

## **IRRIGATED LANDS REGULATORY PROGRAM UPDATE**

### **June 2015**

This month's Irrigated Lands Regulatory Program (ILRP) report provides an update on the activities of the Central Valley Regional Water Quality Control Board (Regional Water Board) ILRP through June 2015, as provided by the Regional Water Board June 4-5, 2015 Executive Officer report. Future monthly reports alternately present the status of the Central Valley Regional Water Board ILRP for one month, and the Regional Water Board ILRPs the alternate month. Current and past ILRP program monthly reports can be found on the [State Water Board Irrigated Lands Regulatory Program](#) website.

### **STATE WATER BOARD**

On June 3, 2015, Irrigated Lands Regulatory Program (ILRP) staff participated in a conference call with California Bioresources Alliance (CBA) planning committee to plan for the CBA Annual Symposium to be held in Sacramento this fall.

On June 3, 2015, ILRP and DWQ staff met with CalRecycle and California Association of Sanitation Agencies (CASA) to discuss the State Water Resources Control Board (State Water Board) Proposed General Waste Discharge Requirements for Composting Operations (draft Compost General Order). Issues discussed related to the use of biosolids in the composting process as a feed stock, amendment, and/or additive. Also discussed was the need to clarify biosolids related language contained in the draft Compost General Order.

On June 8, 2015, ILRP staff met with the State Water Boards Training Academy to discuss development of an agricultural field training course. The course would focus on identifying agricultural related best management practices and the operation/maintenance of the practices. The intent of the training is to provide regional board ILRP staff with the same training that is provided to Resource Conservation District (RCD) and other field related agricultural agency staff to familiarize staff with field inspection protocol and field vocabulary.

On June 12, 2015, ILRP staff participated in State Water Board water quality fee stakeholder meeting. Several stakeholder groups provided comments in a panel discussion. State Water Board staff also participated in a panel discussion to explain redirect and surcharge fees. Stakeholders voiced the need for more transparency in the process.

On June 12, 2015, ILRP staff participated in a quarterly recurring conference call to update and to exchange residuals and biosolids information with the State and Regional Biosolids Coordinators and the National Biosolids Partnership (NBP) Advisory Committee and interested members.

On June 15, 2015, ILRP staff participated in a conference call with US Environmental Protection Agency (USEPA) to discuss final National Water Quality Initiative long and short term metrics document, titled the [National Water Quality Initiative NRCS/EPA Long-term and Short-term Measures of Success and the Means and Metrics to Assess Them](#) is available online.

On June 16, 2014, ILRP staff participated in a meeting with the Farm Food Safety Conservation Network (FFSCN) Steering Committee to discuss revisions to the current goals and objectives of the FFSCN including the development of face book and other social media outreach.

On June 17, 2015, ILRP staff participated in a meeting with the California Bioresources Alliance to plan for the fall annual symposium. This year's symposium will include discussion in two areas. In Session 1, a panel will present innovative approaches to attain healthy soils using multiple feed stocks (e.g. compost, biosolids, etc.) and its beneficial uses (e.g. land application, improving soil structure, and land reclamation.) and will include a link between the use of innovative practices for waste to fuel recycling that link economic, operations, and environmental benefits. Benefit of precision agriculture will also be a topic of discussion. Panelists in Session 2 will discuss the need to be cautious of environmental impacts (e.g. food safety, and water quality) that may result from mismanagement of practices and the need to be supportive and cautious of water quality impacts in a collaborative approach amongst the agencies and stakeholders. To close the first day, CalRecycle and the Water Boards will follow with updates on Compost Standards, Compost General Order update, and regulation of ADM co-digestion at POTW.

On June 19, 2015, ILRP staff participated in the ILRP Information Management Solution (ILRP IMS) Kick-off meeting. DWQ and DIT management, Regional Board ILRP subject matter experts, and a contractor presented the projects objective and goal, as well as the project schedule through May 2016.

On June 22 and June 29, 2015, ILRP staff participated in the first two Regional Board staff interviews regarding the ILRP IMS Business Process Analysis (BPA) and Feasibility Study Report (FSR). The Project Team will be interviewing all Regional Board ILRP staff except the Lahontan Regional Water Board. Regional Water Board interviews will be conducted throughout June and July 2015.

## **CENTRAL VALLEY REGION**

### **Waste Discharge Requirements (WDRs) Development:**

#### *Sacramento River Watershed WDRs*

On April 23 and 30, 2015, Central Valley Regional Water Quality Control Board (Regional Water Board) staff released proposed revisions to the Waste Discharge Requirements for Growers within the Sacramento River Watershed for public review and comment. The proposed revisions include additional time for the third-party to

submit the Comprehensive Groundwater Quality Management Plan and language providing the Coalition an opportunity to participate in a Regional Monitoring Program.

#### *Eastern San Joaquin River Watershed WDRs*

On April 17, 2015, the Regional Water Board adopted revisions to the Waste Discharge Requirements for the Eastern San Joaquin River Watershed. The following revisions were adopted: change the northern boundary of the Eastern San Joaquin River Watershed Area from the Stanislaus River Watershed to the Stanislaus River; change the submittal date for the Comprehensive Groundwater Quality Management Plan to be due 60 days after Executive Officer approval of the Groundwater Assessment Report rather than one-year after the Notice of Applicability; provide a one-year extension for certification of Nitrogen Management Plans in high vulnerability areas; clarify expectations for grower implementation of Nitrogen Management Plans; and add language to the monitoring and reporting program (MRP) providing the Coalition an opportunity to participate in the Regional Monitoring Program.

#### *Western San Joaquin River Watershed WDRs*

On April 17, 2015, the Regional Water Board adopted revisions to the Waste Discharge Requirements for the Members of the Westside San Joaquin River Watershed Area. The revisions changed the submittal date for the Comprehensive Groundwater Quality Management Plan to be due 60 days after Executive Officer approval of the Groundwater Assessment Report rather than one-year after the Notice of Applicability, and added language to the MRP providing the Coalition an opportunity to participate in the Delta Regional Monitoring Program.

#### *Grassland Bypass Project/Grassland Drainage Area WDRs*

On May 8, 2015, the Regional Water Board released the tentative draft Orders for the Grassland Bypass Project and the Grassland Drainage Area for a 45-day public comment period. Board hearing for adoption of the two Orders is scheduled for the July board meeting.

#### *San Joaquin County and Delta Area WDRs*

On April 17, 2015, the Regional Water Board adopted revisions to the Waste Discharge Requirements for Growers within the San Joaquin County and Delta Area. The following revisions were adopted: change the southern boundary of the San Joaquin County and Delta Area from sub-basin border lines to the Stanislaus River; change the submittal date for the Comprehensive Groundwater Quality Management Plan to be due 60 days after Executive Officer approval of the Groundwater Assessment Report rather than one-year after the Notice of Applicability; provide a one-year extension for certification of Nitrogen Management Plans in high vulnerability areas; and add language to the MRP providing the Coalition an opportunity to participate in the Regional Monitoring Program.

#### **Nitrogen Management Plan Template:**

On March 13, 2015, the Central Valley Water Quality Coalitions (CV Coalitions) submitted a detailed description of the Nitrogen Management Plan Technical Advisory

Work Group. The Work Group is being convened to address knowledge gaps that need to be filled to allow calculation of a nitrogen ratio in the Nitrogen Management Plans. The detailed description includes the purpose of the Work Group, the questions and issues to be addressed by the Work Group, and the list of Work Group members. The description was released for public review and no comments were received by the 24 April deadline. The Workgroup held its first meeting on April 24, 2015, which included several presentations from federal and state agencies, academia and private consultants on tools for calculating nitrogen removal from crops.

### **Sediment Erosion and Control Plan Template:**

On April 23, 2015, Regional Water Board staff met with Coalitions' representatives to discuss the status of the draft Sediment and Erosion Control Plan template revisions, and options for a training program that would allow growers to self-certify Sediment Erosion and Control Plans. The requirements and elements that should be considered in Sediment and Erosion Control Assessment Reports were also reviewed. The reports must identify areas susceptible to erosion and the discharge of sediment that could impact receiving waters. The objective of the report is to determine which Member operations are within such areas and need to develop a Sediment and Erosion Control Plan.

### **Compliance, Outreach, & Enforcement:**

#### **East San Joaquin Agricultural Parcel Inspections**

From mid-March through April 2015, Regional Water Board ILRP staff inspected 20 parcels in the East San Joaquin River Watershed. The purpose of these inspections is to determine if the parcels are commercial irrigated lands that require coverage under an Irrigated Lands General Order. Data gathered during these inspections will be used to focus and prioritize the issuance of 13260 directives to commercial irrigated lands that are not covered by the applicable Irrigated Lands General Order.

#### **Sacramento Valley Agricultural Parcel Inspections**

From mid-March through April 2015, Regional Water Board ILRP staff inspected 63 parcels in the Sacramento Valley Watershed. The purpose of these inspections is to determine if the parcels are commercial irrigated lands that require coverage under an Irrigated Lands General Order. Data gathered during these inspections will be used to focus and prioritize the issuance of 13260 directives to commercial irrigated lands that are not covered by the applicable Irrigated Lands General Order.

#### **San Joaquin County & Delta Agricultural Parcel Inspections**

From mid-March through April 2015, Regional Water Board ILRP staff inspected about 300 parcels in the San Joaquin County & Delta Water Quality Coalition area. The purpose of these inspections is to determine if the parcels are commercial irrigated lands that require coverage under an Irrigated Lands General Order. Data gathered during these inspections will be used to focus and prioritize the issuance of 13260 directives to commercial irrigated lands that are not covered by the applicable Irrigated Lands General Order.

### West San Joaquin Agricultural Parcel Inspections

From mid-March through April 2015, Regional Water Board ILRP staff inspected 23 parcels in the Westside San Joaquin River Watershed Coalition area. The purpose of these inspections is to determine if the parcels are commercial irrigated lands that require coverage under an Irrigated Lands General Order. Data gathered during these inspections will be used to focus and prioritize the issuance of 13260 directives to commercial irrigated lands that are not covered by the applicable Irrigated Lands General Order.

### Tulare Lake Basin Agricultural Parcel Inspections

In March and April 2015, Regional Water Board ILRP staff inspected 319 parcels in the Kings River Watershed Coalition Authority area, 50 parcels in the Tule Basin Water Quality Coalition area and 9 parcels in the Westlands Water Quality Coalition Area. Information gathered during the inspections was used to determine which parcels require coverage under the applicable Tulare Lake Basin General Order.

### Sacramento Valley Water Code Section 13260 Directives

In April 2015, Regional Water Board ILRP staff issued 41 Directives to growers in the Sacramento Valley. These directives were sent based on Regional Water Board ILRP staff inspections that confirmed the presence of irrigated agricultural operations. The recipients are required to submit a Notice of Intent (NOI) obtain either group or individual regulatory coverage within 15 days of receipt of the Directive.

### San Joaquin County & Delta Code Section 13260 Directives

In April 2015, Regional Water Board ILRP staff issued 35 Directives to growers in the San Joaquin County & Delta Coalition area. These directives were sent based on staff inspections that confirmed the presence of irrigated agricultural operations. The recipients are required to submit a Notice of Intent (NOI) obtain either group or individual regulatory coverage within 15 days of receipt of the Directive.

### Tulare Lake Basin Water Code section 13260 Directives

In March and April 2015, Regional Water Board ILRP staff issued 190 Directives to growers in the Kings River Water Quality Coalition, 22 Directives to growers in the Tule Basin Water Quality Coalition area, and 5 Directives to growers in the Westlands Water Quality Coalition area. These directives were sent based on staff inspections which confirmed the presence of irrigated agricultural operations. The recipients are required to submit a Notice of Intent (NOI) obtain either group or individual regulatory coverage within 15 days of receipt of the Directive.

### West San Joaquin Water Code Section 13260 Directives

In May 2015, Regional Water Board ILRP staff issued 18 Directives to growers in the Western San Joaquin River Watershed. These directives were sent based on staff inspections that confirmed the presence of irrigated agricultural operations. The recipients are required to submit a Notice of Intent (NOI) obtain either group or individual regulatory coverage within 15 days of receipt of the Directive.

*East San Joaquin Notices of Violation for Failure to respond to a Water Code section 13260 Directive*

In April 2015, Regional Water Board ILRP staff mailed 39 Notices of Violation (NOVs) to landowners who failed to respond to a 13260 Directive. These owners of commercial irrigated lands (as determined by staff inspection) were previously mailed directives that required the recipients to submit proof of coalition membership or a Notice of Intent to get regulatory coverage. The NOVs give the recipients 15 days to respond or face administrative civil liability.

*Tulare Lake Basin Notices of Violation for Failure to respond to a Water Code section 13260 Directive*

In March and April 2015, Regional Water Board ILRP staff mailed 90 Notices of Violation (NOVs) to landowners who failed to respond to a 13260 Directive. These owners of commercial irrigated lands (as determined by staff inspection) were previously mailed directives that required the recipients to submit proof of coalition membership or a Notice of Intent to get regulatory coverage. The NOVs require the recipients to respond within 15 days or face administrative civil liability.

**Coalitions:**

*California Rice Commission Coalition (CRC)*

On April 10, 2015, a Regional Water Board ILRP staff review memo for the 2014 Annual Monitoring Report (AMR) was provided to the CRC. All required components of the AMR were present and deemed adequately addressed. Staff requested a special study for dissolved oxygen management plans at two monitoring sites.

On April 10, 2015, the Executive Officer approved the CRC's recommended Rice Pesticides Program Management Practices for 2015. Additional actions will be taken to address exceedances of the thiobencarb performance goal during the 2013 and 2014 growing seasons. In addition to continuing with all currently approved management practices, the CRC will support County Agricultural Commissioners (CACs) if actions are taken against individuals for repeated non-compliance with discharge requirements, increase outreach in counties where violations occur, maintain contact with applicators and pesticide crop advisors, and increase funding for off-hours surveillance inspections. The CRC will also support CACs revoking thiobencarb permits for multiple, intentional violations and support the Water Board's authority to revoke coverage under the prohibition of discharge. The CRC will provide an update on the effectiveness of practices at the October RPP stakeholders meeting.

On April 18, 2015, the CRC submitted a draft Quality Assurance Project Plan (QAPP) for Regional Water Board ILRP staff review. The draft QAPP incorporates the new reporting and monitoring required by WDR Order R5-2014-0032. The draft QAPP also covers the quality assurance/quality control measures for the Rice Pesticides Program under Resolution No. R5- 2010-9001.

*Sacramento Valley Water Quality Coalition (SVWQC)*

On April 6, 2015, Northern California Water Association (NCWA) submitted

supplemental information in order to satisfy requirements, not previously documented, to serve as a third-party under General Order R5-2014-0030. NCWA delineated roles and responsibilities carried out by subsidiary groups, including the governance structure. Methods were identified to make annual summaries of expenditures of fees and revenues readily available to Members. Based on NCWA's application and supplemental information submitted, Regional Water Board ILRP staff recommended a Notice of Applicability be issued to NCWA to serve as a third-party. On April 15, 2015, Sacramento Valley Water Quality Coalition (SVWQC) submitted a request to complete North Canyon and Coon Hollow Legacy Pesticide Management Plans. Regional Water Board ILRP staff is in the process of reviewing the request.

On April 21, 2015, the Executive Officer approved SVWQC's request for an extension to submit Monitoring and Reporting Program Report Component 20 of the first Annual Monitoring Report (AMR). Report Component 20 is a summary of Management Practice information collected as part of Farm Evaluation Surveys. The deadline for Report Component 20 was extended to August 1, 2015, but the May 1, 2015 deadline to submit all other components of the AMR remained unchanged.

On May 4, 2015, Regional Water Board ILRP staff completed review of SVWQC's addendum to its Monitoring Plan Update for the 2015 monitoring year (October 2014 – September 2015). The addendum provides the assessment monitoring plan for the Goose Lake subwatershed which was not specified previously in the monitoring update for 2015.

#### *East San Joaquin Water Quality Coalition (ESJWQC)*

On April 22, 2015, Regional Water Board ILRP staff held the 23rd quarterly meeting with the East San Joaquin Water Quality Coalition (Coalition) to discuss progress of implementing the Coalition's Management Plan, performance goals and status of other activities in progress. The Coalition provided an update on the monitoring results and outreach in the subwatersheds that have active management plans.

On May 1, 2015, Regional Water Board ILRP staff received the 2014 Annual Monitoring Report for the San Joaquin Chlorpyrifos and Diazinon Total Maximum Daily Load (TMDL) Compliance Monitoring prepared jointly by the East San Joaquin Water Quality Coalition and the Westside San Joaquin River Watershed Coalition. Regional Water Board ILRP staff is reviewing the report and preparing comments.

On May 1, 2015, Regional Water Board ILRP staff received the East San Joaquin Water Quality Coalition 2015 Annual Report for the monitoring program from October 2013 through September 2014. Regional Water Board ILRP staff is reviewing the report and preparing comments.

#### *San Joaquin County and Delta Water Quality Coalition (SJCDWQC)*

On March 23, 2015, Regional Water Board ILRP staff and the SJCDWQC Coalition held a meeting discussing the draft Groundwater Assessment Report (GAR). Regional Water Board ILRP staff determined that the draft GAR will need further evaluation of

disadvantaged communities and further explanation of why certain areas were not included. On April 10, 2015, the San Joaquin County and Delta Water Quality Coalition provided results of a high vulnerability areas (HVA) reevaluation for Regional Water Board ILRP staff feedback.

On April 2, 2015, Regional Water Board ILRP staff held a meeting with Delta Water Master concerning elevated electrical conductivity results in Sugar Cut from the prior month. DWR requested that the Delta Water Master follow-up with the Central Valley Water Board. Regional Water Board ILRP staff has informed the Coalition of the elevated EC readings. The Compliance and Outreach unit will be investigating.

On April 13, 2015, Regional Water Board ILRP staff attended the regular San Joaquin County and Delta Water Quality Coalition Steering Committee meeting. The meeting agenda included items concerning the Coalition's budget, membership status, GAR, Nitrogen Management Plans, Sediment and Erosion Control Plans, and Coalition monitoring program status.

On April 17, 2015, the Regional Water Board adopted revisions to the Waste Discharge Requirements for the San Joaquin County and Delta area. The revisions include: a deadline change for the Comprehensive Groundwater Quality Management Plan to be due 60 days after Executive Officer approval of the Groundwater Assessment Report, a one-year deadline extension for certifying the Nitrogen Management Plan, San Joaquin County and Delta Area southern boundary modification, and language revisions to the MRP providing the Coalition an opportunity to participate in the Regional Monitoring Program.

On April 24, 2015, Regional Water Board ILRP staff received the San Joaquin County and Delta Water Quality Coalition's sediment discharge and assessment report by the deadline, as part of the Order requirements. Regional Water Board ILRP staff will review the report and provide comments.

On April 24, 2015, Regional Water Board ILRP staff received the San Joaquin County and Delta Water Quality Coalition's Groundwater Assessment Report by the deadline, as part of the Order deliverable requirements. Regional Water Board ILRP staff will provide comments by the end of June. The GAR is the basis for determining HVA and establishing management plan priorities.

#### *Westside San Joaquin River Watershed Coalition (WSJRWC)*

On March 23, 2015, Regional Water Board ILRP staff held a meeting with WSJRWC to discuss requirements for preparation of the Monitoring Plan Update. The Coalition submitted a revised Monitoring Plan Update for the period of March 2015 through February 2017, which is under staff review.

On April 9, 2015, Regional Water Board ILRP staff held the quarterly management plan meeting with the Coalition representatives. Regional Water Board ILRP staff provided the past quarter's update. The Coalition representatives provided an update



on the various focus plans, follow-up regarding the Chlorpyrifos exceedances, and briefed Regional Water Board ILRP staff on upcoming reports and other grower outreach progress.

On April 30, 2015, Regional Water Board ILRP staff visited the WSJRW's Ingram Creek Drainage area to investigate the chlorpyrifos exceedances that occurred during the recent monitoring. Regional Water Board ILRP staff observed drainage patterns within the Ingram Creek Drainage area in order to delineate the actual chlorpyrifos application areas that might have caused the exceedances of the Water Quality Objectives.

On May 1, 2015, Regional Water Board ILRP staff received the 2014 water year Annual Monitoring Report for the San Joaquin River Chlorpyrifos and Diazinon TMDL Compliance Monitoring prepared jointly by the Westside San Joaquin River Watershed Coalition and East San Joaquin Water Quality Coalition. The report covers the monitoring period from October 1, 2013 through September 30, 2014. It is currently under Regional Water Board ILRP staff review.

#### *Kern River Watershed Coalition Authority*

On March 9, 2015 and March 16, 2015, Regional Water Board ILRP staff held a conference call with the Kern River Watershed Coalition Authority to discuss the GAR submitted on February 4, 2015. The Coalition was able to clarify some of the rationale used in development of the GAR, which will aid staff in reviewing the report.

#### *Westside Water Quality Coalition*

On March 17, 2015, a conference call was held with the Westside Water Quality Coalition to discuss the Groundwater Quality Assessment Report development, and methodology used in the determination of HVA.

#### **Data Management:**

Beginning in April 2015, Regional Water Board ILRP staff began preparing for ILRP water quality data global checks. The global checks discover missing data and ensure complete datasets before the data is transferred to CEDEN. This process ensures the monitoring data is robust and comparable to all ILRP data sets. This will be completed by the end of April 2015.

Beginning in May 2015, the Central Valley Regional Data Center's contract expires and will no longer be able to aid with loading ILRP data to CEDEN. Significant impacts include delayed data uploads to CEDEN. It is not yet known how long the delay will be.

Data collected prior to 2009 will continue to be available on the ILRP surface water quality data webpage until those sets have been processed and transferred to CEDEN as resources permit. Regional Water Board ILRP staff is currently processing the Westside and Sacramento Valley Coalition data collected between 2004 and 2008. Once complete, this set will complement the existing data on CEDEN providing all the data submitted by the Westside Coalition since program inception.

Data reports received in acceptable condition through April 29, 2015 are currently being processed and loaded into the Central Valley Regional Data Center (CV RDC) database replica.

Regional Water Board ILRP staff received United States Bureau of Reclamation (USBR) Grassland Bypass Project monitoring data for 2013 and 2014. These data are new for the ILRP to process and will require a significant amount of time to load the CV RDS lookup codes so it can be loaded into the CV RDC replica.

**Pesticide Evaluation Advisory Workgroup:**

The Waste Discharge Requirements for irrigated lands include requirements to monitor pesticides in surface water, which are to be identified as part of a process developed by Regional Water Board staff with input from qualified scientists and in coordination with the California Department of Pesticide Regulation (DPR). A Pesticide Evaluation Advisory Workgroup (Workgroup) was formed in June 2014, and six meetings were held in 2014 and early 2015. Regional Water Board staff drafted the initial Pesticide Evaluation Protocol based largely on the products and discussions of the Workgroup. The draft document was reviewed by the Workgroup members, and Regional Water Board staff is revising the protocol based on the comments received. The final process will be issued by the Executive Officer.