

Change Sheet for Item 14
Consideration of a Tentative Order to
Conditionally Waive Waste Discharge Requirements for Discharges from Irrigated Agricultural Lands.

Page No.	Added or Deleted Text (additions are underlined, deletions are strikethrough)	Reason for Change
14-12 and 14-16	22. "Water Quality Benchmark" means discharge prohibitions and narrative or numeric <u>surface</u> water quality objectives, Footnote 2: "Water Quality Benchmark" means discharge prohibitions and narrative or numeric <u>surface</u> water quality objectives,	To clarify that water quality benchmarks are for surface water.
14-25	4. All dischargers shall implement management practices that minimize excess nutrient application relative to crop need, including <u>a consideration of</u> crop-specific applied/removed ratios for nitrogen, <u>where available</u> , in order to protect designated beneficial uses of waters of the state within the Los Angeles Region.	To clarify that crop-specific applied/removed ratios will be considered as part of nutrient management planning. Also, to clarify that applied/removed ratios for nitrogen are not available for all types of crops.
14-30	Under Table 2: <u>*Additional time may be added to this TMDL deadline should a TMDL reconsideration revise the implementation schedule based on the results of special studies.</u>	To make the Tentative Order consistent with the change that was made to Appendix 3 in response to comments.
14-88	Under (2) Water Quality Management Plan: The first WQMP shall be included as an attachment to the Notice of Intent and shall be submitted one year from the adoption of Order No. R4-2016-XXX based on water quality monitoring data from 2007-2015 and a report of existing management practices obtained from farm evaluation plans or surveys completed by Discharger Group members as described in section 2.a.iii.	To make this portion of Appendix 3 consistent with a change that was made in response to comments to allow additional time for WQMP submittal in Los Angeles County.

14-89	b.i. Certified nutrient management plans ⁸ , including <u>a consideration of</u> crop-specific applied/removed ratios for nitrogen, <u>where available</u>	To clarify that crop-specific applied/removed ratios will be considered as part of certified nutrient management planning.
14-89	⁸ A certified nutrient management plan must be certified <u>in one of the following ways:</u> <u>a. Self-certified by the Member who attends a California Department of Food and Agriculture or other Executive Officer approved training program for nutrient plan certification</u> <u>b. Self-certified by the Member that the plan adheres to a site-specific recommendation from the Natural Resources Conservation Service (NRCS) or the University of California Cooperative Extension</u> <u>a.c.</u> Certified by a Crop Advisor certified by the American Society of Agronomy, or Technical Service Providers certified in nutrient management in California by the National Resource Conservation Service (NRCS)	To add more options for certifying nutrient management plans.
14-89	⁹ <u>Crop-specific applied/removed ratios for nitrogen have not been determined for all crops grown in Los Angeles County and will be used when they are available.</u>	To clarify that applied/removed ratios for nitrogen are not available for all types of crops.
14-91	¹⁴ -October 14, 2018 WQMP update based on water quality monitoring data from 2007-2017 and October 14, 2020 WQMP update based on water quality monitoring data from 2007-2019. ¹² <u>Final report shall include presentation of data in section 2.a. and a summary of progress under the 2016 Waiver.</u>	To make this portion of Appendix 3 consistent with a change that was made in response to comments to allow additional time for WQMP submittal in Los Angeles County.
14-93	Under Annual Monitoring Report: a. Results of toxicity tests and results of TIE, where performed	To make this portion of Appendix 3 consistent with a change that was made in response to comments that TIE testing is not necessary in Los Angeles County.

<p>14-114</p>	<p>c) Individual Discharge Monitoring Requirements – <u>For Certain Members</u></p> <p>For Discharger Group monitoring sites where TMDL-associated Water Quality Benchmarks are not attained by the deadlines in Section 2.d, Table 3, the MRP shall be revised within three months to include individual discharge monitoring for either:</p> <ol style="list-style-type: none"> <u>1. all members with</u> sites draining to the Discharger Group monitoring site and all members <u>with</u> sites in the encompassing and adjacent HUC-12 watersheds as defined in Section 2.a.i <u>shall submit individual MRPs within three months or-</u> <u>2. the Discharger Group may submit a revised group MRP within three months to include individual discharge monitoring for the affected member sites.</u> <p><u>The Discharger Group shall not be held responsible for failure of a member to submit an individual MRP if the Discharger Group elects not to submit a revised group MRP on behalf of its members.</u></p> <p>The <u>individual MRPs or</u> revised <u>group</u> MRP shall include a brief sampling and analysis plan for each member site, including:</p>	<p>To add more options for who will conduct individual discharge monitoring.</p>
<p>14-114</p>	<p>Under 4th paragraph under c)</p> <p>Dry-weather monitoring must be conducted during an irrigation event <u>of the type and length that would produce the most runoff</u> on the portion of the site draining to the monitoring point. If there is no runoff at the monitoring point, then the observation of no runoff shall be documented in the field data sheet. <u>The sampling event shall be rescheduled or the discharger shall submit a declaration that their irrigation practices produce no runoff.</u> Dry-weather sampling for toxicity and for currently applied pesticides (e.g., chlorpyrifos, diazinon, pyrethroids) must occur during the first irrigation event following pesticide application.</p>	<p>To clarify that the individual discharger dry-weather monitoring must reflect conditions when runoff is expected to occur.</p>
<p>14-118</p>	<p>b.i. Description of additional or upgraded management practices, which shall be implemented by members in the land area draining to the monitoring site (and in the HUC-12 watershed in which the monitoring site is located and any adjacent HUC-12 watersheds that do not include a monitoring site) to <u>a degree appropriate to adequately</u> address Water Quality Benchmark exceedances <u>within 10 years or according to the schedule in Table 3</u></p>	<p>To clarify that selection and implementation of management practices will consider appropriate sizing and design for attainment of water quality benchmarks.</p>

14-118	b.i Certified nutrient management plans ⁸ , including <u>a consideration of</u> crop-specific applied/removed ratios for nitrogen, <u>where available</u>	To clarify that crop-specific applied/removed ratios will be considered as part of certified nutrient management planning.
14-118	⁹ A certified nutrient management plan must be certified <u>in one of the following ways:</u> <u>a. Self-certified by the Member who attends a California Department of Food and Agriculture or other Executive Officer approved training program for nutrient plan certification</u> <u>b. Self-certified by the Member that the plan adheres to a site-specific recommendation from the Natural Resources Conservation Service (NRCS) or the University of California Cooperative Extension</u> <u>a.c. Certified</u> by a Crop Advisor certified by the American Society of Agronomy, or Technical Service Providers certified in nutrient management in California by the National Resource Conservation Service (NRCS)	To add more options for certifying nutrient management plans.
14-118	¹⁰ <u>Crop-specific applied/removed ratios for nitrogen have not been determined for all crops grown in Ventura County and will be used when they are available.</u>	To clarify that applied/removed ratios for nitrogen are not available for all types of crops.
14-119	ii. Description of TMDL-specific management practices, which shall be implemented by members in watersheds addressed by TMDLs <u>to a degree appropriate to achieve TMDL load allocations</u>	To clarify that selection and implementation of management practices will consider appropriate sizing and design for attainment of TMDL load allocations.
14-121	Under Table 3: For Discharger Group monitoring sites where a deadline in Table 3 has passed, individual-all member sites draining to the Discharger Group monitoring site and all member sites in the encompassing and adjacent HUC-12 watersheds as defined in Section 2.a.i shall be subject to discharge limitations equal to Water Quality Benchmarks from the deadline forward. until Water Quality Benchmarks are attained at the individual sites or at the Discharger Group	To add more options for who will conduct individual discharge monitoring. Also, to clarify how long individual discharge monitoring will continue.

	<p>monitoring site. Discharger Groups shall submit a revised MRPs with individual discharge monitoring <u>shall be submitted</u> according to the requirements in Section 1.c. <u>Individual discharge monitoring shall continue at affected member sites until there are two consecutive years without an exceedance of the discharge limitation.</u></p>	
14-122	<p>Monitoring and Reporting Plan Due: six months from the adoption of Order 2016-XXX, and updated, if <u>needed</u><u>chosen</u>, within three months of the submittal of the annual monitoring report</p> <p>12. Individual discharge monitoring plan, if <u>needed</u><u>chosen</u>, according to Section 1.c</p>	Changes made to reflect the changes made on page 14-114 and 14-121 to add more options for who will conduct individual discharge monitoring.
14-123	<p>Under Annual Monitoring Report:</p> <ul style="list-style-type: none"> c. Parameters monitored and frequency. Tabulated results of analyses and comparison with applicable Water Quality Benchmarks and/or discharge limitations <u>(if chosen according to section 1.c)</u> d. Data interpretation including assessment of compliance and/or noncompliance with Water Quality Benchmarks and/or discharge limitations <u>(if chosen according to section 1.c)</u> <p>d. Report on individual discharge monitoring results, if <u>applicable</u><u>chosen</u></p>	Changes made to reflect the changes made on page 14-114 and 14-121 to add more options for who will conduct individual discharge monitoring.
14-124	<p><u>Annual Monitoring Report – Individual Discharge Monitoring</u> <u>Due: Annually beginning December 15th upon commencement of individual discharge monitoring</u></p> <p><u>If necessary, Discharger Group members shall prepare the individual discharge monitoring AMR after monitoring events have been completed and it shall include a review of the results of the data collected. The individual discharge monitoring AMR shall include the same components as the Discharger Group AMP.</u></p>	Changes made to reflect the changes made on page 14-114 and 14-121 to add more options for who will conduct individual discharge monitoring.
14-145	<p>¹Water Quality Benchmarks shall be based on the surface water and groundwater basin objectives currently contained in the Water Quality Control Plan Los Angeles Region (Basin Plan) or other applicable water quality standards established for the Los Angeles Region.</p>	To clarify that water quality benchmarks are for surface water.

14-279	Under 5.3.1 The highest nitrate-nitrogen concentrations have been identified during dry weather in the San Gabriel River Watershed. and the trend line indicates an increase in values above the water quality benchmark (Figure 24). Nitrate-nitrogen concentration trend lines show a decrease in dry weather in the Dominguez Channel and Los Angeles River <u>all w</u> atersheds (Figure 24).	To correct data analysis error that was reflected in the text and in Figure 24. Figure 24 was replaced as well.
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