

# San Joaquin County and Delta Water Quality Coalition

San Joaquin County Resource Conservation District  
3422 W. Hammer Lane, Suite A  
Stockton, California 95219  
209-472-7127 ext 125

May 20, 2013

Mr. Daniel McClure  
Senior Engineer  
California Regional Water Quality Control Board - Central Valley Region  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670

Dear Mr. McClure,

The San Joaquin County and Delta Water Quality Coalition (SJCDWQC) appreciates the opportunity to submit comments on the draft Amendments to the Basin Plan for the Control of Diazinon and Chlorpyrifos ("Draft Amendments") and the Draft Staff Report (March 2013) ("Draft Staff Report"). The SJCDWQC endorses the comments provided by the East San Joaquin Water Quality Coalition and the letter from multiple agricultural and related organizations on the Draft Amendments and Draft Staff Report. The SJCDWQC believes all of the issues covered in those letters need to be addressed by the Regional Board prior to adopting a Basin Plan Amendment. In addition, the SJCDWQC is submitting comments on watersheds specifically addressed in the Draft Staff Report.

## COMMENTS ON SPECIFIC WATERSHEDS

There are water bodies that should not be listed in the Draft Amendments for a TMDL for one or more of the following reasons:

1. Improved water quality since original listing,
2. No designated beneficial use, constructed or highly modified agriculture drain that does not discharge into a downstream water body,
3. No recent use of the listed chemical (diazinon and/or chlorpyrifos).

## SJCDWQC LISTED WATER BODIES

FRENCH CAMP SLOUGH

*Listed for Diazinon*

A diazinon TMDL is not necessary for French Camp Slough due to improved water quality and water quality standards being met in 50 of 52 samples collected over seven years.

French Camp Slough was 303(d) listed for diazinon in 2010 based on exceedances in 2004. The SJCDWQC monitored for diazinon at French Camp Slough @ Airport Way for seven years from 2005 through 2012 (no sampling occurred in 2010 for diazinon at this location). Of the 52 samples collected, two samples contained concentrations of diazinon above the WQO; one exceedance occurred in 2007 and the other in 2008. Since 2008, there have been three years of monitoring with no exceedances.

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info@sjdeltawatershed.org

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The SJCDWQC was approved by the Central Valley Regional Water Quality Control Board on February 27, 2012 to remove diazinon from the SJCDWQC Management Plan for French Camp Slough as a result of improved water quality and documented management practices by growers within the subwatershed. Water quality results from the SJCDWQC monitoring program and the SJCDWQC Management Plan provide sufficient evidence to indicate that French Camp Slough is no longer impaired due to diazinon. This water body does not require its own TMDL.

MARSH CREEK (MARSH CREEK RESERVOIR TO SAN JOAQUIN RIVER; PARTLY IN DELTA WATERWAYS, WESTERN PORTION)

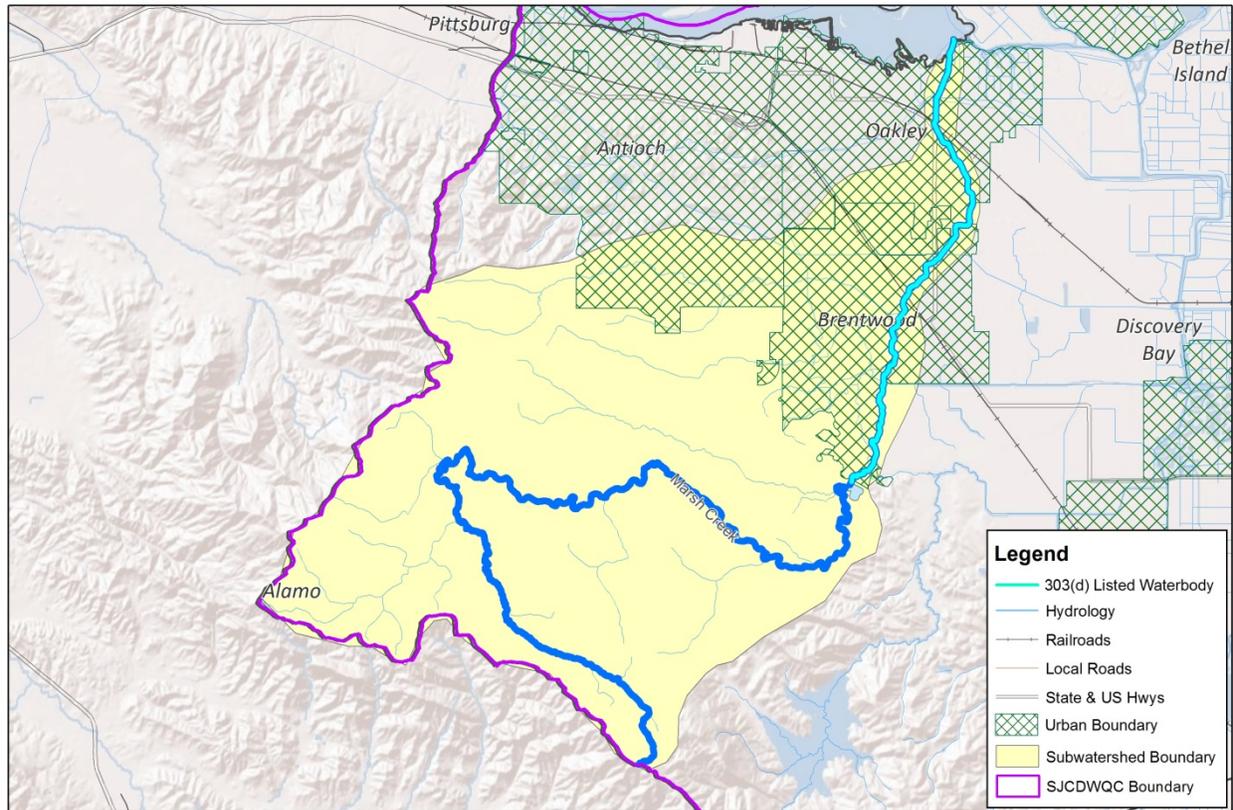
*Listed for Diazinon*

The Marsh Creek water body is listed for diazinon based on monitoring conducted at Cypress Road. The source of diazinon is listed as Agriculture | Source Unknown | Urban Runoff/Storm Sewers since a majority of the Marsh Creek watershed is urban (Figure 1). The SJCDWQC conducted monitoring at Concord Avenue, the most downstream point draining the remaining agricultural area of the watershed, from 2005 to 2007. Nineteen samples were collected and there were no exceedances of the WQO for diazinon. The SJCDWQC no longer monitors within this subwatershed because of the increase urban growth in Brentwood and along the Hwy 4 Bypass. It is recommended that agriculture be removed as a source from this water body.

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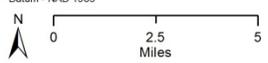
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Figure 1. Marsh Creek 303d Listed Water Body.



Source of Layers:  
Hydrology - NHD hydrodata, 1:24,000-scale, <http://nhd.usgs.gov/>  
Roads, highways, railroads, county boundary, city outlines - California Spatial Information Library.  
Urban Boundaries - 1990 TIGER data  
Basemap, Shaded Relief - ESRI  
Datum - NAD 1983

Date Prepared: 05/16/13  
SJCDWQC



## Marsh Creek

SJCDWQC\_2013

Respectfully,

Michael L. Johnson  
Technical Program Manager

3422 W. Hammer Lane, Suite A  
Stockton, California 95219

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[info@sjdeltawatershed.org](mailto:info@sjdeltawatershed.org)