

IRRIGATED LANDS REGULATORY PROGRAM UPDATE

September 2015

This month's ILRP report provides an update on the activities of the North Coast, San Francisco, Central Coast, Los Angeles, Lahontan, Colorado River Basin, Santa Ana, and San Diego Regional Water Quality Control Board ILRPs through September 2015. Future monthly reports will alternately present status of the Central Valley Water Board ILRP one month, and the other 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 September 1, 2015, Irrigated Lands Regulatory Program (ILRP) staff participated in a nutrient management planning meeting at the California Department of Food and Agriculture (CDFA). Issues discussed included continuance of nutrient management plan certification training by Certified Crop Advisers (CCA) for the 2016 FY. Also discussed was the potential of adding a "train the growers" module into the curriculum.

On September 2, 2015, ILRP staff presented at a California Association of Pest Control Advisers/CCA sponsored nutrient management plan workshop. The workshop was held at the Stanislaus County Agricultural Center in Modesto.

On September 8, 2015, ILRP staff participated in a strategy setting meeting with staff from Environmental Protection Agency Region 9 (EPA) and Natural Resource Conservation Service (NRCS). The meeting was to discuss the potential of broadening the ILRP Team Concept to other agencies under the Healthy Soils Initiative platform and to resurrect the Interagency Agricultural Coordinating Team (IACT). EPA is lead in the IACT and recommended renaming to Interagency Workgroup for California Agriculture or IWCG. A multi-agency kick-off meeting is tentatively scheduled for December 2015.

On September 9 and 23, 2015, ILRP staff participated in a meeting with California Bioresources Alliance (CBA) as part of a planning committee to discuss a final agenda for the November 4-5, 2015 CBA Annual Symposium. The agenda includes first day sessions on Food Safety; Setting Standards and Factoring in Precautions regarding "Compost, Co-digestate, and Biochar". The second day will expand discussion on research on digestate and biochar.

On September 11, 2015, ILRP staff met with the Highlands Consulting Group (HCG) to discuss finalizing the ILRP IMS Phase 1 Business Analysis and the Phase 2 Business Alternatives (formerly called a Feasibility Study Report). It is anticipated that HCG will submit the final deliverables to the State Water Board by October 30, 2015.

On September 16-17, 2015, ILRP staff participated in the quarterly ILRP roundtable. The roundtable was hosted by the Central Valley Water Board ILRP staff and included an agricultural related field trip in the Dry Creek sub-watershed provided by the East San Joaquin Water Quality Coalition and other partners.

On September 21, 2015, ILRP staff participated in the final Nitrogen Management Plan Technical Advisory Work Group meeting, hosted by the East San Joaquin Water Quality Coalition. Presentation of nitrogen removed reporting options were presented and discussed along with a timeline for development of final report/recommendations to be submitted to the Central Valley Water Board.

On September 24, 2015, ILRP and Nonpoint Source staff met with NRCS staff to discuss details of rangeland composting projects being proposed by NRCS.

On September 29, 2015, ILRP staff participated in a California Roundtable for Agriculture and the Environment Annual Summit. The agenda is intended to bring together leaders and experts from across sectors to explore innovative market and governance approaches to preserving and strengthening California working lands and on the state and future of California farms, ranches, and forests.

NORTH COAST REGION

North Coast Regional Water Quality Control Board (North Coast Water Board) staff continue to develop the Agricultural Lands Discharge Program, focusing on a series of targeted permits specific to agricultural commodities or geographic areas. An update on several efforts follows.

Discharges from Marijuana Cultivation:

North Coast Water Board adopted the Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Marijuana Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region in August 2015.

Agricultural Lands Discharges in the Tule Lake Basin:

North Coast Water Board staff continue to work on the draft permit, and it is now undergoing internal review. Staff plan to bring together a Technical Advisory Group to provide input on draft Water Quality Management Plan (WQMP) requirements, which are a subset of the permit requirements. The Technical Advisory Group meeting will be scheduled for early 2016. North Coast Water Board staff will then incorporate input from the group and develop an administrative draft permit for review by the Tule Lake Basin Stakeholder Advisory Group. After incorporating their edits, staff will draft CEQA documentation and distribute the full draft permit package for public review and comment.

Easter Lily Bulb Cultivation:

In June 2015, North Coast Water Board staff completed sampling of tributaries in the Smith River Plain and at several wells to screen for the presence of agricultural pollutants and toxicity. The lab results for the groundwater sampling have recently been finalized, and staff are in the process of summarizing the results. The summaries and full reports on the 2015 groundwater results and the 2013 surface water sampling results will be available to the public by October 2015. The 2014-2015 surface water sampling results are not yet available. North Coast Water Board staff intend to bring the lily bulb cultivation discharge permit for Board after adoption of the Tule Lake agricultural lands discharge permit.

Vineyards & Orchards:

North Coast Water Board staff are coordinating with the San Francisco Bay Regional Water Quality Control Board (San Francisco Bay Water Board) on their development of a discharge permit for vineyards in the Sonoma Creek and Napa River watersheds, with the intent of being as consistent as possible between the regions. North Coast Water Board staff are also working with third-party certification programs to incorporate water quality requirements consistent with likely future permit requirements. North Coast Water Board staff will begin drafting a permit for discharges from vineyards and orchards after the adoption of the Tule Lake and Easter Lily Discharge permits discussed above.

SAN FRANCISCO BAY REGION**Vineyard WDRs Program Development:**

Progress continues with the development of an environmental impact report and draft general waste discharge requirements (WDRs) for vineyard properties located within the Napa River and Sonoma Creek watersheds. The Vineyard WDRs will implement the Napa River and Sonoma Creek sediment total maximum daily loads (TMDLs).

The Vineyard WDRs anticipate roles for third-party technical assistance providers to help producers comply with the requirements of the permit; therefore, San Francisco Regional Water Quality Control Board (San Francisco Bay Water Board) staff continues to engage with parties that have expressed an interest in filling this important function. At a minimum, third-party groups will assist producers in preparing farm plans that identify, plan, and schedule the implementation of effective management practices to achieve the performance standards identified in the WDRs.

Tentative Waiver of Waste Discharge Requirements for Existing Dairies:

On June 10, 2015, the) renewed a conditional waiver of Waste Discharge Requirements (Waiver) for existing dairies. Since June 2015, San Francisco Bay Water Board staff has worked with representatives from the Western United Dairywomen, UC Cooperative Extension, and the California Dairy Quality Assurance

Program on short-term and long-term producer outreach strategies.

Short-term outreach in August 2015 was focused on helping producers complete their notices of intent (NOI) to enroll under the Waiver. San Francisco Bay Water Board staff feel that this outreach was a success in that it contributed to a solid enrollment tally (i.e., 80 percent producer enrollment by the September 1, 2015 deadline).

Longer-term outreach, which begins in mid-November 2015, will consist of a series of workshops to help producers understand the requirements of the Waiver and to help them comply with the Waiver.

Grazing Waiver Program:

San Francisco Bay Water Board staff completed twelve grazing lands site inspections in the Tomales Bay, Napa River, and Sonoma Creek watersheds. The inspections were designed to assess enrollee compliance with conditional waivers of WDRs for rangeland grazing operations. Grazing practices observed during this inspection season were consistent. The prolonged drought has had an impact on rangelands resulting in less available forage and residual dry matter. Ranchers have generally responded by reducing herds and modifying grazing rotations.

Looking forward, the San Francisco Bay Water Board staff intend to continue conducting inspections and program outreach to increase levels of participation and annual reporting and pursue progressive enforcement as appropriate.

CENTRAL COAST REGION

ILRP Surface Water Activities at a Glance:

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff conducted workshops to help growers complete the total nitrogen applied reporting requirement. Eight workshops were held on five different dates in August with four workshops in Spanish and four in English. Central Coast Water Board staff sent flyers announcing the workshops to growers and technical service providers; over 500 emails were sent as well as USPS mailings and faxes to those without email accounts. The workshops were also announced on our website. Recall that the total nitrogen applied reports are due on October 1st of each year.

Central Coast Water Board staff are continuing the work to identify and correspond with growers who are not enrolled in the Agricultural Order. At the time of this report preparation, our efforts resulted in seven new enrollments. Central Coast Water Board staff are following up NOV's for those who received the July 2015 notice to enroll the irrigated acreage but have not yet enrolled.

ILRP Groundwater Activities at a Glance:

Individual Groundwater Monitoring and Reporting Compliance Status

From May 21, 2015, through August 3, 2015, Central Coast Water Board staff issued

380 notices of violation letters involving 517 individual ranches/farms for failure to submit individual groundwater monitoring data as required by the Agricultural Order. Central Coast Water Board staff are working with individual growers and laboratories to assist them with compliance.

Central Coast Groundwater Coalition (CCGC) - Cooperative Groundwater Monitoring and Reporting Compliance Status

The Executive Officer issued a letter to CCGC in June 2015 requiring CCGC to evaluate and confirm that all domestic drinking water wells for all CCGC members have been sampled and results reported per the CCGC workplan. On July 27, 2015, CCGC provided a response and confirmed that CCGC conducted an evaluation of the completeness of sampling of groundwater wells (including domestic drinking water wells) and did identify approximately 50 domestic drinking water wells that were not sampled. To address this under-sampling, CCGC provided a schedule to sample these domestic wells within 90 days.

On July 30, 2015, CCGC submitted the Final Southern Counties Groundwater Quality Characterization Report, which is currently pending staff review and approval.

LOS ANGELES REGION

Background on the Conditional Waiver:

The Conditional Waiver of Waste Discharge Requirements for Dischargers from Irrigated Lands adopted by Order No. R4-2010-0186 (Conditional Waiver) requires agricultural operators (dischargers) to enroll irrigated agriculture property under the waiver in order to continue discharging waste to waters of the state. Agricultural operators may enroll as an individual discharger or as a member of a discharger group. The Nursery Growers Association Los Angeles County Irrigated Lands Group (NGA-ILG) and the Ventura County Agriculture Irrigated Lands Group (VCAILG) are the two discharger groups in the Los Angeles Region that have formed to comply with the Conditional Waiver.

Enrollment and Enforcement:

On July 23, 2015, Los Angeles Regional Water Quality Control Board (Los Angeles Water Board) ILRP staff sent Pre-Prosecution letters and Notices of Violation to growers for failure to enroll in the Conditional Waiver. Los Angeles Water Board staff are currently in the process of updating the status of the violations. Los Angeles Water Board staff are in continuous communication with the representatives of the two discharger groups regarding enrollment status. In May 2015 the Los Angeles Department of Water and Power (LADWP) sent letters to their tenants to enroll in the Conditional Waiver. NGA-ILG is currently working with LADWP to enroll all LADWP tenants who operate agricultural irrigated lands.

Interagency Coordination:

On August 26, 2015, Los Angeles Water Board staff met with a representative from

NGA-ILG regarding additional information needed for a report on the current Waiver term including update on the enrollment. On September 16, 2015, Los Angeles Water Board staff participated in a roundtable for the Irrigated Lands Regulatory Program hosted by the Central Valley Water Board ILRP staff.

Conditional Waiver Renewal:

Los Angeles Water Board staff are currently working on a report for a review of the Conditional Waiver Order No. R4-2010-0186 and recommendations for waiver renewal. Los Angeles Water Board staff are evaluating annual monitoring data reported over the past seven years to assess trends in water quality as part of the Conditional Waiver renewal process. On October 8, the Los Angeles Water Board will consider a proposed Order that would extend the expiration date of Order No. R4-2010-0186 to March 10, 2016. The extension will allow Los Angeles Water Board staff additional time to complete the data review and to determine if the existing requirements contained in Order No. R4-2010-0186 should be modified or if additional requirements are needed. As part of this process, Los Angeles Water Board staff are planning more meetings with environmental organizations, dischargers groups, and other stakeholders to discuss the proposed changes.

Irrigated Lands Program Region 4 Database:

Los Angeles Water Board staff have added water quality monitoring and BMPs survey data to our GIS geodatabase. Regional Board staff are analyzing data using both GIS and excel to assess the water quality improvements. Los Angeles Water Board staff continues to update the Irrigated Lands Program geodatabase including enrollment and enforcement for both Ventura and Los Angeles Counties.

Grant Management:

The Clean Water Act section 319(h) grant to identify the contribution of and reduce metal loadings from nurseries in the San Gabriel River Watershed (Grant Agreement No. 11-098-554) has been closed.

LAHONTAN REGION

The Lahontan Regional Water Quality Control Board (Lahontan Water Board) staff allocated staff efforts during the August/September 2015 reporting period on administrative tasks supporting the Irrigated Lands Regulatory Program.

Lahontan Water Board staff prepared and submitted to State Water Board staff revised estimates of irrigated land acreage in the region.

Lahontan Water Board staff attended the September ILRP Round Table meeting in Sacramento and Modesto areas.

Lahontan Water Board staff also spent significant time working on contaminated groundwater issues associated with irrigated agricultural areas and irrigated land

areas associated with dairies.

Lahontan Water Board staff are drafting a general order that will be issued to all confined animal facilities. The general order will address, among other things, over application of manure and wash water to irrigated lands. Developing the order is anticipated to take several months and involve significant stakeholder involvement.

COLORADO RIVER BASIN REGION

Colorado River Basin Water Quality Control Board (Colorado River Basin Water Board) staff continues to implement four Conditional Waivers of Waste Discharge Requirements for agricultural discharges. Most agricultural areas (99.7%) in the region are regulated by Conditional Waivers.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural wastewater discharges within the Palo Verde Valley in Riverside and Imperial Counties (Board Order R7-2012-0047) on September 20, 2012. This Conditional Waiver affects over 130,000 acres in eastern Riverside County and northeastern Imperial County. The responsible parties include individual farmers, and the Palo Verde Irrigation District (PVID). Implementation has begun with PVID forming the Palo Verde Outfall Coalition (PVOC), a group that represents landowners and farmers regulated by the Conditional Waiver. According to the PVOC group, membership is at over 99%. The PVOC group's water quality monitoring program began in November 2013. The PVOC group continues with the Group Compliance Program, and to submit reports of water quality sample results.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural wastewater discharges originating within the Bard Unit of Reservation Division (Board Order R7- 2013-0002) on January 17, 2013. This Conditional Waiver affects approximately 6,688 acres of farmland along the Colorado River near Yuma, Arizona. The responsible parties include individual farmers, and the Bard Water District (BWD). Implementation has begun with BWD forming the Bard Unit Coalition Group (BUCG), a nonprofit organization that represents landowners and farmers regulated by the Conditional Waiver. According to the BUCG group, membership is at over 99%. The BUCG water quality monitoring program began in June 2015.

On June 27, 2015 a revised Monitoring and Reporting Program Plan (MRP) was submitted by BUCG to Colorado River Basin Water Board staff. It was approved by our Executive Officer on July 24, 2015.

On August 12, 2015 BUCG submitted a water quality monitoring program sampling report for June 2015 to Colorado River Basin Water Board staff who are reviewing the report.

On August 28, 2015 BUCG submitted the Water Quality Management Plans

(WQMPs) of their coalition group members to Colorado River Basin Water Board staff who are reviewing the WQMPs.

On September 4, 2015 BUCG submitted a water quality monitoring program sampling report for July 2015 to Colorado River Basin Water Board staff who are reviewing the report.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural dischargers in the Coachella Valley (Order No. R7-2014-0046) on June 26, 2014. A Monitoring and Reporting Program Plan was adopted with the Conditional Waiver. This Conditional Waiver affects about 60,000 acres of farmland in central Riverside County. The responsible parties include individual farmers, the Coachella Valley Water District (CVWD) and the Coachella Valley Irrigated Lands Coalition (CVILC). Implementation has begun. The CVILC, a nonprofit organization, has partnered with CVWD to represent landowners and farmers regulated by the Conditional Waiver. The CVILC began implementing their Compliance Program in April 2015.

They are currently accepting membership. The next step will be for the CVILC to submit their coalition member information.

On April 30, 2015 the CVILC submitted a draft Quality Assurance Project Plan. Colorado River Basin staff have reviewed the draft QAPP and sent review recommendations to CVILC. Colorado River Basin Water Board staff and CVILC continue to discuss revisions to the QAPP. Once the QAPP is approved by our Executive Officer, the next step will be for the CVILC to begin monitoring.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural dischargers in the Imperial Valley (Order No. R7-2015-0008) on January 15, 2015. This Conditional Waiver affects over 450,000 acres of irrigated lands in the Imperial Valley near the International Boundary with Mexico. The interested parties include individual farmers, the Imperial Irrigation District (IID) and Imperial County Farm Bureau (ICFB). Implementation has begun with IID and ICFB forming a joint Coalition Group (IID-ICFB CG) to represent landowners and farmers regulated by the Conditional Waiver.

On June 24, 2015, the ICFB submitted a Request for Deadline Extensions for the Conditional Waiver. Colorado River Basin Water Board staff are reviewing the Request.

On July 15, 2015 the ICFB submitted a draft Compliance Program Plan. Colorado River Basin Water Board staff has reviewed the draft CPP, and on September 22, 2015. Colorado River Basin Water Board staff sent review recommendations to ICFB. Colorado River Basin Water Board staff and ICFB will continue to discuss revisions to draft CPP. Once the CPP is approved by our Executive Officer, the next step will be for the IID-ICFB CG to begin accepting membership.

SANTA ANA REGION

The Santa Ana Regional Water Quality Control Board (Santa Ana Water Board) ILRP staff are expecting comments from the Conditional Waiver of Waste Discharge Requirements for Agricultural Discharges (CWAD) advisory committee on suggested changes to the waiver. Current timeline for adoption is December 2015.

SAN DIEGO REGION

The San Diego Regional Water Quality Control Board (San Diego Water Board) ILRP staff are developing Tentative General Waste Discharge Requirements for Discharges from Commercial Agricultural and Nursery Operations within the San Diego Region (Tentative Order) and associated draft California Environmental Quality Act (CEQA) documentation. It is anticipated that the Tentative Order and draft CEQA documentations will be considered for adoption by the San Diego Water Board in 2015.

Status of Development of the Agricultural Order:

An Administrative Draft of the Tentative Order was released on July 3, 2015. The comment period for the Administrative Draft of the Tentative Order ended on July 31, 2015. San Diego Water Board will consider the comments received prior to releasing the Draft Tentative Order for formal public comment later this year.

Stakeholder/Public Outreach:

Public workshops were held on July 14, July 15, August 18, September 10, September 15, and September 17, 2015 to provide the public an opportunity to discuss and to comment on the development of the Tentative Order. Stakeholders who attended included growers and representatives from California Native American Tribes, irrigated lands groups, water districts, local municipalities, the County of San Diego, the National Resource Conservation Survey, and the University of California Cooperative Extension.

Some of the public workshops were facilitated by Dr. Dorian Fougères of the California State University Sacramento's Center for Collaborative Policy. Invited speakers included Henry Abarbanel, San Diego Water Board Chair; Gary Strawn, San Diego Water Board Member; David Gibson, San Diego Water Board Executive Officer; Jimmy Smith, San Diego Water Board Assistant Executive Officer; Johnny Gonzales, Program Coordinator for the State Water Board's Irrigated Lands Regulatory Program; and Dr. Raphael Mazor of the Southern California Coastal Water Research Project and Coordinator for the Southern California Monitoring Coalition.

Public comments from these public workshops will be considered prior to releasing the Draft Tentative Order for formal public comment later this year.