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February 14, 2020

Via email to Dr. Steve Weisberg
SCCWRP

Dear Dr. Weisberg and Expert Panel Members,

I can sincerely say it was a pleasure to meet you all at the meeting in Rancho Cordova. I appreciate your efforts and engagement.

I have carefully read the Requests for Additional Information and we have a small group working on responses. I've also spoken with Dr. Weisberg and he relayed to me a concern over the integrated Stations that I believe is basic to this entire effort: How much change in monitoring sites is needed and/or are we suggesting? The short answer is, we don't know. I can offer my belief, but I don't really know.

We don't know how well the core sites align with actual discharges. I must emphasize that the agricultural order this surface water monitoring plan serves is a discharge permit, it is not an ambient monitoring program or a drinking water program. The monitoring sites must measure discharge and assess whether water quality standards and protection of beneficial uses are being achieved. Are these sites discharge receiving waters and appropriate for a discharge permit?

We also don't know the relationship between core and represented sites. The representative of MLJ Environmental, when asked, offered that the records of exactly how the sites were chosen had been lost, to my best recollection of the answer.

I listened and have reviewed the presentation offered by Exponent Consulting and I have more questions than answers. For the adequacy of spatial density, we saw a map. But the represented sites are not routinely monitored or tested for all constituents; when a core site is triggered, let's imagine for copper, the represented sites within the zone are only checked for copper and physical parameters (i.e. temperature). So, the density of sites routinely monitored is six, the core sites only. Are six sites adequate for a three-quarter million irrigated acres?

The Exponent presentation also looked at representation of crops and the summary bullet point reads, "Core and Represented sites are representative of major crop types within the zone." Exponent also looked at pesticide use within each zone and their annual pesticide evaluation protocol (PEP) results. The summary bullet point reads, "PEP applied to Represented or Core sites results in similar monitoring priorities." In my practical experience, the type of chemical used does not necessarily cause a discharge

problem, it is how that chemical is applied, in what amount, and the irrigation practices of an individual farm.

My point is that crop type and pesticides applied are used as surrogates for the discharge relationship between core and represented sites.

I believe the range of core site discharges may not characterize the range of discharges at represented sites. But to be honest and candid, we don't know. The good news is this is easy to answer.

I would suggest that all sites within two or three zones chosen at random be tested on the same day using a complete suite of physical, chemical, and toxicity tests (all sites within a zone tested on the same day, not necessarily all three zones tested on the same day). The timing would have to be during a relevant month. Instead of using surrogates, I'm suggesting a direct test of agricultural discharge representiveness (google is telling me this is not a real word, but I trust you understand). Only then will we understand if and how much change in sites may be required.

Thank you for your consideration.

Sincerely,

Steve Shimek
Executive Director
The Otter Project and Monterey Coastkeeper