



VENTURA COUNTY
Agricultural Irrigated Lands Group

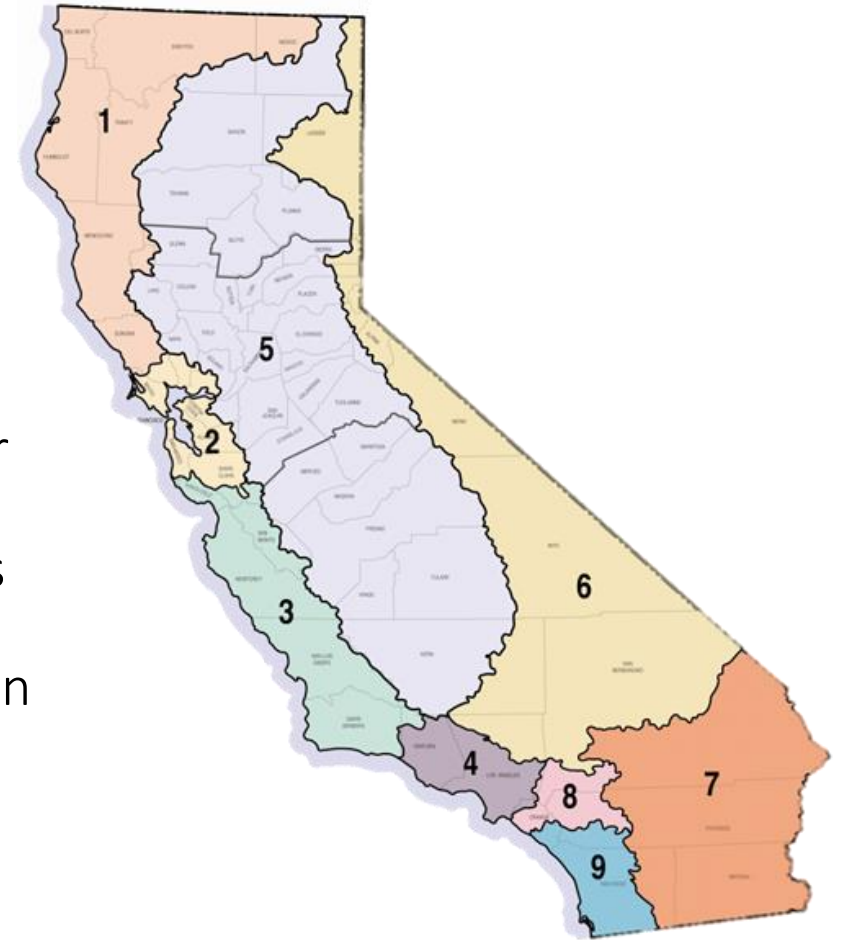
Navigating the New Ag Order Mandates: Overview of Irrigation, Nutrient Management, and TMDL Requirements

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Irrigated Lands Regulatory Program

- Corresponding Regional Water Quality Control Board administers each program (Conditional Ag Waiver, Ag Order/WDR)
- Applies to all growers who irrigate commercial crops
- Regulates water that discharges into surface water (irrigation & stormwater) as well as leaching to groundwater
- Control and prevent contaminants to protect beneficial uses
- Growers comply individually or by joining a 3rd party coalition
 - Ventura County Agricultural Irrigated Lands Group (VCAILG). Established in 2006 and administered by the Farm Bureau of Ventura County.



Irrigated Lands Regulatory Program History

1st Conditional Waiver term (2005 – 2010)

2nd Conditional Waiver term (2010 – 2016)

- Incorporated TMDLs

3rd Conditional Waiver term (2016-2021, extended through Sept. 2023)

- Increased focus on groundwater
- Source investigation studies for increasing trends
- Compliance dates for TMDLs
- Nitrogen Management Plan requirements for certain subwatersheds

Ag Order/WDR (Sept. 28, 2023)

- State-wide precedential nitrogen management tracking and reporting
- TMDL-driven requirements as deadlines come due




Precedential Requirements For Nitrogen Tracking and Reporting

What are the “Precedential Requirements”?

- East San Joaquin WDR adopted by State Water Resources Control Board (2018)
- Precedential for all Irrigated Lands programs in California
- Focus on addressing nitrogen in surface and groundwater through comprehensive irrigation and nutrient management program
 - Groundwater quality trend monitoring
 - Irrigation and Nutrient Management Plan (INMP) development
 - Irrigation and Nutrient Management Report (INMR) submittal
 - On-farm drinking well sampling
 - Groundwater protective formulas, values, and targets



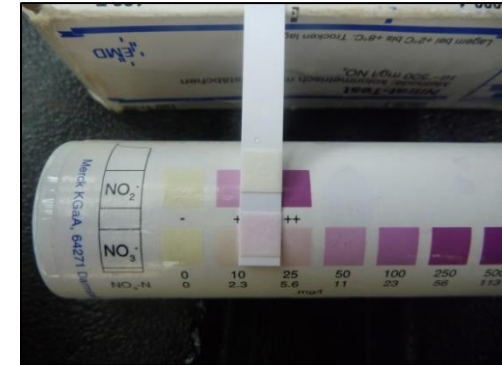
Irrigation and Nutrient Management Plan (INMP) Development

- INMP is an active planning document
 - Developed annually and kept on-farm (INMPs themselves not submitted)
 - One INMP developed per management unit (same crop, age, management practices (irrigation & nutrient inputs), and contiguous land)
 - Pre-season - Anticipates crop irrigation and nutrient needs
 - Post-season – Record actual application and harvest yield
- INMP certification required
 1. Self certified by grower attending CDFA-approved training workshop and passing exam 
 2. Self- Certified by grower that plan adheres to site-specific recommendations from NRCS Technical Service Providers
 3. Certified by Crop Advisor (CCA) certified by the American Society of Agronomy
- Initial plans are due **March 1, 2025**, and annually thereafter



Irrigation and Nutrient Management Report (INMR)

- INMR (summary report) required to be submitted annually
- Summary information includes:
 - Irrigation and nutrient management practice questions
 - Total N applied per management unit
 - Harvest yield (to be used to calculate N removal)
- Due **March 1, 2026**, and annually thereafter
- Submitted to VCAILG, anonymized, then submitted to Regional Board
- Data to be used to information development of Groundwater Protection Formulas, Values, and Targets
- Identification of outliers
 - Consider range of N applied – N removed per acre by crop type
 - Goal: identify and follow-up with outliers to provide targeted notification and education



INMP Program Development

Recent Activities

1. Development of INMP and INMR templates (approved March 2024)
2. Submit proposed N removal coefficients (submitted May 2024)
3. Development of data management system and reporting portal



4. Rollout of updated INMP Self-Certification training
 - August 29 and 30, 9:00 – 12:00 each day
 - Spanish version available soon

Next Steps

1. Train growers to self-certify INMPs
2. Continue working with Regional Board on remaining guidance needs
3. Growers to develop initial INMP(s) by March 1, 2025
4. Growers to report initial INMR(s) by March 1, 2026



An aerial photograph of a large agricultural field, likely a vineyard or orchard, with a complex network of irrigation canals. The field is divided into rectangular sections by the canals. In the background, there is a large, hilly mountain with some rocky outcrops. The sky is clear and blue. The overall scene depicts a well-organized agricultural landscape.

TMDL-Driven Requirements

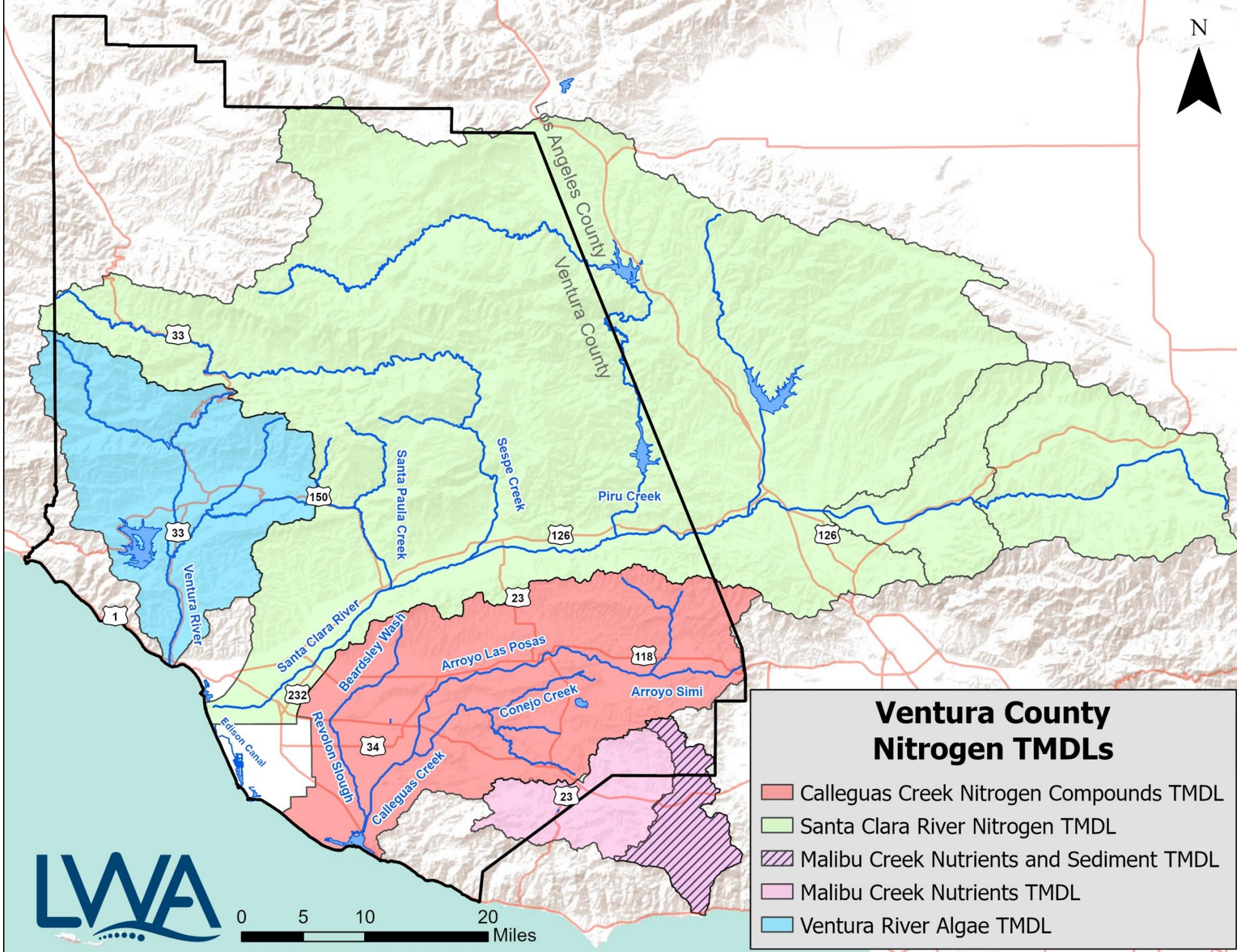
TMDL Compliance Dates

- **Total Maximum Daily Load (TMDL):** Watershed-specific plan to restore the beneficial use of an impaired waterbody
 - Additional regulatory layer that applies in areas draining to an impaired waterbody
- Each “Source Type” that discharges the constituent of concern is assigned an “allocation” in the TMDL
- TMDLs must be incorporated into a water quality permit to be enforced
- Load Allocations must be met by the compliance date



Total Maximum Daily Load (TMDL) Compliance Dates

| | TMDL Constituents | Conditional Waiver Compliance Date | Revised Ag Order Compliance Date |
|--------------------------------|---|------------------------------------|----------------------------------|
| Ventura River Watershed | Algae | June 28, 2019 | |
| | Trash (Ventura River Estuary) | October 14, 2020 | March 6, 2010 |
| Santa Clara River Watershed | Chloride (Upper Santa Clara River) | October 14, 2020 | April 6, 2010 |
| | Nitrogen Compounds | October 14, 2022 | March 23, 2004 |
| | Bacteria | March 21, 2023 dry | |
| | | March 21, 2029 wet | |
| Toxaphene | October 7, 2025 | | |
| Oxnard Plain/Coastal Watershed | OC Pesticides and PCBs (McGrath Lake) | June 30, 2021 | |
| | Pesticides, PCBs, and Sediment Toxicity (Oxnard Drain #3) | April 14, 2026 | |
| Calleguas Creek Watershed | Siltation | March 24, 2015 | |
| | Trash (Revolon Slough and Beardsley Wash) | October 14, 2020 | March 6, 2010 |
| | Toxicity, Chlorpyrifos, and Diazinon | March 24, 2022 | March 24, 2016 |
| | Metals and Selenium | March 26, 2022 | |
| | Boron, Chloride, Sulfate and TDS (Salts) | December 23, 2023 | |
| | Nitrogen Compounds and Related Effects | October 14, 2025 | July 16, 2010 |
| | OC Pesticides & PCBs | March 24, 2026 | |
| Malibu Creek Watershed | Sedimentation and Nutrients | July 2, 2021 | October 14, 2022 |
| | Nutrients | October 14, 2022 | |



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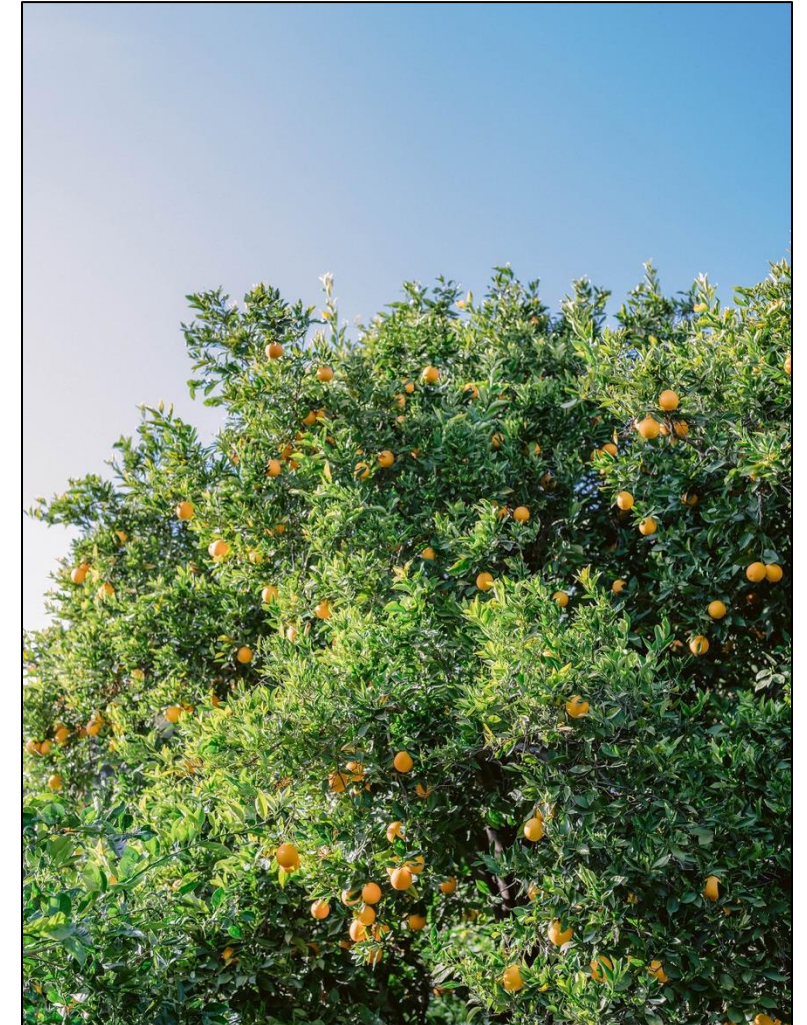
How TMDL-Driven Requirements Have Changed

Similar TMDL-Driven Requirements included in 2016 Conditional Waiver, but not implemented due to:

- Many TMDL compliance dates had not come due until recently
- Requirements tied to “encompassing and adjacent HUC-12 subwatersheds” rather than TMDL boundaries
- Uncertainty in how and where requirements apply - no process for identifying subject landowners or initiating new requirements

New requirements different in key ways

- Apply within TMDL boundaries
 - Many boundaries just recently determined (were not mapped during TMDL development)
 - TMDL boundaries are the basis of new Responsibility Areas (not yet approved)
- Some compliance dates have changed (now due sooner)
- Alternative Compliance Pathway added



TMDL-Driven Requirements

Following a TMDL water quality exceedance:

Grower within area being represented by exceeding monitoring site would select one of the following:

Track 1: Individual Monitoring (default compliance pathway)

- Grower submits field-specific Monitoring and Reporting Plans (MRPs) for edge-of-field sampling
- Sampling initiated following wet and/or dry season, continued until no exceedance for 2 years
- Results reported annually by grower to Regional Board
- Resampling every 5 years

Track 2: Implementation Focused Pathway (opt-in alternative compliance pathway)

- Grower works with a Technical Service Provider to develop and submit farm-level management practice plan
- Implements plan according to required timeline
- Update/revise within 60 days of notification by Regional Board (no sooner than 2 years after initial submittal)

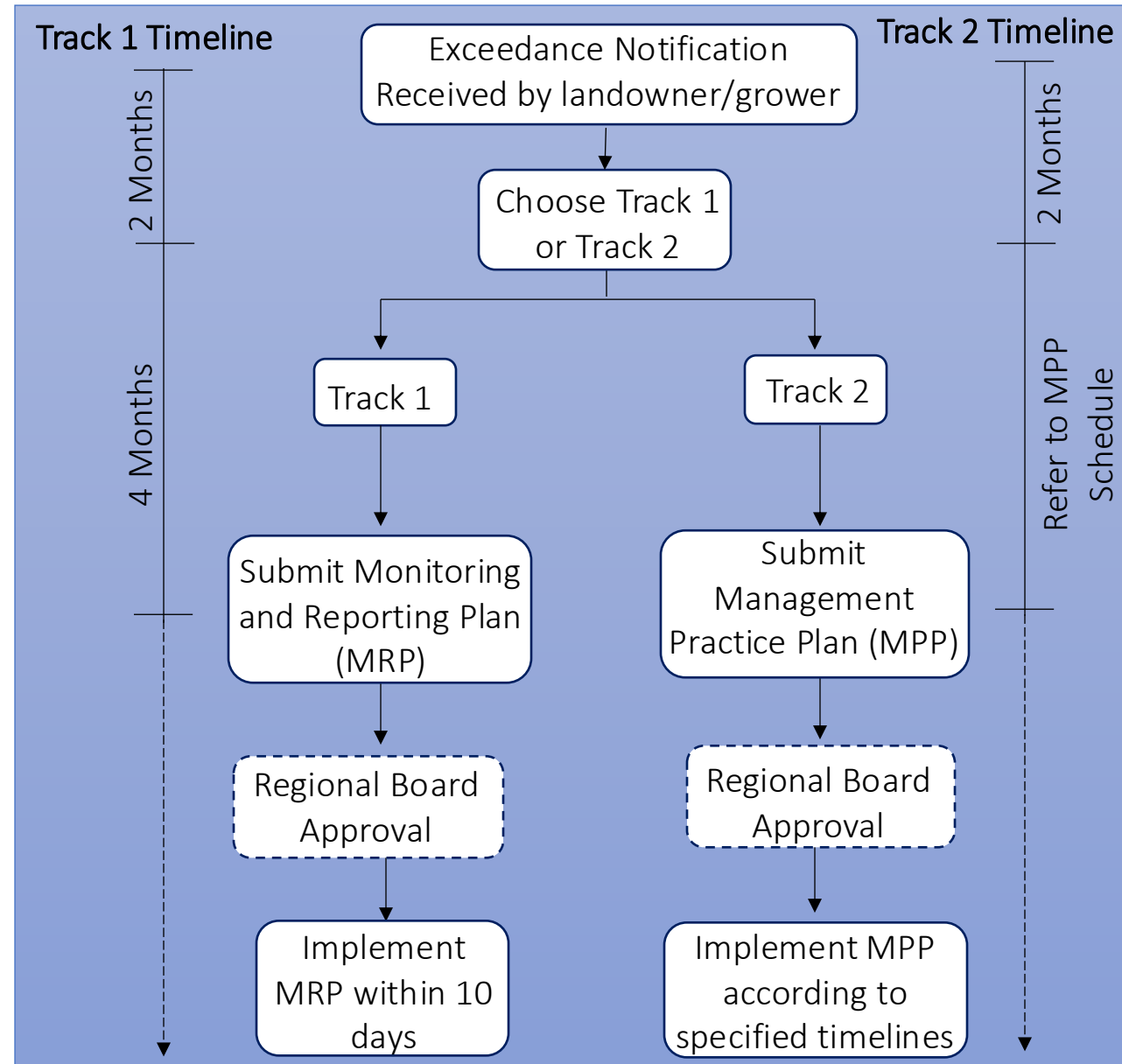


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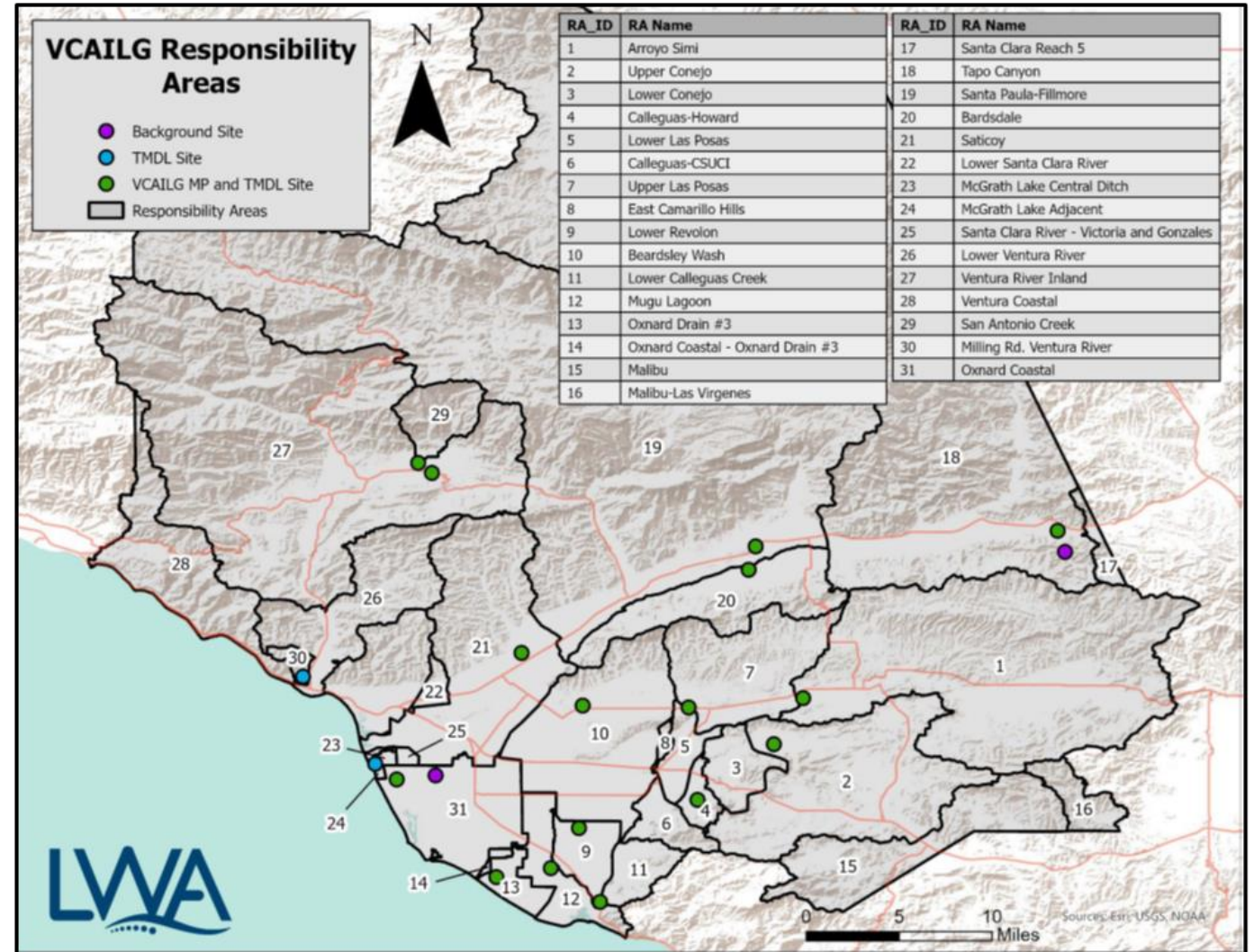
RESOURCE
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Track 1 and Track 2 Timelines



Track 2 MPP Submission Due Dates

| VCAILG RA (2024 MRP – pending RB approval) | | Associated Monitoring Site(s) | Date MPP Due | Date MPP Due (Diversified Socially Disadvantaged Growers) |
|---|--------|----------------------------------|-----------------|--|
| McGrath Central Ditch | 23 | OXD_CENTR, S02T_ELLS | 5/15/2024 | 5/15/2025 |
| SCR-Victoria and Gonzales | 25 | OXD_CENTR, S02T_ELLS | | |
| McGrath Lake Adjacent | 24 | OXD_CENTR | 9/15/2024 | 9/15/2025 |
| Ventura River Milling Rd. | 30 | V02D_SPM | | |
| Tapo Canyon | 18 | S04T_TAPO | | |
| Santa Paula-Fillmore | 19 | S03T_BOULD | 1/15/2025 | 1/15/2026 |
| Bardsdale | 20 | S03D_BARDS | 5/15/2025 | 5/15/2026 |
| SCR Reach 5 | 17 | S04T_TAPO | | |
| Arroyo Simi | 1 | 07D_HITCH_LEVEE_2 | 9/15/2025 | 9/15/2026 |
| Upper Conejo, Lower Conejo | 2 3 | 9BD_GERRY | 1/15/2026 | 1/15/2027 |
| Beardsley Wash | 10 | 05D_LAVD | 5/15/2026 | 5/15/2027 |
| East Camarillo Hills | 8 | | | |
| Malibu | 15 | | | |
| Malibu-Las Virgenes | 16 | 05D_LAVD | | |
| Upper Las Posas | 7 | 06T_FC_BR | 9/15/2026 | 9/15/2027 |
| Ventura River Inland | 27 | VRT_THACH | 1/15/2027 | 1/15/2028 |
| Lower Ventura River | 26 | | | |
| San Antonio Creek | 29 | VRT_SANTO | 5/15/2027 | 5/15/2028 |
| Lower Las Posas | 5 | 06T_FC_BR | | |
| Lower Santa Clara River | 22 | S02T_ELLS | 9/15/2027 | 9/15/2028 |
| Lower Calleguas Creek | 11 | 02D_DEER | 1/15/2028 | 1/15/2029 |
| Calleguas-Howard | 4 | 9AD_HOWARD | | |
| Mugu Lagoon | 12 | 01T_ODD2_DCH | | |
| Saticoy | 21 | S02T_ELLS | | |
| Lower Revolon | 9 | 04D_WOOD | | |
| Calleguas-CSUCI | 6 | 9AD_HOWARD | | |
| Oxnard Drain #3 | 13 | 01T_ODD3 EDI | 5/15/2028 | 5/15/2029 |
| Oxnard Coastal-Oxnard Drain #3 | 14 | | | |



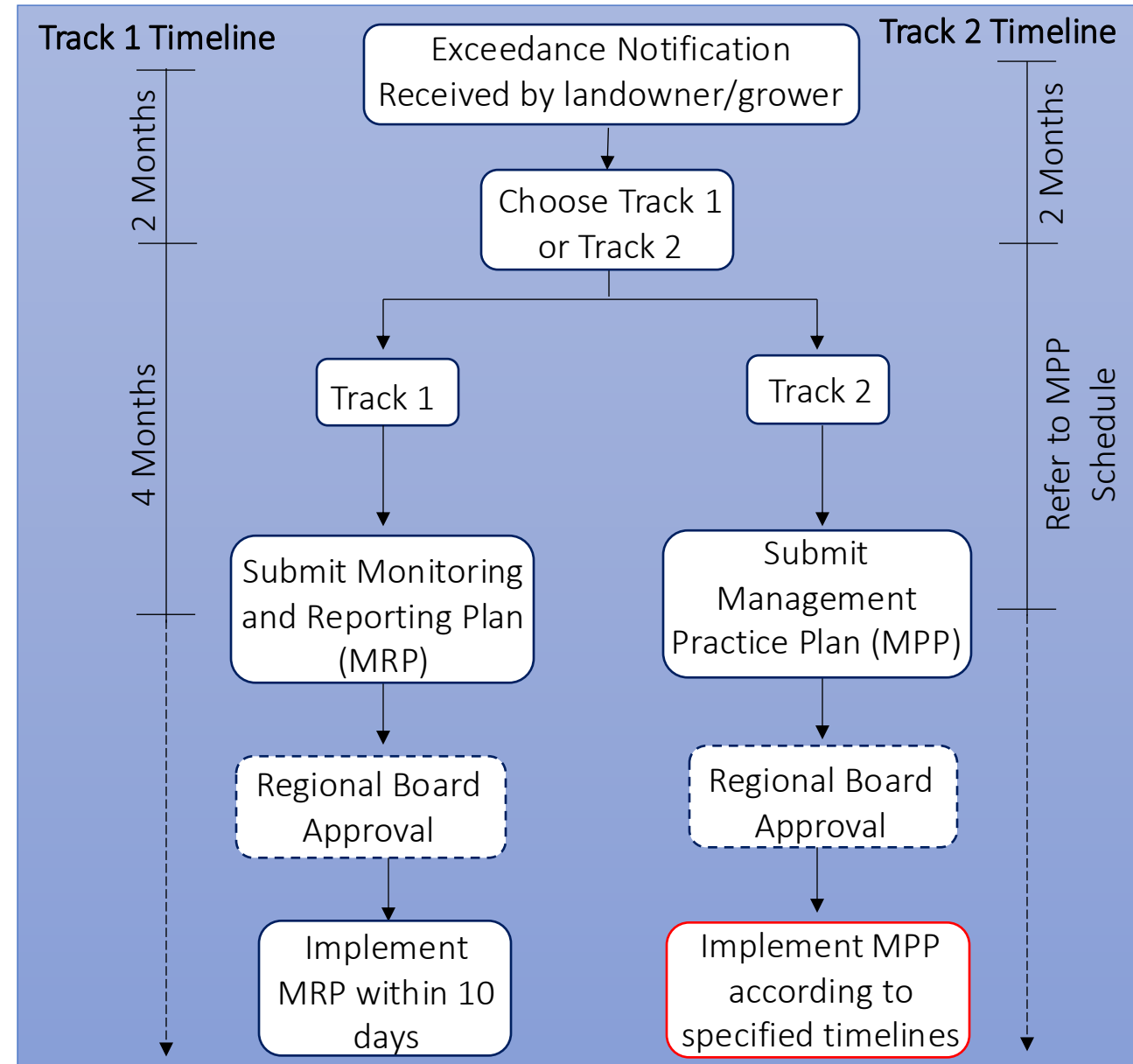
Track 1 and Track 2 Timelines

Track 2 Implementation Timeline

Upon Regional Board approval, complete implementation of MPP within following maximum timeframe:

- 5 months** **Vegetative practices**
(e.g., filter strips, grassed waterways, cover crop, etc.)
- 8 months** **Structural non-treatment practices**
(e.g., detention basins, etc.)
- 15 months** **Structural treatment practices**
(e.g., engineered wetlands, bioreactors, tailwater recovery, etc.) and regional projects

*Additional implementation time must be requested in MPP



What's Next

- Continued work with Regional Board staff to clarify requirements and develop guidance
- Awaiting approval of Monitoring and Reporting Plan, including revised Responsibility Areas
- VCAILG's focus over next year:
 - Outreach to growers upon Responsibility Area approval
 - Implement new Monitoring and Reporting Program
 - Develop updated Water Quality Management Plan
 - Conduct grower education meetings, including INMP Self-Certification Trainings
 - Build tools and programs to assist growers





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Questions?

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