listed in the Monitoring and Reporting Program (MRP) of the General Order, but only for fractions which have Water Quality Objectives (WQO) provided in the Tulare Lake Basin Plan (Basin Plan). The list of proposed metal fractions to monitor is outlined in the table below, as well as in Attachment A of the 2025 MPU.

Table 2: List of proposed metal fractions to monitor

Metal	Proposed Fraction to Monitor
Arsenic	Total
Boron	Total
Cadmium	Dissolved
Copper	Dissolved
Lead	Dissolved
Molybdenum	Total
Nickel	Dissolved
Selenium	Total
Zinc	Dissolved

### **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.

Pesticides will be monitored at sites classified as assessment, special projects, and ephemeral. The pesticides proposed for monitoring are summarized in Attachment A of the 2025 MPU.

#### STAFF COMMENTS AND RECOMMENDATIONS

Staff agrees with the Coalition's proposal to continue monitoring for all listed metals but only those with fractions which have WQOs in the Basin Plan.

Based on staff review of the 2025 MPU, 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.

Table 2 of the 2025 MPU does not identify sediment toxicity as being monitored at ephemeral sites (e.g. Tivy Creek monitoring site).

Table 2 of the 2025 MPU identifies sediment toxicity as being monitored at the special project sites, but Attachment A does not. According to Section 4.2 of the Coalition's SWMP, the special project monitoring sites will follow an assessment monitoring schedule. The Coalition should monitor for sediment toxicity at the Empire Weir #2 and Cross Creek monitoring sites.

Section 3.C of the PEP identifies considerations that may be used to exclude certain pesticides from the ranking list. The section states that there must be "sufficient quantity of data to characterize the potential impact of the pesticide in the watershed at vulnerable application and runoff time periods..." The Coalition has provided rationale that chemicals have sufficient monitoring if there are 2 or more samples collected at a monitoring site in a particular month. However, staff does not find that this represents a sufficient quantity of historical data cease monitoring for any of the constituents identified for exclusion. The following table (Tabe 3) lists additional pesticides and corresponding months that staff identified as requiring monitoring at the Empire Weir #2 monitoring site:

Table 3: Additional Pesticides Identified as Requiring Monitoring at the Empire Weir #2 Monitoring Site

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Pesticide	Months	
Acetamiprid	July, August	
Bifenthrin	July, August	
Cyhalothrin, Total Lambda	July	
Carbaryl	July	
Chlorothalonil	July, August	
Clothianidin	July, August, September	
Cyfluthrin	July	
Cypermethrin	July	
Dimethoate	July, August	
Diuron	September	
Fenpropathrin	August, September	
Imidacloprid	July	
Malathion	July, August	
Permethrin	July, September	
Pyraclostrobin	July	
Pyrethrins	June, July, August	