

WATERSHED COALITION

INFORMATION FOR CENTRAL VALLEY AGRICULTURE

News

WINTER 2014



IN THIS ISSUE

Expert Panel Releases Recommendations

Growers Fined for Ignoring Program

Legal Challenges Against WDR Proceed

Creek Monitoring to Focus on New Pesticides



All Central Valley Agriculture Under New WDRs

With the approval on March 12, 2014 of Waste Discharge Requirements (WDR) for the Sacramento Valley Water Quality Coalition, all 7 million acres of irrigated crop land in the Central Valley is under the same requirements to protect surface and groundwater from potential impacts by farm inputs or practices. While there are hundreds, possibly thousands of growers who have not sought coverage either as an individual or through the coalition option, the 13 coalitions now operating in the vast region can claim more than 25,000 growers as members. Fewer than 10 growers have chosen to pursue an individual WDR.

After WDR approval, each existing coalition needed to apply to the Regional Water Board to represent growers in their respective regions. The regulations adopted to date have requirements for growers in the Central Valley to complete farm evaluations, nitrogen management plans and sediment and erosion control plans. Each group is under different timelines to gather information and prepare reports for the Central Valley Regional Water Quality Control Board (Regional Water Board).

All Central Valley Coalitions also must develop a Groundwater Assessment Report (GAR). This document is a compilation of regional groundwater information including depth to groundwater and known nitrate and

pesticide levels in wells. All data comes from existing sources.

A requirement for the GAR is to propose areas to be designated as low or high vulnerability to water contamination. The vulnerability rankings describe the potential risk of discharges of sediment or farm inputs (fertilizers or pesticides) to either surface water or groundwater. Determining threat to groundwater may be done using several approaches covering numerous constituents. A high vulnerability designation is given if there is enough data to indicate that irrigated agriculture is causing or contributing to a water quality problem. An example of high vulnerability is an area with high nitrates in groundwater and/or sandy soil with shallow depth to water. These lands require having a nitrogen management plan certified by a qualified individual (Certified Crop Advisor or professional agronomist). If an area is designated high vulnerability for surface water contamination, growers will need to complete a sediment and erosion control plan and participate in regional water quality management plans.

Before approving a GAR, the Regional Water Board seeks comments from growers, coalition representatives and the public as it develops its recommended approach.

Legal Challenges Proceeding Against ESJWQC WDR

Legal challenges to the first Waste Discharge Requirements (WDR) adopted in the Central Valley may move forward as early as January 2015. In August 2014, the State Water Board stopped the clock on petitions previously filed against the WDR for the East San Joaquin Water Quality Coalition by adopting an order granting its own motion review. Since then, State Water Board staff have been reviewing the WDR, and challenges to the WDR. In general, the WDR was challenged on grounds that it violated state policies, including the State's Anti-degradation Policy and its Nonpoint Source Pollution Policy.

It is anticipated that a Draft Order will be released early in 2015. When the State Water Board reviews a WDR, it has the option of revising the WDR and its requirements in whole or in part. Or, the State Water Board can remand the WDR back to the Regional Water Board with specific direction. Orders issued and adopted by the State Water Board can be precedential, so an Order on the East San Joaquin's WDR can impact and influence the petitions pending on the other irrigated agricultural WDRs, which were challenged on similar grounds. Of the seven coalition WDRs adopted by the Regional Water Board, five were challenged and appealed to the State Water Board.

Published by

Coalition for Urban Rural Environmental Stewardship

www.curesworks.org

with support from

Almond Board of California

www.almondboard.com



Editor: Parry Klassen

pklassen@unwiredbb.com

Expert Panel Releases Recommendations

An assembly of 8 scientists, growers and agronomists weighed in on issues that are top of mind with state water regulators: how should fertilizer use in irrigated agriculture be reported and what should regulators do with that information? The Expert Panel was formed by order of the State Water Resources Control Board in its report to the legislature in 2013. A series of questions related to nitrates in groundwater were taken up by the Panel during summer 2014 with answers detailed in a final report submitted to the State Water Board on September 23, 2014.

In its 75-page final report, the Expert Panel recommends a shift in regulatory program emphasis, including adopting a long-term groundwater monitoring strategy, setting up a science-based approach to evaluating and controlling nitrate sources and expanding education to all agricultural audiences.

Among the panel's final recommendations to the State Water Board, which will in turn prepare policy based on the information, include:

- Establish coalitions to serve as intermediaries between farmers and regional water boards.
- Adopt a "nitrogen applied/retained ratio" to determine source control for nitrate percolation into groundwater, rather than a "pounds applied" calculation.

- Develop a strong, comprehensive and sustained education and outreach program.
- Require creation and implementation of detailed nitrogen/water management plans.
- Require detailed reporting by farms to their coalitions.
- Provide multi-year tracking to document water quality improvement trends.
- Continue targeted research to help farmers maintain or improve yields while simultaneously decreasing movement of nitrates into groundwater on individual fields.
- Provide the agricultural community with regular reports on water quality improvement progress to help sharpen improvement efforts.

While the State Board considers the recommendations this winter, Central Valley water quality coalitions will begin implementing their WDRs which in part encompass nitrogen management approaches not supported by the expert panel report. How the State Board will harmonize those differences has not yet been decided.

The final report is online at www.swrcb.ca.gov/water_issues/programs/agriculture/docs/ILRP_expert_panel_final_report.pdf.

Growers Fined for Ignoring Program

The Regional Water Board issued its first round of Administrative Civil Liability (ACL) fines in May, proposing penalties ranging from \$2240 to \$8600 against growers for failure to obtain regulatory coverage for discharges from their irrigated cropland in the Central Valley. At press time, two of the four growers named in the ACLs had settled by paying the fines. But in an unprecedented step, the Regional Board rejected the settlement payments and is requiring growers to appear in front of the Regional Water Board for a hearing.

Meanwhile, 13 pre-ACL letters have been mailed to growers in the East San Joaquin Water Quality Coalition region. These letters inform growers that if action is not taken promptly to join a coalition or initiate an individual permit, an ACL fine will be levied. ☹️

Creek Monitoring to Focus on New Pesticides

The downward trend in detections of pesticides in surface waters by Central Valley water quality coalitions continued in 2014. While less water in creeks and rivers may be contributing to some of the decreases, outreach by the coalitions and growers changing practices has begun paying off. Unlike the period of 2005-2009 when several coalitions were regularly finding multiple pesticides, particularly organophosphates (OPs) such as diazinon and chlorpyrifos, total exceedances of state standards for the insecticides in 2012-14 were down compared to the earlier period, particularly in the areas that had the most frequent detections in years past.

New rules in the Waste Discharge Requirements recently adopted for Central Valley Coalitions infer that growers switched away from the organophosphates to other insecticides, most not tested for in coalition water sampling programs. Those rules require the coalitions to begin analyzing for the "new" pesticides that are

commonly used in place of the OPs.

Before the testing begins, the Water Board is looking for direction from a Pesticide Evaluation Work Group that is charged with creating a prioritization method for selecting pesticides to sample for based on the amount applied and their potential impacts to aquatic life. The group of 13 technical water experts began meeting in September and is expected to release their recommendations in January or February 2015. Once put in place by the Water Board's Executive Officer, the process will be used by every coalition to develop a unique list of pesticides to monitor in each of their watersheds.

Prior to adding a pesticide to a particular watershed sampling list, the coalitions must first analyze use information gathered by County Agricultural Commissioners to verify that the pesticide is being applied to crops in the watershed. Should water

testing find the product, the Regional Water Board will then need to develop a water quality criterion for that pesticide that is protective of aquatic life. Setting those criteria is expected to take one to two years, at a minimum. In the meantime, an interim criterion will be used to evaluate water quality.

Testing for the new pesticides is expected to add to coalition monitoring costs, in part because commercial laboratories do not commonly analyze for the newer products. Developing new methods for measuring these pesticides and calibrating the lab instruments is expected to contribute to higher costs. A final list of pesticides will need Water Board approval before sampling is started. Each Coalition submits its list of pesticides to the Water Board by August 1 of each year. ☹️



First Groundwater Assessment Report Nearing Final Approval

The first coalition Groundwater Assessment Report (GAR) is nearing the end of its review phase by Water Board staff and is expected to be approved by early 2015. The report, prepared by consulting hydrogeologists for the East San Joaquin Water Quality Coalition (ESJWQC), shows that just over 70% of the coalition membership acreage is highly vulnerable to groundwater contamination. The report also proposes how the coalition will prioritize its efforts to address nitrate groundwater contamination in the highly vulnerable areas.

The 300-page report, which cost the ESJWQC more than \$300,000 and took numerous meetings with the Water Board and rewrite sessions to come up with a final product, is based on results from thousands of well tests taken over the last ten years, soil surveys and other existing groundwater data about the region. Each Central Valley coalition is required to prepare and submit for Water Board review this detailed report

that among other things, proposes the location of high and low vulnerability regions within the coalition boundaries. A high vulnerability region is where the Coalition determines that the groundwater may be at risk of having nitrate at a concentration that exceeds the drinking water standard. A final determination is made on the proposed vulnerability areas by the Regional Water Board based on information proposed in the GAR.

After its GAR is approved, ESJWQC will begin preparing a Groundwater Trend Monitoring Workplan that proposes the location of wells to be sampled over the next 10-plus years to track trends in groundwater quality. Sampling is not expected to occur more than once annually or even less frequently, and will likely focus on the shallowest wells that are used for drinking water. 🐾

Westside Coalition Begins Collecting Farm Evaluations

Farm Evaluation surveys were mailed in September and October to growers in the Westside San Joaquin River Watershed Coalition (Westside Coalition). As part of its Waste Discharge Requirements adopted on January 9, 2014, members of the Westside Coalition must complete a Farm Evaluation survey that is based on a template used by all Central Valley Coalitions. The survey asks about general farming practices used when applying pesticides and nutrients; types of irrigation systems on the land; and well head protection measures.

The Westside Coalition is working with water districts throughout its region to provide technical support for members when filling out the forms.

Completed surveys should be mailed to the district address noted on the survey. Forms must be filled out completely and properly or they will be returned to the grower to be completed according to the supplied instructions. The deadline for returning the surveys is December 15.

General information about the surveys can be viewed at www.westsidesjr.org; specific information is available from a member's local water district or by calling the Westside Coalition at 559-592-9237. The Westside Coalition region encompasses irrigated land west of the San Joaquin River; from Tranquility on the south to Vernalis on the north. 🐾

Southern San Joaquin Valley Coalition Reorganizes

Since the water quality coalitions were organized in the Central Valley in 2004, one coalition represented the irrigated lands south of the San Joaquin River to the Tehachapi mountains. The Southern San Joaquin Water Quality Coalition (SSJWQC) was made up of watershed groups and water districts encompassing the Kings, Tule, Kaweah and Kern River watersheds.

Shortly after the Waste Discharge Requirements (WDR) were passed for the Tulare Lake Basin in September 2013, the watershed groups and water districts decided to form separate, standalone entities to manage the WDR for growers in their regions. Each group set up its own dues structure based on acreage in their watersheds or districts, extent of surface water monitoring sites, groundwater programs and organizational overhead. All the groups share similar deadlines for Farm Evaluations, nitrogen fertilizer reporting and groundwater monitoring.

During this transition period, the SSJWQC has become a regional coordinating body under which several of the new coalitions meet to discuss policy issues and administration challenges. When it comes to WDR water monitoring and reporting, each of the seven entities develops its own program specific to the conditions in their region. Each organization applied and was accepted as a third-party entity to represent their members in the Irrigated Lands Regulatory Program. The coalitions, from north to south are:

- Kings River Water Quality Coalition
- Kaweah Basin Water Quality Association
- Tule Basin Water Quality Coalition
- Kern River Watershed Watershed Coalition Authority
- Cawelo Water District
- Buena Vista Coalition
- Westside Water Quality Coalition 🐾

Nitrogen Management Plan Templates Being Finalized

A template for reporting nitrogen fertilizer applications is up for final review and possible approval at press time. The Regional Water Board is set to review the draft nitrogen management plan (NMP) template at its December 4, 2014 meeting in Rancho Cordova.

The template is a slightly modified version of a document submitted to the Regional Water Board in April 2013. Its adoption was delayed to give time for the State Water Board's Expert Panel to convene. Once approved, all growers in the Central Valley will be required to complete the NMP and have it available for Water Board inspections.

Summary information from the NMP will need to be sent to coalitions annually for aggregation into reports compiled by township.

Deadlines for preparing an NMP and submitting the summary information vary by coalition (see summary chart in this issue). First to need an NMP are members of the East San Joaquin Water Quality Coalition and Westside San Joaquin Water Quality Coalition. Those plans need to be prepared in Spring 2015 for the 2015 crop year. The deadline for reporting nitrogen use information is the following Spring 2016. 🐾

Central Valley Coalitions Contact Information and Key Deliverable Dates and Deadlines

(Entities listed from north to south)

COALITION NAME MAIN CONTACT	1. GAR & SEDIMENT DISCHARGE ERO AR	2. FARM EVALUATION	3. NITROGEN MGMT PLAN	4. SEDIMENT & ERO CP	5. REPORT NITROGEN APPLIED
SACRAMENTO VALLEY WATER QUALITY COALITION BRUCE HOUESHELDT BRUCEH@NORCALWATER.ORG WWW.NORCALWATER.ORG	6/4/2015	3/1/2015	3/1/2015	6/4/2015	3/1/2016
CALIFORNIA RICE COMMISSION ROBERTA FIROVED RFIROVED@CALRICE.ORG WWW.CALRICE.ORG	8/2/2013	11/30/2014	11/30/2014	N/A	N/A
SAN JOAQUIN COUNTY & DELTA WATER QUALITY COALITION MICHAEL WACKMAN MICHEALKW@MSN.COM WWW.SJDELTAWATERSHED.ORG	4/25/2015	HV- 6/15/2015 LV- 6/15/2015	HV- 6/15/2015 LV- 6/15/2017	HV- 180 DAYS FROM APPROVED SDEAR LV- NOT REQUIRED	HV- 6/15/2016 LV- NOT REQUIRED
EAST SAN JOAQUIN WATER QUALITY COALITION PARRY KLASSEN PKLASSEN@UNWIREDBB.COM WWW.ESJCOALITION.ORG	1/13/2014	LF HV- 3/1/2015 SF HV- 3/1/2015 LF LV- 3/1/2015 SF LV- 3/1/2017	LF HV- 3/1/2015 SF HV- 3/1/2017 LV- 3/1/2017	LF- 180 DAYS FROM APPROVED SDEAR SF- 1 YEAR FROM APPROVED SDEAR	LF HV- 3/1/2016 SF HV- 3/1/2018 LV- 3/1/2018
WESTSIDE SAN JOAQUIN RIVER WATERSHED COALITION JOSEPH MCGAHAN JMCGAHAN@SUMMERSENG.COM WWW.WESTSIDESJR.ORG	3/17/2015	ALL-12/15/2014 HV. UPDATE YRLY. LV. UPDATE 5 YRS.	LG. HV 4/15/2015 SF HV 4/15/2017 ALL LV 4/15/2017 ALL UPDATE YEARLY	LG. HV 9/15/2015* SM. HV 3/17/2016* LV. NOT REQUIRED *TENTATIVE DATE	LG. HV 3/1/2016 SM. HV 3/1/2018 LV. NOT REQUIRED
WESTLANDS WATER QUALITY COALITION CHARLOTTE GALLOCK CGALLOCK@WESTLANDSWATER.ORG WWW.CA.GOV/RESOURCE-MANAGEMENT/LF-IRRIGATED-LANDS-MANAGEMENTPROGRAM/	2/16/2015	HV 3/1/2015 LF LV 3/1/2016 SF LV 3/1/2018	LF HV 3/1/2015 SF HV 3/1/2015	LF- 180 DAYS FROM APPROVED SDEAR SF- 1 YR FROM SDEAR APPROVAL	3/1/2016
*KINGS RIVER WATER QUALITY COALITION CASEY CREAMER CASEY@KINGSRIVERWQC.ORG WWW.KINGSRIVERWQC.ORG	HV-3/1/2016 LV-3/1/2016 SF LV-3/1/2018	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*KAWEAH BASIN WATER QUALITY ASSOCIATION DONALD IKEMIYA DIKEMIYA@KAWEAHBASIN.ORG WWW.KAWEAHBASIN.ORG	FEBRUARY 7, 2015	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*TULE BASIN WATER QUALITY COALITION DAVID DEGROOT DAVIDD@4-CREEKS.COM , RSCHAFFER@RLSMAP.COM WWW.TBWQC.COM	2/4/2015	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*KERN RIVER WATERSHED COALITION AUTHORITY NICOLE BELL NBELL@KRWCA.ORG WWW.KRWCA.ORG	2/4/2015	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*CAWELO WATER DISTRICT DAVE HAMPTON DHAMPTON@CAWELOWD.ORG WWW.CAWELOWD.ORG	4/27/2015	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*BUENA VISTA COALITION TIM ASHLOCK TIM@BVH2O.COM	2/4/2015	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18
*WESTSIDE WATER QUALITY COALITION GREG HAMMETT ADMIN@WWQC.ORG WWW.WWQC.ORG	3/1/15, 2016 AND 2018	HV - 3/1/2016 SF HV - 3/1/2016 LV - 3/1/2018	LF HV - 90 DAYS AFTER NMP APPROVAL; PLANS CERTIFIED BY 3/1/2016 SF HV - 3/1/2017 SF/LF LV- 3/1/2017	LF-180 DAYS FROM APPROVED SDEAR SF - 1 YEAR FROM APPROVED SDEAR	LF HV 3/1/2017 SF HV 3/1/18

* Due dates for Tulare Lake Basin coalitions subject to approval at December 4, 2014 Regional Water Board hearing

1. Groundwater Quality Assessment Report (GAR) / Sediment Discharge & Erosion Assessment Report
2. Farm Evaluation

3. Nitrogen Management Plan
4. Sediment & Erosion Control Plan
5. Nitrogen Management Plan Summary Report

LV = Low Vulnerability
HV= High Vulnerability
SF = Small Farm
LFF = Large Farm

Group to Study Management Practices

Are current farming practices for applying nitrogen fertilizers protective of groundwater quality? That is a key question that water quality coalitions are charged to answer in the new Waste Discharge Requirements (WDR). Coming up with the answers is going to be a costly, time consuming effort and coalitions are allowed to join forces to perform the field studies necessary to gather the scientific information needed on current farming practices.

Called a "Group" approach in the WDR, all or some of the coalitions could combine resources or even choose to do alone the studies required under the Management Practices Effectiveness Program (MPEP).

In July, the first Group notified the Regional Water Board that it had signed a Memorandum of Agreement (MOA) and was ready to proceed to develop a plan. The coalitions in the group include:

- East San Joaquin Water Quality Coalition;
- Sacramento Valley Water Quality Coalition;
- San Joaquin County and Delta Water Quality Coalition;
- Westside San Joaquin River Watershed Coalition.

The four coalitions formed a Coordination Committee to direct the development, preparation, and implementation of the Group Workplan and reports. This committee included the Executive Directors of each Coalition, a member of each Coalition's Board of Directors, and an alternate for each board member. Parry Klassen, Executive Director for the ESJWQC, is chair of the committee.

The Committee is committed to following the objectives outlined in each Coalition's Waste Discharge Requirements:

- Identify whether site-specific and/or community-specific management practices are protective of groundwater quality within high vulnerability groundwater areas;
- Determine if newly implemented management

practices are improving or may result in improving groundwater quality;

- Develop an estimate of the effect of Member's discharges of constituents of concern on groundwater quality in high vulnerability areas. A mass balance and conceptual model of the transport, storage, and degradation/chemical transformation mechanisms for the constituents of concern, or equivalent method approved by the Executive Officer, must be provided;
- Utilize the results of evaluated management practices to determine whether practices implemented at represented member farms (i.e., those not specifically evaluated, but having similar site conditions), need to be improved.

The Coordination Committee recently formed an Advisory Group of technical experts and stakeholders to assist in developing a conceptual study outline which will then be utilized to develop the specific MPEP Work Plan for the crop studies. These technical experts and stakeholders come from the University of California Agriculture and Natural Resources, California Department of Food and Agriculture, the International Plant Nutrition Institute and commodity groups. The conceptual study outline will guide crop technical experts as they develop individual work plans; one for perennials and one for annual crops.

Recently the Coalition for Urban Rural Environmental Stewardship (CURES) was appointed to serve as MPEP Program Administrator. CURES will manage funding development, creating scopes of work, oversee work with contractors to develop budgets and track progress of field studies.

Once the conceptual study outline is approved by the Regional Water Board, Requests for Qualifications will be sought from experts in annual and perennial crops to oversee development of work plans. Researchers will be hired on contract to perform studies which will be supervised by the annual crop and perennial crop technical coordinators. A conceptual study design is due June 2015 with a final plan due March 1, 2016. 🌱

State Acreage Fees Remains Flat

The State Water Board kept acreage fees at 75 cents per acre for 2015, unchanged from 2014. The fee is charged to landowners and growers who participate in water quality coalitions throughout California and is included in dues paid to coalitions. Dairies covered by an individual WDR saw a dramatic increase in fees for 2015. Acreage fees collected by the State Water Board are distributed to the Regional Water Boards to cover costs to staff the irrigated lands programs. Coalition and farm organizations have been seeking relief from the fees for acreage that is fallow due to the drought. Acreage fees for 2016 will be announced when Governor Brown releases the first budget proposal in Spring 2015. 🌱

Grower Certification for Nitrogen Plans In the Works

An effort is in the works to set up a grower certification program for nitrogen management plans.

The new Waste Discharge Requirements (WDR) mandate that nitrogen fertilizer plans for growers in high vulnerability groundwater basins must be signed by a Certified Crop Advisor (CCA) or other licensed agronomist. Growers can certify their own plans if they participate in a program approved by the Regional Water Board.

Such a grower certification program is in development by Central Valley coalitions. A draft plan was presented in October at a joint meeting with the Water Board, California Department of Food and Agriculture (CDFA) and the University of California (UC). Discussions are likely to continue through this winter with a program rollout possible by Winter 2015-16.

The proposed program would certify a grower after they complete an initial training and attend continuing education courses over a three-year period. The grower would then be able to certify nitrogen management plans used only on owned or leased land.

The curriculum is expected to be based on the existing CCA training program developed by CDFA and UC and would focus on the fundamentals of nitrogen fertilizers, crop nitrogen use cycles and instructions for completing a nitrogen management plan. It is envisioned that the Central Valley coalitions would organize training sessions in conjunction with UC Farm Advisors, CDFA, commodity groups and other agricultural entities. 🌱



Coalition for Urban Rural Environmental Stewardship
1480 Drew Ave., Suite 130
Davis, CA 95618

Watershed Coalition

Ask The Water Board

Watershed Coalition News asks readers to pose questions to the Regional Water Board. The column is based on information from a RWB letter sent to members of the East San Joaquin Water Quality Coalition who did not complete a Farm Evaluation Survey.

What are the potential ramifications of not completing the Farm Evaluation?

Completing the Farm Evaluation is one of the requirements for participating in a third party organization formed to represent farmers in the Central Valley. Depending on the rules set by the coalition representing a grower, failing to complete a farm evaluation may prompt expulsion from the coalition. Then the grower would need to seek an individual permit to be in compliance with the Irrigated Lands Regulatory Program.

What happens if I don't return a Farm Evaluation?

Failure to submit your Farm Evaluation by the required due date may subject you to fines as high as \$1,000 per day for every day after the deadline. It may also result in the Central Valley Water Board directly regulating your farming operation.

What does it mean to have direct regulation of my farm?

If a grower's irrigated crop land is not covered by a coalition WDR, the board has adopted a WDR that applies to growers that are not represented by coalitions. For individuals, the current State fee for a 50 acre farm is approximately \$1,400 (or about \$28/acre) and the associated monitoring and reporting costs could be as high as \$50/acre – for a total cost for fees, monitoring, and reporting of over \$75/acre. This cost is about 20 times greater than the fees charged by a coalition, which include State fees (currently \$0.75/acre), as well as costs for the coalition to conduct monitoring and provide reports to the Central Valley Water Board.

The legal requirements are described in the "Waste Discharge Requirements General Order For Discharges from Irrigated Lands within the Central Valley Region for Dischargers not Participating in a Third party Group": go to http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/new_waste_discharge_requirements/individual_growers_wdrs/index.shtml

How will the Water Board find out if I don't turn in my survey?

The Order requires coalitions to identify those members who have not submitted a Farm Evaluation. The Central Valley Water Board intends to take action against those members that have failed to submit their Farm Evaluation to the coalition. To avoid fines and the potential imposition of more stringent and costly regulatory requirements, you are encouraged to submit your Farm Evaluation to the coalition in a timely manner.

Irrigated Lands Program staff can be reached via phone at (916) 464-4611, or via e-mail at www.lrlands@waterboards.ca.gov. If you call, you will be asked to allow up to two business days for staff to return your call. More FAQs at http://www.waterboards.ca.gov/centralvalley/water_issues/irrigated_lands/new_waste_discharge_requirements/ilrp_faq.pdf

