



State Water Resources Control Board's Proposed Revisions to the East San Joaquin Water Quality Coalition General Waste Discharge Requirements

The State Water Resources Control Board (State Water Board) issued a proposed order in February revising the East San Joaquin Water Quality Coalition's General Waste Discharge Requirements (WDR). The WDR is part of the Central Valley Regional Water Quality Control Boards' Irrigated Lands Regulatory Program (ILRP) to address runoff from irrigated agriculture. These revisions are in response to three petitions the State Water Board received challenging the coalition's WDR.

The proposed order goes beyond nitrogen management recommendations from the statutorily mandated Nitrogen Tracking Task Force and Agricultural Expert Panel, and incorporates the State Water Board's own judgement.

Opportunities for Public Participation

The State Water Board will hold a workshop on **Wednesday, May 4, 2016**, commencing at 9:00 a.m. at the Cal/EPA Building, 1001 I Street in Sacramento. An additional workshop will be held on **Tuesday, May 17, 2016**, commencing at 9:00 a.m. at the San Joaquin Valley Air Pollution Control District, Central Region, 1990 E. Gettysburg Avenue in Fresno. Written comments on the proposed order must be received by 5:00 p.m. on **Wednesday May 18, 2016**.

Farm Bureau will testify at the Sacramento workshop as well as submitting written comments. **Farm Bureau urges all County Farm Bureaus, as well as members, to attend the workshops and submit written comments.** It is very likely that significant numbers of those supporting the proposed revisions will be bussed in, and therefore it is important to have a strong agricultural turnout. Information on the comment period and public workshops can be found at:

http://www.swrcb.ca.gov/public_notices/petitions/water_quality/a2239_sanjoaquin_ag.shtml

Statewide Implications

According to the State Water Board, the proposed order is precedential in nature and will apply statewide. Specifically, the proposed order would give direction to the Central Valley Water Board and **ALL other Regional Water Boards** to update (or develop) their irrigated lands regulatory programs to be consistent with the proposed order. For this reason, the proposed order has significant implications for irrigated agriculture statewide and would directly affect all growers whether enrolled in coalitions or complying as individual dischargers.

Significant Revisions to the East San Joaquin WDR

The proposed order includes, but is not limited to, the following precedential conditions:

1. The proposed order removes prioritization by vulnerability designations to create uniform (annual) reporting requirements for all members. Previously, only high vulnerability operations had additional regulatory requirements.



2. Operations are now broken into categories by size with phased-in deadlines. Small operations are those with less than 60 acres, medium operations are those with 60 acres or more but less than 250 acres, and large operations are those with 250 acres or more.
3. All farmers would have to participate in outreach events, update their farm evaluation annually, have certified Nitrogen Management Plans (NMP), and submit NMP summary reports to the coalition. Previously, these were only required for growers in high vulnerability areas.
4. The farm evaluation checklist of management practices would be expanded, and would include two additional questions about coalition notifications to enrolled growers: 1) did the coalition notify you of having a higher than average nitrogen application value?; and 2) did they notify you of being in a surface or groundwater management area?
5. Information identifying farmers' method of irrigation (i.e. surface, sprinkler, drip) would be added as part of the Nitrogen Management Plan and, therefore, renamed the Irrigation and Nitrogen Management Plan (INMP). The proposed order would continue to require reporting of the amount of nitrogen applied and removed on a field-by-field basis, but would revise the specific types of measurements that would be reported.
 - a. The coalition must now calculate a three-year running average for the A/R (applied/removed) ratio and the A-R difference for each member.
 - b. The coalition must publish nitrogen removed coefficients for crops that cover 95% of acreage within its boundaries by March 1, 2019 and 99% of the acreage by March 1, 2021.
 - c. The Central Valley Water Board would then develop acceptable ranges for multi-year A/R ratio target values by crop.
6. The coalition would now also provide the raw data submitted by each grower to the Central Valley Water Board, making this data accessible to the general public (the Nitrogen Task Force recommended that only an aggregation of the data be submitted).
 - a. The coalition must submit all field-specific Farm Evaluation data identified by location. Previously, data was identified at the township level rather than by field location.
 - b. The coalition must submit all nitrogen application data by field, identified by location.
7. Each farm would be required to monitor all drinking water supply wells, including land owner or tenant wells that you may not have authority to access. Monitoring results would be submitted to the Central Valley Water Board in the Annual Monitoring Report.

Nitrogen Management Requirements

Nitrogen removed is calculated from the total amount of crop material removed from the field. The information needed to calculate nitrogen removed is not currently available for many crops. Therefore until more research is done, nitrogen removed will be estimated from **farmers' reported crop yield (again, public information)**.



The coalition would analyze the Farm Evaluation data and INMP Summary Report data submitted and work with those growers that may need to develop management practices to improve nitrogen and irrigation efficiency. The coalition would be required to electronically submit all individual data and data analyses to the Central Valley Water Board. Initially the coalition would submit the individual data for crop years 2016 through 2018 to the Central Valley Water Board in May of 2019 and for each subsequent year annually.

The proposed order concludes that the Central Valley Water Board should develop acceptable multi-year nitrogen applied/removed (A/R) ratio ranges, and to do so, the Central Valley Water Board should receive all of the A/R ratio data. This process for calculating acceptable multi-year A/R ratio ranges would be based on grower-reported data, rather than estimates or numbers derived through isolated studies. The Central Valley Water Board would then use the A/R ratio, which would serve as a proxy for groundwater quality monitoring with regard to nitrogen discharges, as the feedback mechanism for determining the effectiveness of nitrogen management practices.