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MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## Los Angeles Regional Water Quality Control Board

December 22, 2017

### VIA E-MAIL

Ms. Jeanine Townsend  
Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24<sup>th</sup> Floor  
P.O. Box 100  
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commentletters@waterboards.ca.gov



### COMMENTS TO A-2239(a)-(c)

Dear Ms. Townsend:

Thank you for the opportunity to comment on the second staff-proposed order and the modified Eastern San Joaquin Agricultural General WDRs. The Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) has approximately 97,000 acres of irrigated agriculture within its region, located primarily in Ventura County and consisting of small farms with a median size of 15 acres. The Los Angeles Water Board has adopted sixteen TMDLs addressing water quality impairments due in part to irrigated agricultural discharges. Given its unique agricultural setting and water quality challenges, the Los Angeles Water Board has the following comments on the second staff-proposed order and the modified General WDRs:

1. The first staff-proposed order directed the Central Valley Water Board to revise the Surface Water Monitoring provisions of the General WDRs, while the second staff-proposed order directs staff from the Office of Information Management and Analysis to convene a panel of experts to make surface water monitoring recommendations that will inform irrigated lands programs statewide (second staff-proposed order at p. 51). The Los Angeles Water Board has a mature surface water monitoring program in place under its Conditional Waiver for Discharges from Irrigated Agriculture (Conditional Waiver) (Order Nos. R4-2005-0080, R4-2010-0186, R4-2015-0202, and R4-2016-0143). Under the Los Angeles Water Board's program, discharger groups must already conduct edge of field monitoring, either automatically, in the case of the Los Angeles County discharger group, or in response to static or worsening trends in pollutant concentrations at downstream receiving water sites, in the case of the Ventura County discharger group. Therefore, the Los Angeles Water Board requests that it be involved in the oversight and review of the expert panel recommendations to ensure that the recommendations do not result in reduction of its existing Conditional Waiver surface water monitoring requirements. In addition, the Los Angeles Water Board wishes to ensure that the expert panel recommendations include flexibility to reflect the local crops, irrigation practices, management practice implementation, hydrology, and significant surface water impairments in the Los Angeles Region.

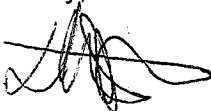
2. The requirement for all growers to have certified Irrigation and Nitrogen Management Plans in the modified General WDRs and the clarification in the second staff-proposed order that the requirements are precedential will have a significant impact on the Los Angeles Water Board's Conditional Waiver program (modified General WDRs at p. 27 and second staff-proposed order at p. 32). Currently, the Los Angeles Water Board's Conditional Waiver requires growers in sub-watersheds with surface water quality management plans for nitrogen to prepare Nitrogen Management Plans, which represents approximately half of the growers in the Los Angeles Region. Additionally, the Conditional Waiver requires all growers to implement management practices based on Applied/Removed ratios for nitrogen to protect groundwater and requires groundwater monitoring to assess long-term trends and management practice effectiveness. The Los Angeles Water Board received the first groundwater trend monitoring report in December 2017 and will receive the first management practice effectiveness report in December 2020. At that point, the Los Angeles Water Board will better understand the impacts of agriculture on groundwater in the Los Angeles Region and if management practices based on Applied/Removed ratios for nitrogen are effective. In the meantime, the Los Angeles Water Board is focusing its efforts on the critical impairments of nitrate in surface water. The Los Angeles Water Board therefore requests that the final order allow regional boards to determine when and where to require nitrogen planning and reporting based on local conditions and threats to water quality.

Additionally, the requirement that all growers have certified Irrigation and Nitrogen Management Plans would double the nitrogen planning and reporting requirements in the Los Angeles Region and thus place an additional burden on Los Angeles Water Board staff to approve templates, facilitate training, process individual member exemption requests, and oversee third party follow up on outliers. The Los Angeles Water Board is allocated only one PY for its Conditional Waiver program for the entire region. Furthermore, there are very few certified crop advisors located in the Los Angeles Region. Therefore, if the certified Irrigation and Nitrogen Management Plan requirement remains in the final order, the Los Angeles Water Board requests assistance from the State Board to facilitate self-certification training programs in the Los Angeles Region.

3. The second staff-proposed order (at p. 38) clarifies that the requirement for use of nitrogen removed coefficients shall be precedential statewide. It further directs third parties in the Central Valley region to publish coefficients, but allows other regional boards to rely on their own research, the research of a third party, literature values, or another regional board's coefficients to determine appropriate coefficients for their regions. By allowing several options, it is likely that the majority of the responsibility for determining nitrogen removed coefficients will fall to the resource-limited regional boards. The Los Angeles Water Board therefore requests that the final order clarify that, in all regions with third parties, the third parties shall be responsible for publishing nitrogen removed coefficients.

The Los Angeles Water Board appreciates your consideration of its comments. If you have any questions, please contact Jenny Newman at (213) 576-6691 or [jenny.newman@waterboards.ca.gov](mailto:jenny.newman@waterboards.ca.gov).

Sincerely,



Deborah Smith  
Chief Deputy Executive Officer