

Summary of SWRCB Adopted Order **Related to the Eastside SJR WDR**

On February 7, 2018, the SWRCB adopted Order WQ 2018-0002 related to the petition of the Eastern San Joaquin Watershed WDR. Although this order specifically applies to the Eastside SJR WDR, the SWRCB made the portions of the order precedential to other irrigated land programs. Therefore this order will impact most if not all of the other existing agricultural WDRs. Following is a brief summary of the main revisions in the adopted order.

Vulnerability Distinctions Essentially Eliminated

The order maintains groundwater vulnerability distinctions but requires Low Vulnerability growers to comply with new provisions that in the past were limited to growers farming in High Vulnerability areas. Low Vulnerability growers have longer deadlines for submitting some forms and growers in Low Vulnerability Areas need not certify their INMP unless they have been determined to be outliers as a result of their INMP Summary data. However, all members, including Low Vulnerability growers must comply with other requirements of the order including: 1) Completion of Farm Evaluation Plans (FEP) 2) Preparation of Irrigation and Nitrogen Management Plans (INMP) 3) Submission of INMP Summary Reports (4) Annually attend a grower outreach/education event.

Nitrogen Management Plans become Irrigation and Nitrogen Management Plans

The order incorporates irrigation management into the existing Nitrogen Management Plan (NMP) to create an Irrigation and Nitrogen Management Plan (INMP). The new INMP requirements will not become effective until March 2019. All growers will be required to develop these plans and all High Vulnerability area plans need to be certified by an Irrigation and Nitrogen Management Plan Specialist or self-certified by the member that has completed an Irrigation and Nitrogen Management Plan training course. Growers that farm fields that are outside standard nitrogen application/removal ratios (A/R Ratios) will have additional requirements, such as, Low Vulnerability growers will be required to certify their INMP and Self-certified members will be required to attend additional training or hire a specialist to certify their INMP.

NMP Summary Reports become INMP Summary Report

All Members will be required to submit INMP Summary Reports to the coalition. New INMP Summary Report requirements will not become effective until March 2020. Growers will be required to submit data on a field level basis. Data on multiple fields may be combined in reports if the areas have the same crop type and the same fertilizer inputs and irrigation management. Such combined field reporting units shall not exceed 640 acres. The INMP Summary Reports will include total applied nitrogen from each source, crop yield, and an estimate of the nitrogen removed with the harvested crop based on crop yield. These numbers will be used to estimate the potential risk to groundwater from nitrates applied on each field by calculating the ratio of applied nitrogen to removed nitrogen (A/R Ratio) and the difference between the total applied nitrogen and the total removed nitrogen (A-R Diff). Regional Boards are given some flexibility to modify Applied and Removed reporting requirements for certain types of farms such as 1) Farms with limited nitrogen impacts and limited nitrogen inputs such as Pastures, 2) Small (45 acres or less) socially disadvantaged growers 3) Small (20 acres or less) diversified farms with more than one crop per every two acres.

Drinking Water Supply Well Monitoring Added

In 2019, Members will be required annually to monitor all drinking water supply wells present on their property. If a well is found to be above the maximum contaminant level (MCL) for nitrate the Member must notify the Regional Board and the water users within 10 days. The order has specific requirements for the frequency and protocols for drinking water well monitoring. If sample concentrations are below 8 mg/l nitrate+nitrite as N in three consecutive annual samples the frequency of sampling may be reduced to once every 5 years. All well data must be reported in the SWRCB GeoTracker Database which will be done by the labs. Growers that can show the domestic wells are not being used for drinking water can be exempted from the sampling requirement.

Management Practice Implementation Report Added

Beginning in March 2019 all members that farm in areas with Surface or Groundwater Quality Management Plans shall complete a Management Practice Implementation Report (MPIR). The MPIR shall include management practices implemented by members to comply with the requirements of the surface and groundwater management plans. The majority of lands within the Westside Coalition are covered by either a surface water or groundwater management plan.

New Reporting, Analysis, and Data Management Requirements Imposed

The order requires coalitions to submit anonymized nitrogen use data to the Regional Board. Under this system coalitions will link growers' data to a unique identifier number and also link each parcel to a unique identifier number. This anonymized data will be accessible to the public but the data base will not divulge the specific name of the grower or the parcel location. Coalitions will maintain the key to link the unique identifier numbers to the growers and parcels. The Regional Board can ask for the identity and location of the anonymized data if they had a need for the specific grower information.

In addition to submitting the anonymized raw data the coalitions will be required to submit an evaluation comparing individual field data collected from the INMP Summary Reports. These comparisons must include, the ratio of nitrogen applied to nitrogen removed (A/R Ratio), and the difference between nitrogen applied and nitrogen removed (A-R Diff). Beginning after 3 years of data has been collected the coalitions must calculate and report a 3 year running total for both the A/R Ratio and the A-R Diff.

Coalitions must develop township specific Groundwater Protection Targets that are intended to achieve compliance with groundwater receiving water limitations. Such Targets will be developed in a process including public review and comment and will require regional board Executive Officer approval.

Surface Water Monitoring

The order questions the adequacy of the Eastside's surface water quality monitoring. The Order does not propose specific revisions to their monitoring approach but instead requires the Regional Board to conduct an external expert review process to evaluate the Eastside's program. The order also states that the SWRCB may in the future convene an expert panel to provide guidance on all irrigated lands surface water quality monitoring programs.

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