



Central Valley Regional Water Quality Control Board

10 December 2024

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APPROVAL OF THE TULE BASIN WATER QUALITY COALITION'S REVISED SURFACE WATER MONITORING PLAN

Thank you for your 5 November 2024 submittal of the Revised Surface Water Monitoring Plan (SWMP) for the Tule Basin Water Quality Coalition, and for cooperating with staff over the past months during SWMP development. Based on Central Valley Water Board staff review, the proposed plan contains the elements specified in the Monitoring and Reporting Program for Waste Discharge Requirements General Order R5-2013-0120-09.

I am approving the proposed SWMP and expect that its implementation shall commence with the 2026 Water Year. The enclosed memorandum provides further details regarding staff's review of the submittal.

If you have any questions regarding this letter or the enclosed memorandum, please contact Christine Johnson at (559) 445-6051 or christine.johnson@waterboards.ca.gov.

For Patrick Pulupa Executive Officer

Enclosure: Staff Review of the Tule Basin Water Quality Coalition's Revised Surface Water Monitoring Plan





Central Valley Regional Water Quality Control Board

TO: Eric Warren, PE

Senior Water Resource Control Engineer

IRRIGATED LANDS REGULATORY PROGRAM

FROM: Christine Johnson

Environmental Scientist

IRRIGATED LANDS REGULATORY PROGRAM

DATE: 10 December 2024

SUBJECT: STAFF REVIEW OF THE TULE BASIN WATER QUALITY COALITION'S

REVISED SURFACE WATER MONITORING PLAN

The Tule Basin Water Quality Coalition (TBWQC, or Coalition) submitted its revised Surface Water Monitoring Plan dated 5 November 2024, as required by the Waste Discharge Requirements General Order for Growers within the Tulare Lake Basin Area that are members of a Third-Party Group, Order R5-2013-0120-09 (General Order). The Coalition initially submitted a Surface Water Monitoring Plan (SWMP) on 21 February 2024. Central Valley Water Board staff provided comments to the original SWMP in a letter dated 5 August 2024.

The Coalition is currently approved to serve as a Third-Party entity to represent owners and operators of irrigated lands located within the Tule subbasin region of the Tulare Lake Basin Area. Preparation and implementation of a SWMP is required to describe irrigated agriculture's impacts on surface water quality and determine whether existing or newly implemented management practices comply with the Surface Water Limitations of the General Order. This memorandum provides a summary of the Coalition's proposed SWMP revisions and recommendations.

SURFACE WATER MONITORING PLAN – REVISION SUMMARY

Proposed Monitoring Sites

The TBWQC's proposed surface water quality monitoring network is composed of six Core/Representative monitoring stations, two proposed Assessment monitoring stations, and one Ephemeral/Representative monitoring station. Monitoring sites are selected to examine surface water characteristics within the three watersheds and evaluate water quality trends over time.

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

Core/Representative Monitoring Sites

Core/Representative monitoring sites were selected by the Coalition to be characteristic of key crop types and distribution, land use, soils, topography, and drainage within the Coalition's boundary. The Coalition also considered gaging stations, historical flow data, previous monitoring sites, and sites that have regular and intermittent flows. The following are the six Core/Representative monitoring sites proposed in the TBWQC SWMP:

- 1. Porter Slough at Road 192 Porterville, CA
- 2. Tule River at Road 144 (North Fork) Woodville, CA
- 3. Tule River at Road 92 Tipton, CA
- 4. Deer Creek at Road 248 Terra Bella, CA
- 5. Deer Creek at Road 176 Pixley, CA
- 6. Deer Creek at Road 120 Pixley, CA

<u>Assessment Monitoring Sites</u>

During Assessment years, the seven Representative Monitoring stations are sampled for additional pesticide constituents. The TBWQC is proposing to add two additional Assessment Monitoring locations that are listed below. These locations will be representative of water quality within the monitoring area and will provide sufficient data to assess the effectiveness of the management practices implemented. The following are stations proposed to be sampled for the Core and Assessment Monitoring parameters for a period of one year upon SWMP approval, after which they may be added to the dedicated representative monitoring network.

- 1. Globe Drive at Highway 190 Springville, CA
- 2. Tule River at Plano St. Bridge Porterville, CA

Ephemeral/Representative Monitoring Sites

The SWMP establishes one ephemeral monitoring site on White River at Road 208. An ephemeral monitoring site is a stream channel which carries water only during and immediately after periods of rainfall or snow melt which can be impacted by agricultural operations. Due to ephemeral waterways being dry for extended periods of time they are to be monitored for all parameters listed in section III.B.2 of the General Order's Monitoring and Reporting Program (MRP). If the waterways are dry during the scheduled monitoring event, monitoring may occur outside of the schedule, when adequate volume is available without sacrificing sample integrity.

Monitoring Sites Not Selected

The TBWQC listed three monitoring locations that were not selected:

- 1. Tule River at Success Dam Porterville, CA: This site was not selected due to the Lower Tule Irrigation District owning the water rights at this location and the TBWQC does not have the authority or permission to conduct monitoring.
- 2. Tule River at Jaye St. Bridge Porterville, CA: This site was not selected by the Coalition due to safety hazards. The Coalition stated that rapid waterflow, unsafe banks and a high traffic area for transients makes procedures for safe collection of water samples unfeasible. Additionally, the surrounding area is limited causing the monitoring station to not be representative of irrigated agriculture.
- 3. South Fork Tule River on Success Valley Drive: From the Tule River Indian Reservation to the mouth of the Success Reservoir is privately owned and fenced off land with no observable access for Coalition technicians to consistently monitor. The TBWQC does not have the authority to monitor surface water within the Tule River Indian Reservation.

Proposed Monitoring Schedule and Analysis

Section 3.1 of the SWMP identifies the monitoring program schedule. Core monitoring sites are used to track trends in water conditions over time and proposed to be monitored monthly. Monitoring is scheduled to be conducted between the 12th and the 18th of each month but may occur outside of this window depending on site conditions. On a rotating three-year schedule, Core monitoring sites would undergo assessment monitoring to evaluate a broader list of water quality constituents. In addition, sediment toxicity monitoring would be conducted semi-annually, once between August 15th and October 15th and once between March 1st and April 30th during each year of either Core or Assessment monitoring

The SWMP states that surface water quality samples will be collected from streams where adequate height exists to fill sample bottles and whenever sufficient water is present to collect samples without sacrificing sample integrity. Samples are not collected when volume is puddled, or when stream conditions are dry. In instances where sample integrity is questionable, TBWQC representatives will rely on the recommendation of the Central Valley Water Board staff and correspondence will be documented in future monitoring reports.

In accordance with Section III.B.2 of the MRP, the Executive Officer provides the Third-Party with a list of pesticides that require monitoring in areas where they are applied and have the potential to impact water quality. The TBWQC prepares the Pesticide Monitoring Proposal for the subsequent surface water monitoring period and details pesticides that will be monitored at each of the surface water monitoring sites. The Pesticide Monitoring Proposal is submitted to the Central Valley Water Board for approval no later than 60 days prior to the beginning of the water year. The Pesticide

Evaluation Protocol for the 2025 water year is provided in Appendix B of the SWMP and was conditionally approved by the Executive officer on 10 October 2024. The TBWQC submitted a Quality Assurance Project Plan (QAPP) on March 28, 2016. A Revised QAPP was submitted to the Water Board on January 10, 2019, and was included in Appendix C of the SWMP resubmittal. The Coalition will submit a revised QAPP during the 2025 water year.

STAFF COMMENTS/RECOMMENDATIONS

Central Valley Water Board staff has reviewed the TBWQC's Revised Surface Water Monitoring Plan and finds that it contains the required elements specified by the MRP. Staff recommend Executive Officer approval of the SWMP.