

August 21, 2025

Nitrogen Monitoring in Ventura County

Where that is leading us under the Ag Order

Amy Storm

lwa
LARRY WALKER
ASSOCIATES


VENTURA COUNTY
Agricultural Irrigated Lands Group

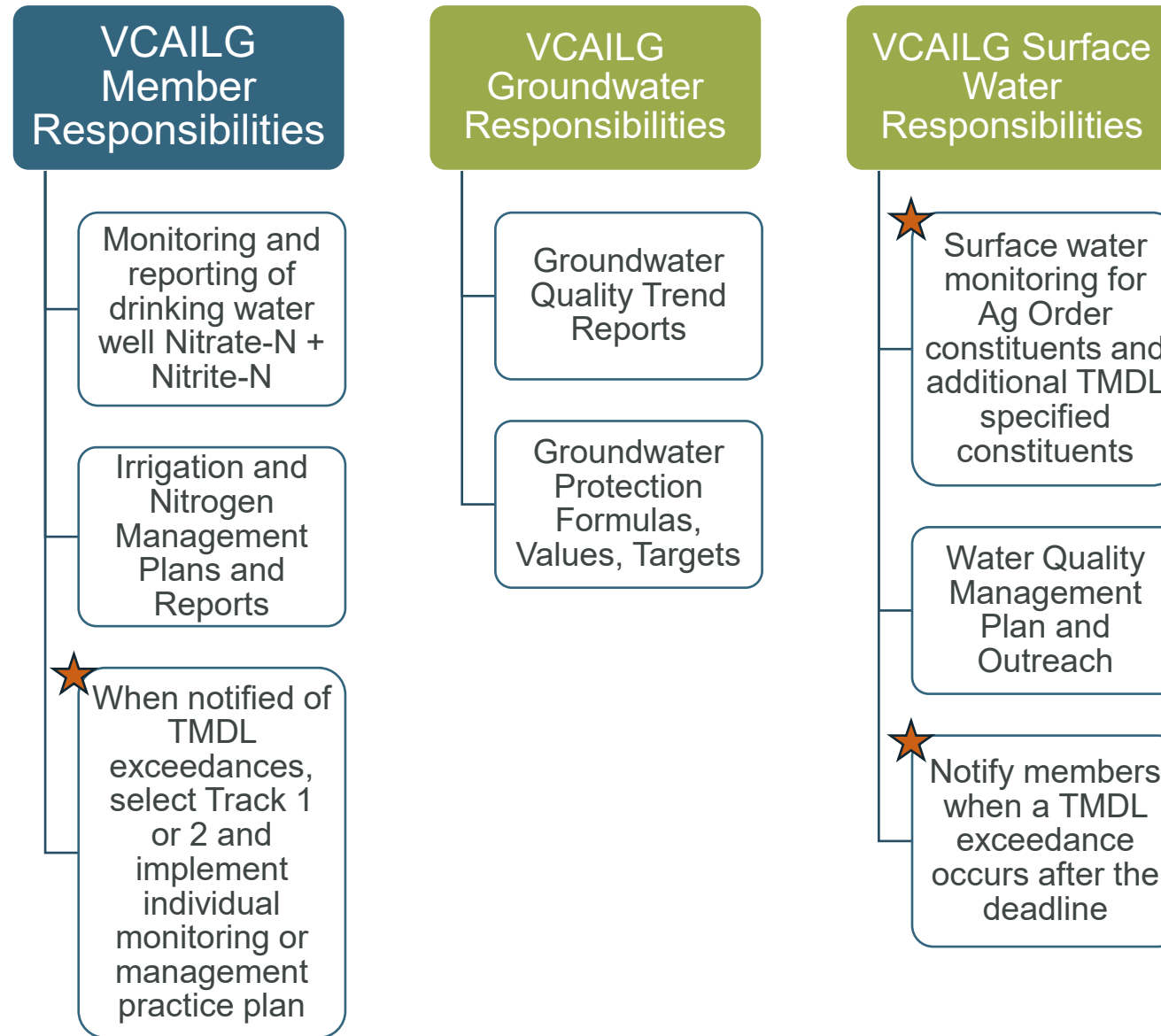


Agenda

- Nitrogen related components of the Ag Order
- VCAILG Surface Water Monitoring and Reporting
 - Nutrient related Total Maximum Daily Loads (TMDLs)
- What's Next?
 - Notice of Discharge Limitations Triggered
 - Selection of Compliance Method (Track 1 or 2)
 - On-farm Implementation



Nitrogen Related Components of the Ag Order



Surface Water Monitoring

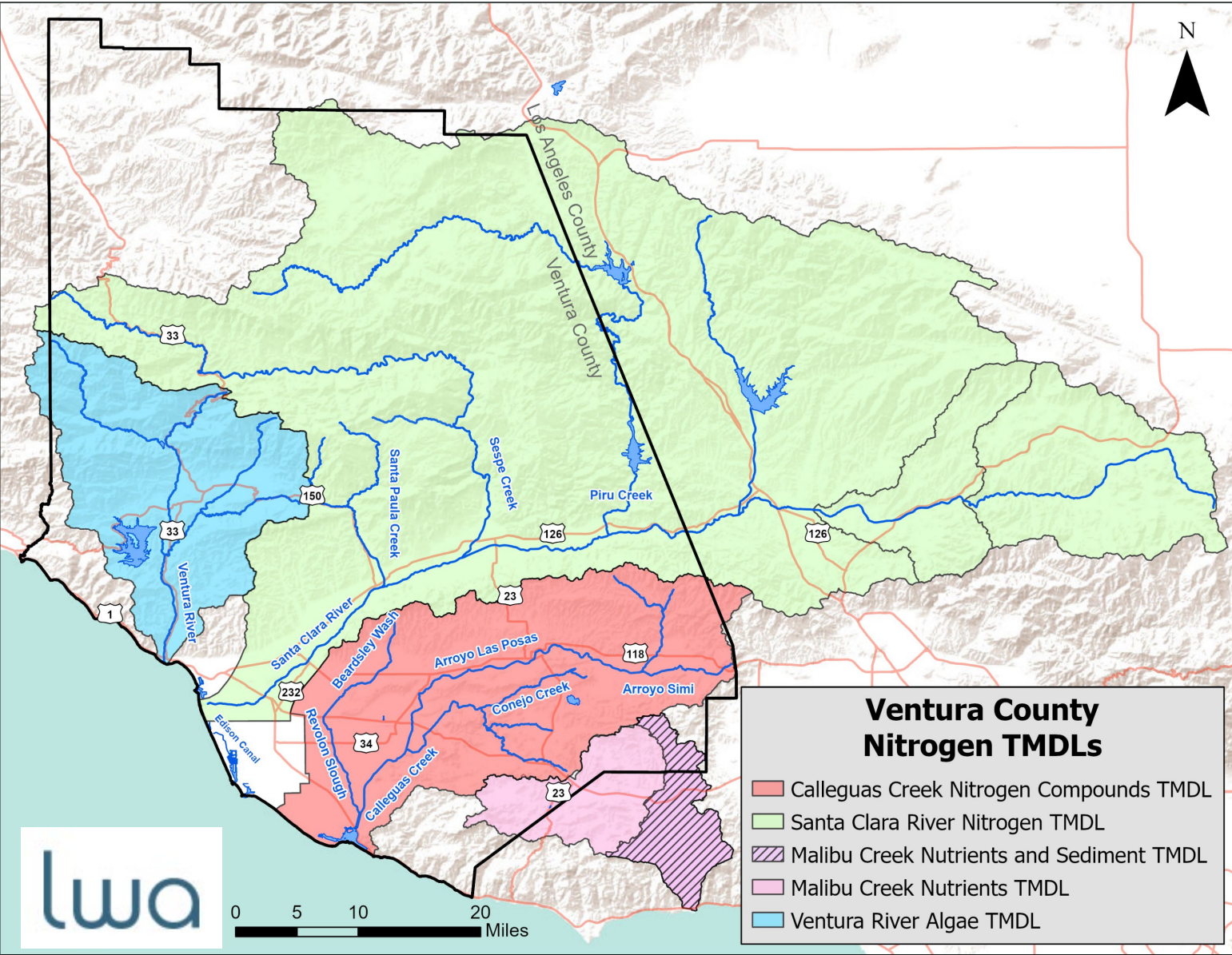
Total Maximum Daily Load (TMDL) Focus



Surface Water Monitoring

General Ag Order Monitoring <i>(Long List of Constituents)</i>	★ TMDL Monitoring <i>(Constituents Specified in the TMDL)</i>
Sample results compared to standard water quality benchmarks (Ag Order Appendix 4)	Sample results compared to TMDL load allocation for agriculture (Ag Order Appendix 5)
Exceedances identified in Annual Monitoring Reports; Water Quality Management Plan is then developed as the roadmap for implementing targeted MPs to address exceedances	Exceedances <u>after</u> TMDL deadline are reported to Regional Board for review/confirmation
VCAILG education and outreach program and Clearwater to communicate with members	Regional Board determines whether exceedances trigger discharge limitations for those properties within the Responsibility Area represented by the monitoring site
Continued monitoring and evaluation of progress through Farm Evaluation Surveys and sampling	For confirmed exceedances, VCAILG notifies Members that discharge limitations apply and they must select Track 1 or Track 2 to comply

Ventura County Watersheds with Nutrient Related TMDLs

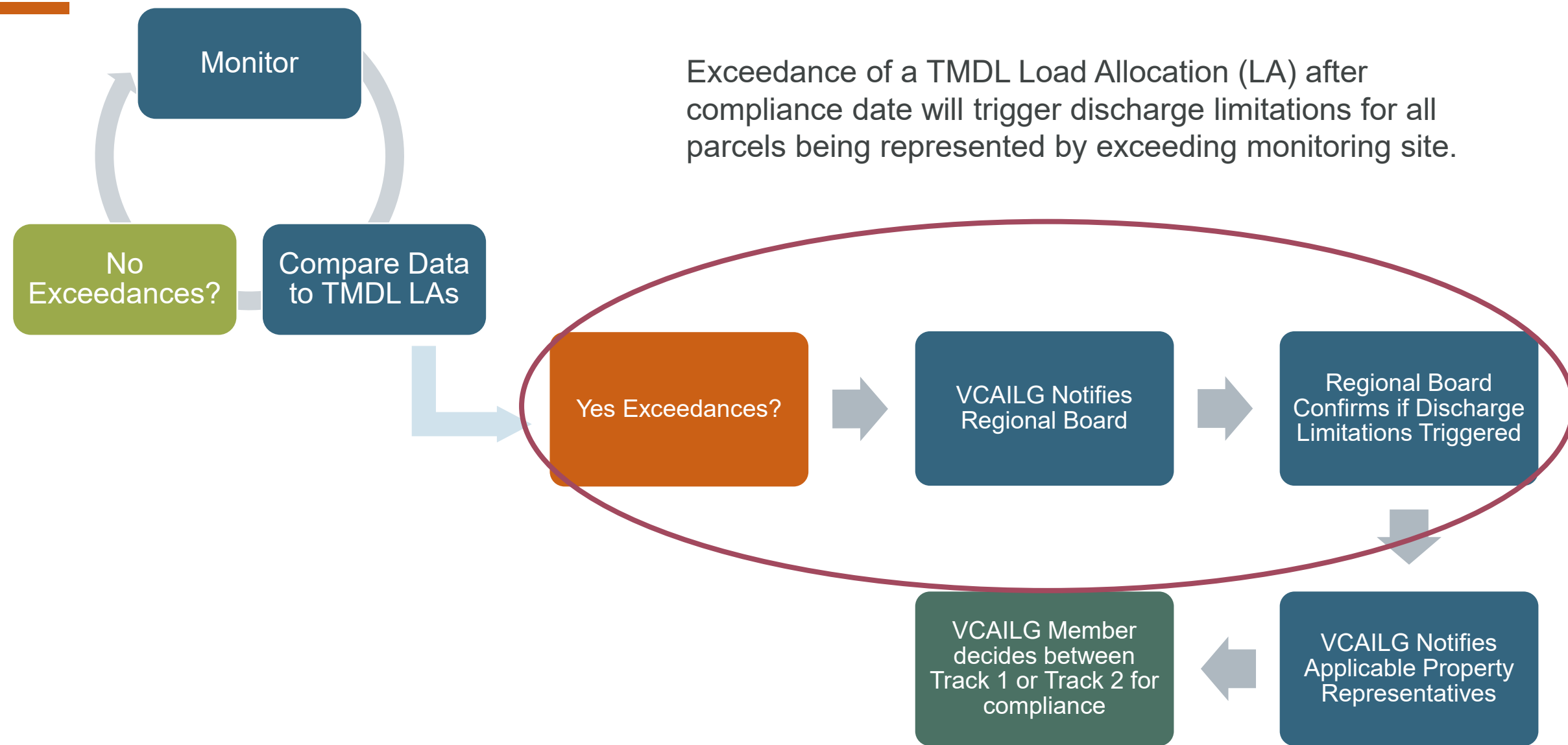


Nutrient Related TMDLs

TMDL	Constituents	Load Allocation/Benchmark
Ventura River Algae	Nitrate-N + Nitrite-N (storms)	5 mg/L (upper watershed) 10 mg/L (lower watershed)
	Total Nitrogen (dry weather) Total Phosphorus (dry weather)	16 lbs/day or 0.008 lbs/day/ac 0.12 lbs/day or 0.000063 lbs/day/ac
Calleguas Creek Watershed Nitrogen	Nitrate-N + Nitrite-N	9 mg/L
Santa Clara River Nitrogen	Ammonia-N + Nitrate-N + Nitrite-N	10 mg/L
Malibu Creek Watershed Nutrients	Nitrate-N + Nitrite-N (winter)	8 mg/L
	Total Nitrogen (summer)	3 lbs/day
	Total Phosphorus (summer)	0.2 lbs/day
Malibu Creek and Lagoon TMDL for Sedimentation and Nutrients	Total Nitrogen	0.65 mg/L (summer) 1.00 mg/L (winter)
	Total Phosphorus	0.1 mg/L

Watershed	TMDL Constituents	Ag Order Compliance Date
Ventura River Watershed	Algae	2019
	Trash	2010
Santa Clara River Watershed	Nitrogen	2004
	Bacteria (Reach 3 and 5)	2023 (dry) March 21, 2029 (wet)
	Toxaphene (Estuary)	October 7, 2025
	Chloride (Upper Santa Clara River)	2010
Calleguas Creek Watershed	Nitrogen	2010
	Toxicity, Chlorpyrifos, Diazinon	2016
	Metals and Selenium	2022
	Boron, Chloride, Sulfate, TDS (Salts)	2023
	OC Pesticides and PCBs	March 24, 2026
	Siltation	2015
	Trash (Revolon Slough, Beardsley Wash)	2010
Oxnard Plain/ Coastal Watershed	OC Pesticides and PCBs (McGrath Lake)	2021
	Pesticides, PCBs, and Sediment Toxicity (Oxnard Drain #3)	April 14, 2026
Malibu Creek Watershed	Nutrients	2022
	Sedimentation and Nutrients	2022

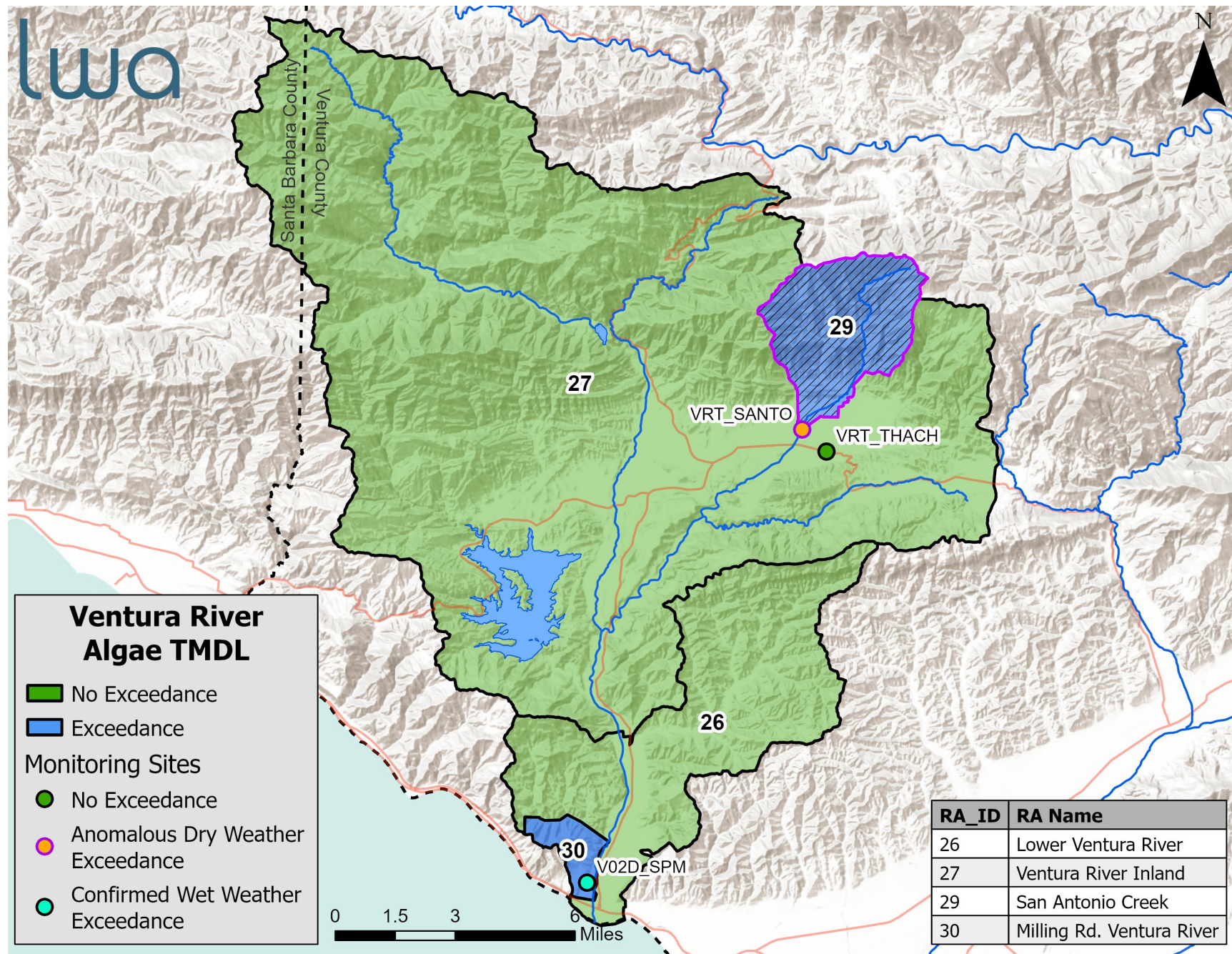
TMDL Monitoring and Response Process





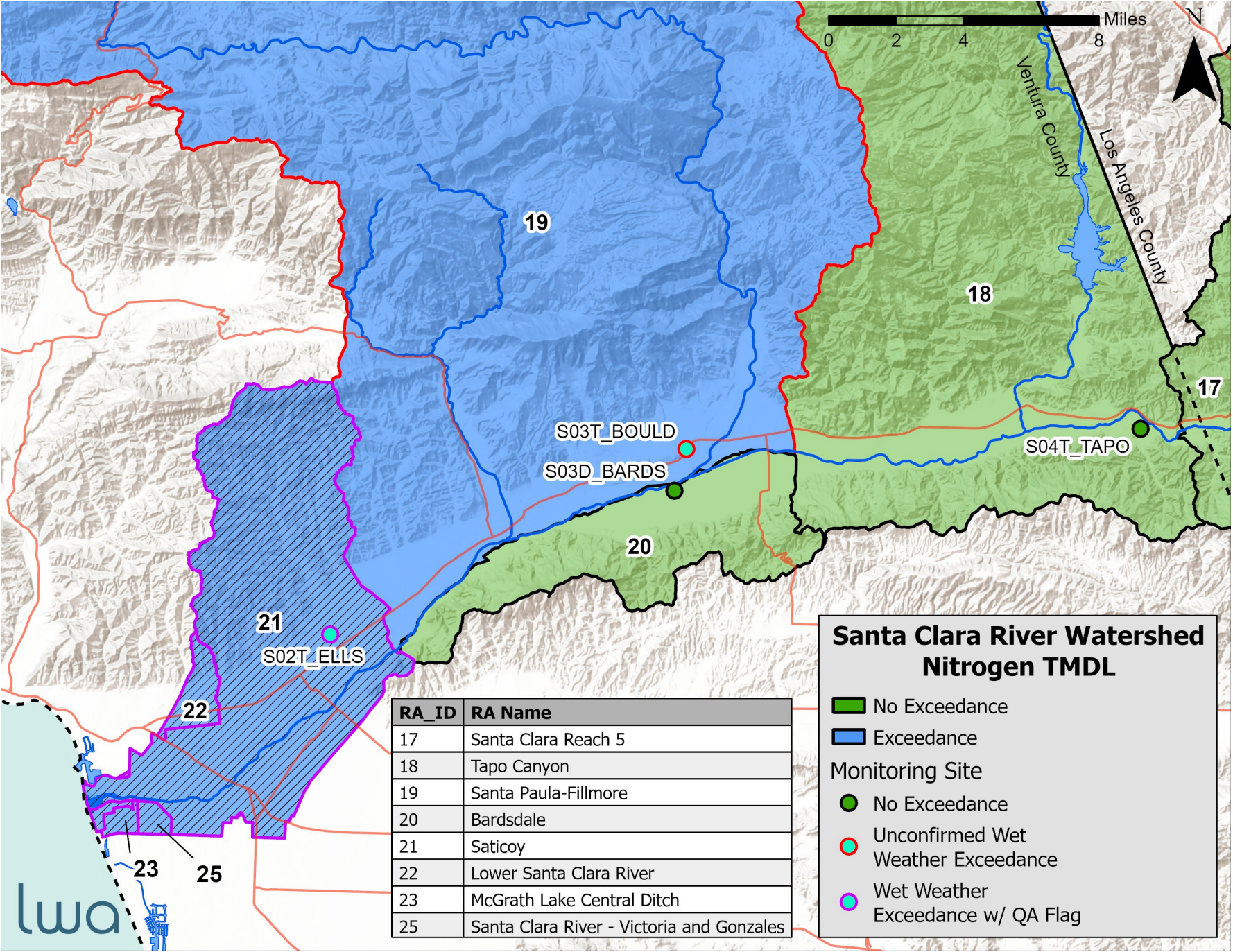
Ventura River Algae TMDL Load Allocations

- 5 or 10 mg/L Nitrate-N + Nitrite-N: Wet Weather
- 16 lbs/day or 0.08 lbs/day/ac Total N: Dry Weather
- 0.12 lbs/day or 0.000063 lbs/day/ac Total P: Dry Weather



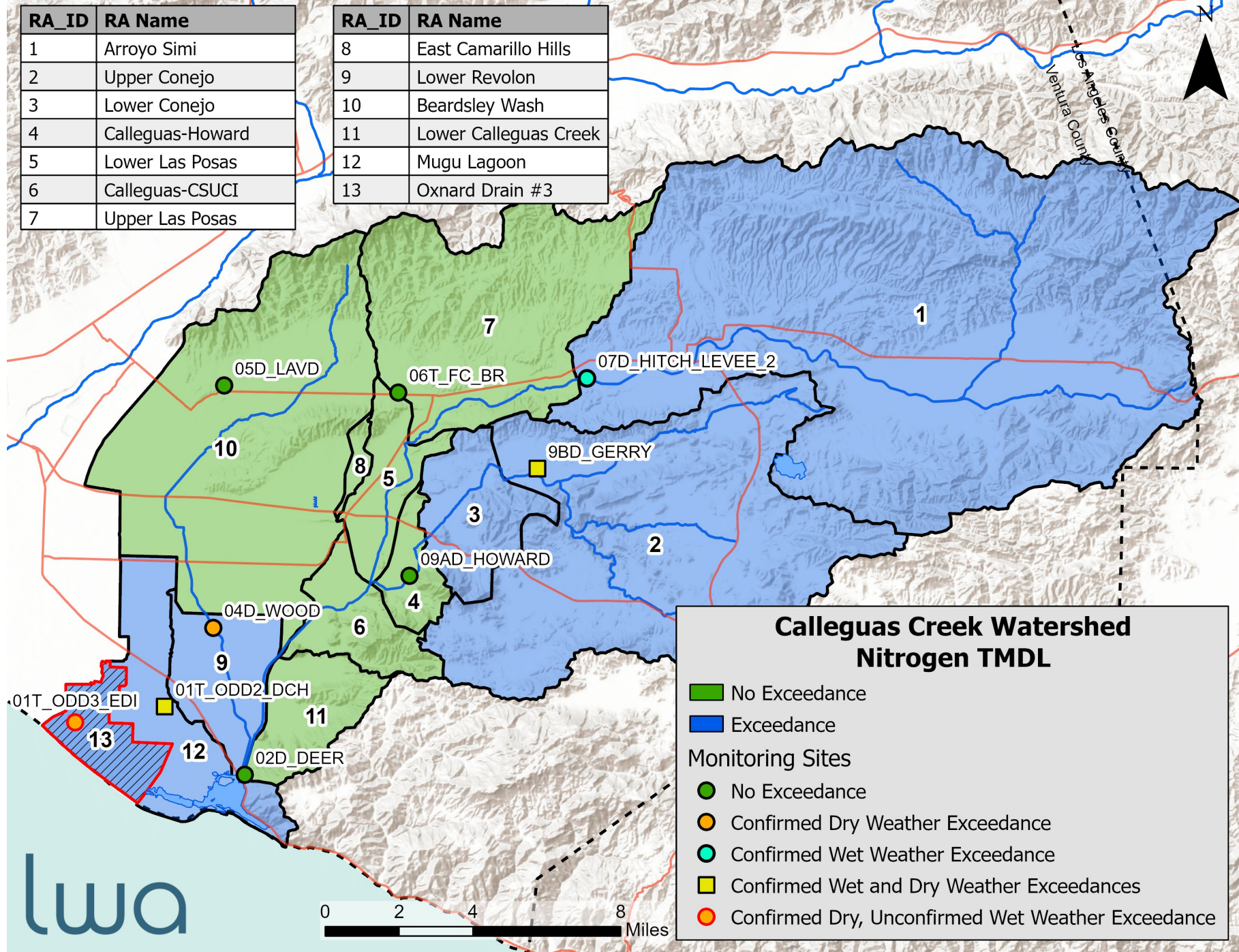
Santa Clara River Nitrogen TMDL
Load Allocation

10 mg/L Ammonia-N + Nitrate-N +
Nitrite-N



Calleguas Creek Watershed
Nitrogen TMDL

9 mg/L Nitrate-N + Nitrite-N



Malibu Creek Nutrients TMDL

8 mg/L Nitrate-N + Nitrite-N (winter)

3 lbs/day Total Nitrogen (summer)

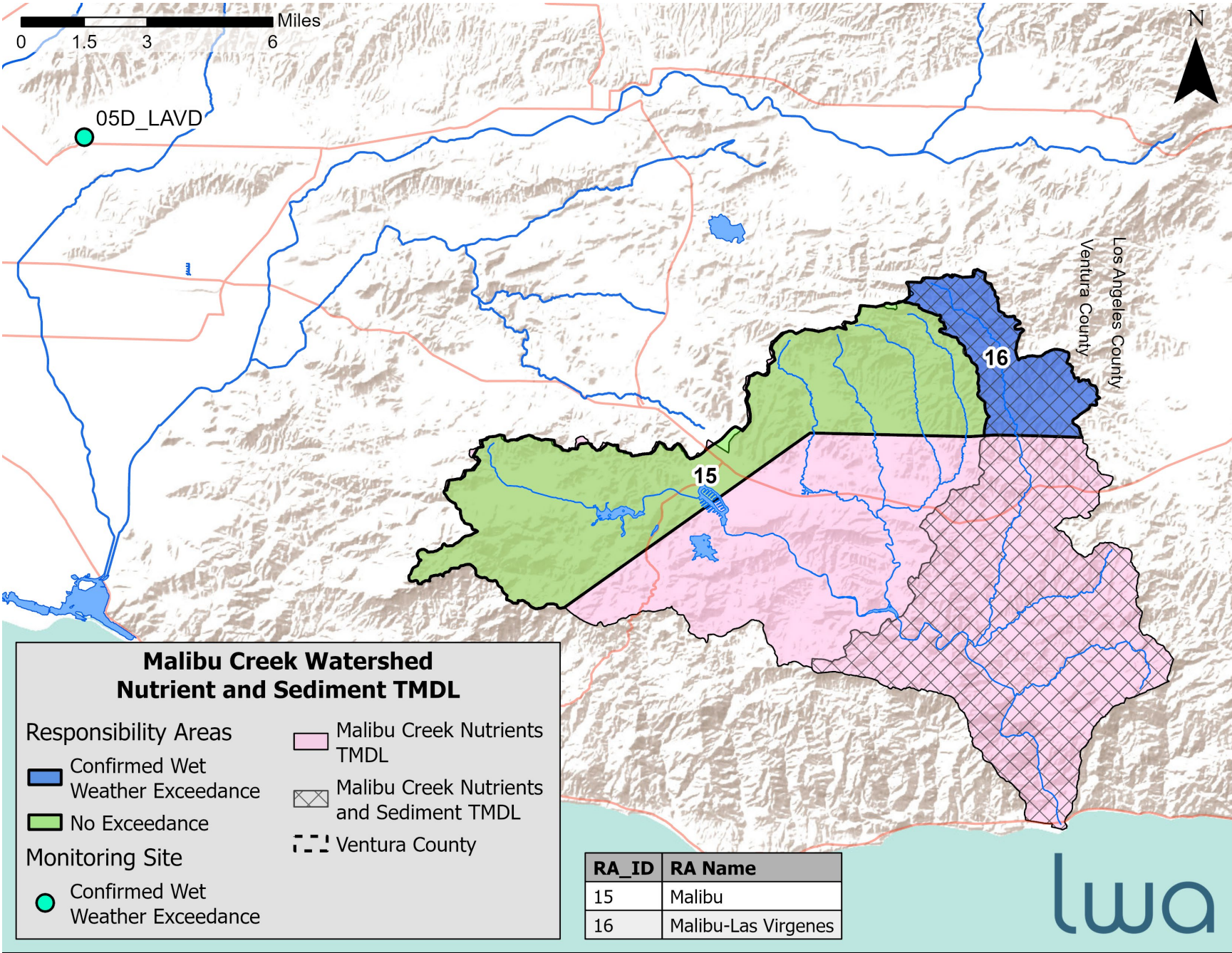
0.2 lbs/day Total Phosphorus
(summer)

Malibu Nutrients and Sediment
TMDL

0.65 mg/L Total Nitrogen (summer)

1.00 mg/L Total Nitrogen (winter)

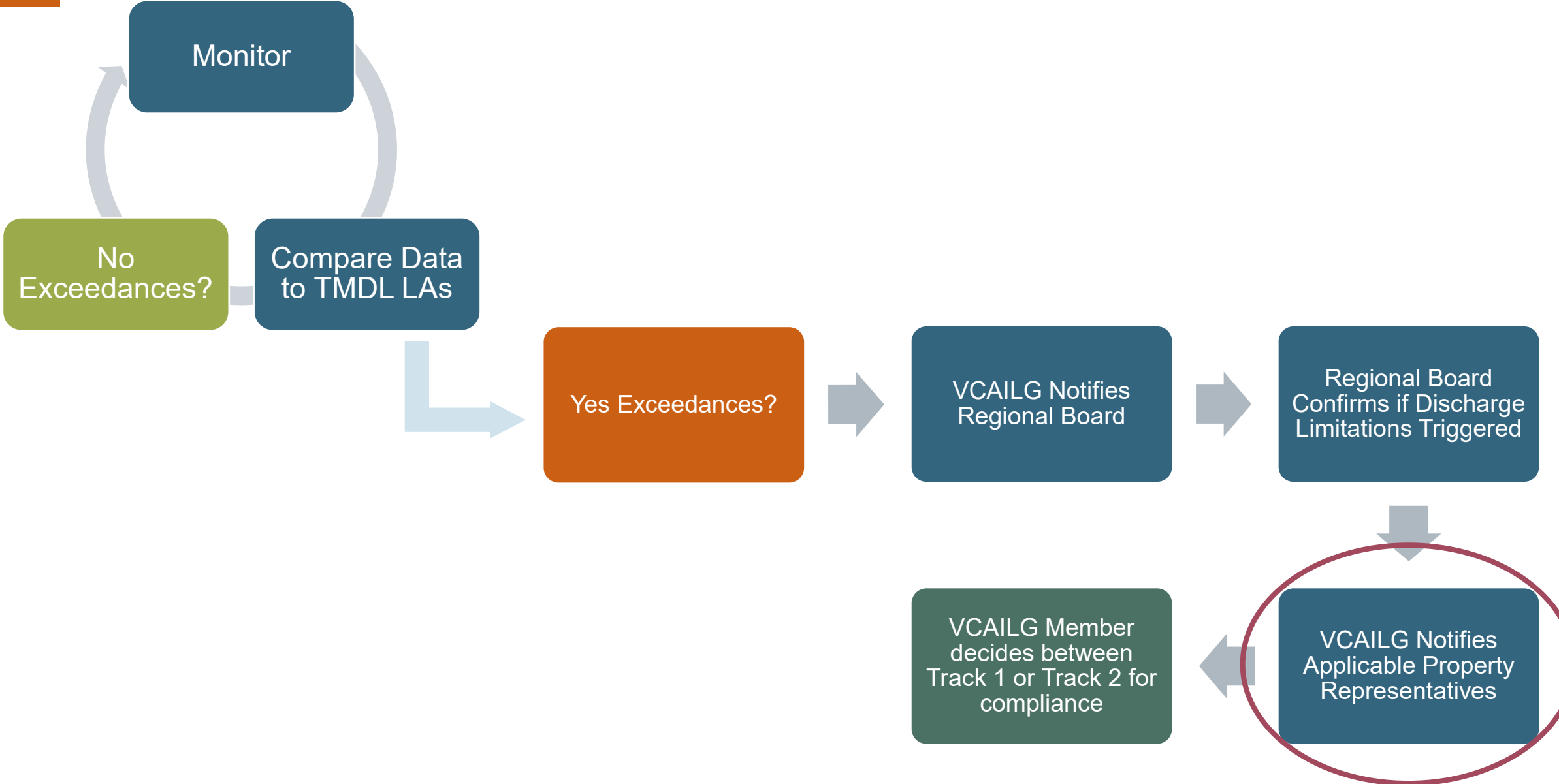
0.1 mg/L Total Phosphorus



What's Next



TMDL Monitoring and Response Process



TMDL Discharge Limitations Triggered Notification Packet

To view your parcel summary, check the letter you received in the mail or log into Clearwater and go to the TMDL tab.



PO Box 3160, Ventura, CA 93006
805-289-0155 / Fax 855-286-8242

Steering Committee

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FivePoint

JARED BOUCHARD
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Cole Ranch

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Laguna Grove Service

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Southland Sod Farms

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Underwood Ranches

LARRY YEE
Former Director, UC Cooperative Extension - Ventura

February 24, 2025

REGIONAL BOARD REQUIRED NOTICE OF DISCHARGE LIMITATIONS
TRIGGERED BY CALLEGUAS CREEK WATERSHED NITROGEN AND
TOXICITY, CHLORPYRIFOS, AND DIAZINON TMDLS

Dear <landowner or grower name>,

This letter serves as an important notice of additional compliance requirements for one or more parcels you own or operate. On September 28, 2023 the Los Angeles Regional Water Quality Control Board (Regional Board) adopted General Waste Discharge Requirements for Discharges from Irrigated Agricultural Lands within the Los Angeles Region (Order R4-2023-0353, Ag Order). Our records indicate that one or more of your parcels is located within the Mugu Lagoon area of the Calleguas Creek Watershed; an impaired waterbody subject to the Calleguas Creek Nitrogen and Related Effects Total Maximum Daily Load (CCW Nitrogen TMDL) and the Calleguas Creek Watershed and Mugu Lagoon Toxicity, Chlorpyrifos, and Diazinon Total Maximum Daily Load (CCW Toxicity TMDL).

TMDLs (Total Maximum Daily Loads) are regulatory plans designed to reduce pollutant loads to impaired waterbodies and restore their beneficial uses. TMDL plans evaluate all sources of a pollutant (urban, industrial, wastewater treatment, agriculture, etc.) and set load allocations and compliance requirements for each source type to collectively achieve attainment of water quality standards. TMDL requirements have been incorporated into the Ag Order, requiring action from agricultural landowners and operators when TMDL allocations are exceeded after the applicable compliance deadline.

On December 6, 2024, the Regional Board notified VCAILG of their determination that nitrate-N + nitrite-N and chlorpyrifos at the 01T_ODD2_DCH VCAILG monitoring site during wet and/or dry weather sampling exceeded the allowable water quality load allocations. This exceedance triggered discharge limitations for the agricultural parcels located within the Mugu Lagoon Responsibility Area. Please refer to the attached map. The recent TMDL allocation exceedances of the CCW Nitrogen TMDL after its July 16, 2010 compliance date as well as the exceedance of the CCW Toxicity TMDL after its March 24, 2016 compliance date mean that individual discharge limitations—specific to the exceeding TMDL water quality constituent—now apply to your farm(s).

Under the Ag Order, you are required to:

1. **Select a Compliance Track** – Choose Track 1 (individual Monitoring and Reporting Plan) or Track 2 (farm-level Management Practice Plan), as outlined in Ag Order Appendix 3, Section 3.2.c.
2. **Submit a Notice of Intent (NOI)** – The enclosed NOI form must be completed, signed by the landowner, and submitted to the Regional Board within two months of this notification. Please keep in mind when making your track selection that, per direction from Regional Board staff, this choice may be irreversible, except in cases of changing landownership.

Both landowners and lessee growers are receiving this notice; however, only one compliance track selection can be submitted per parcel. To assist you, the attached packet includes:

- Attachment A: Your Parcels in the TMDL Area
- Attachment B: CCW Nitrogen TMDL and CCW Toxicity TMDL Exceedance Notification Packet, which includes:
 - Timelines and requirements for both Track 1 and Track 2 compliance options.
 - A map of the Mugu Lagoon Responsibility boundary.
- Attachment C: Resources for questions, technical assistance, and management practice recommendations.
- Attachment D: Frequently Asked Questions
- The required NOI form to be submitted to the Regional Board.

To further help you navigate these requirements, please log into the Clearwater platform, where you can access a list of your parcels subject to the TMDLs and submit your NOI form. Clearwater will guide you through the compliance pathways for each parcel and help you track deadlines. If you encounter any issues accessing your Clearwater login credentials, please reach out to VCAILG to request assistance. Video tutorials are also available within the Clearwater TMDL module to help you navigate the platform.



If you believe that the drainage from your farm or ranch has been incorrectly characterized as discharging to or being within the Mugu Lagoon Responsibility Area, please contact the Regional Board using the contact information provided below.

We understand that navigating these compliance requirements are complex, and we encourage you to review the provided resources to facilitate your decision-making process. While VCAILG is committed to supporting our enrollees and welcomes any questions related to this notification or the general requirements, please note that questions related to regulatory specifics, the NOI form, or implications of compliance track choices, should be directed to the Regional Board. You may contact Regional Board staff at 213-878-7906 or via email at rb4-irrigatedag@waterboards.ca.gov.

For additional support, you are invited to a forum with Regional Board staff, scheduled as follows:

Date: March 10, 2025

Time: 10:00 a.m. to 12:00 p.m.

In-Person Location: United Water Conservation District Board Room, 1701 N. Lombard Street, Oxnard

Zoom Link: Go to join.zoom.us and enter Meeting ID: 813 4328 4659 and Password: 747547

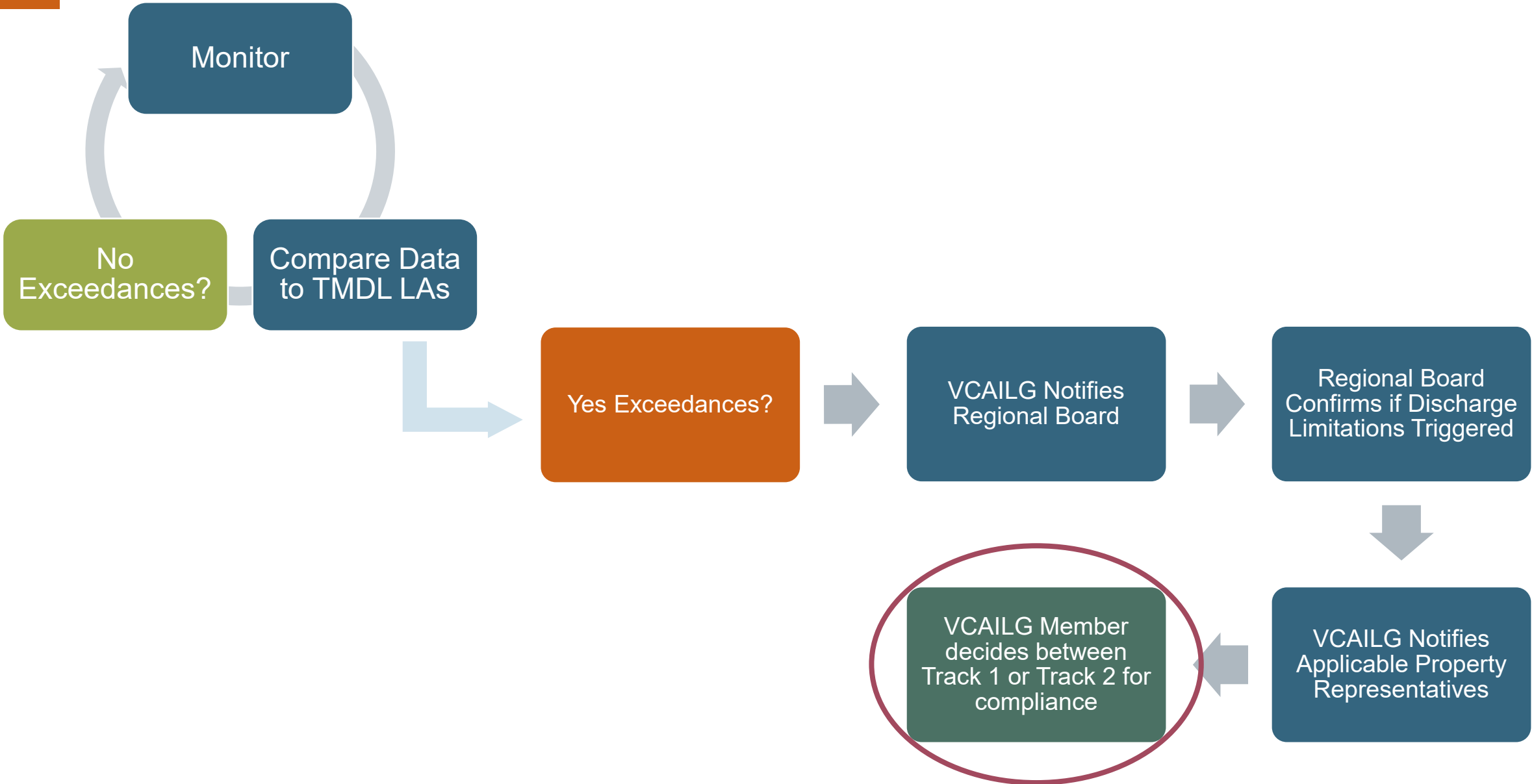
Sincerely,

VCAILG

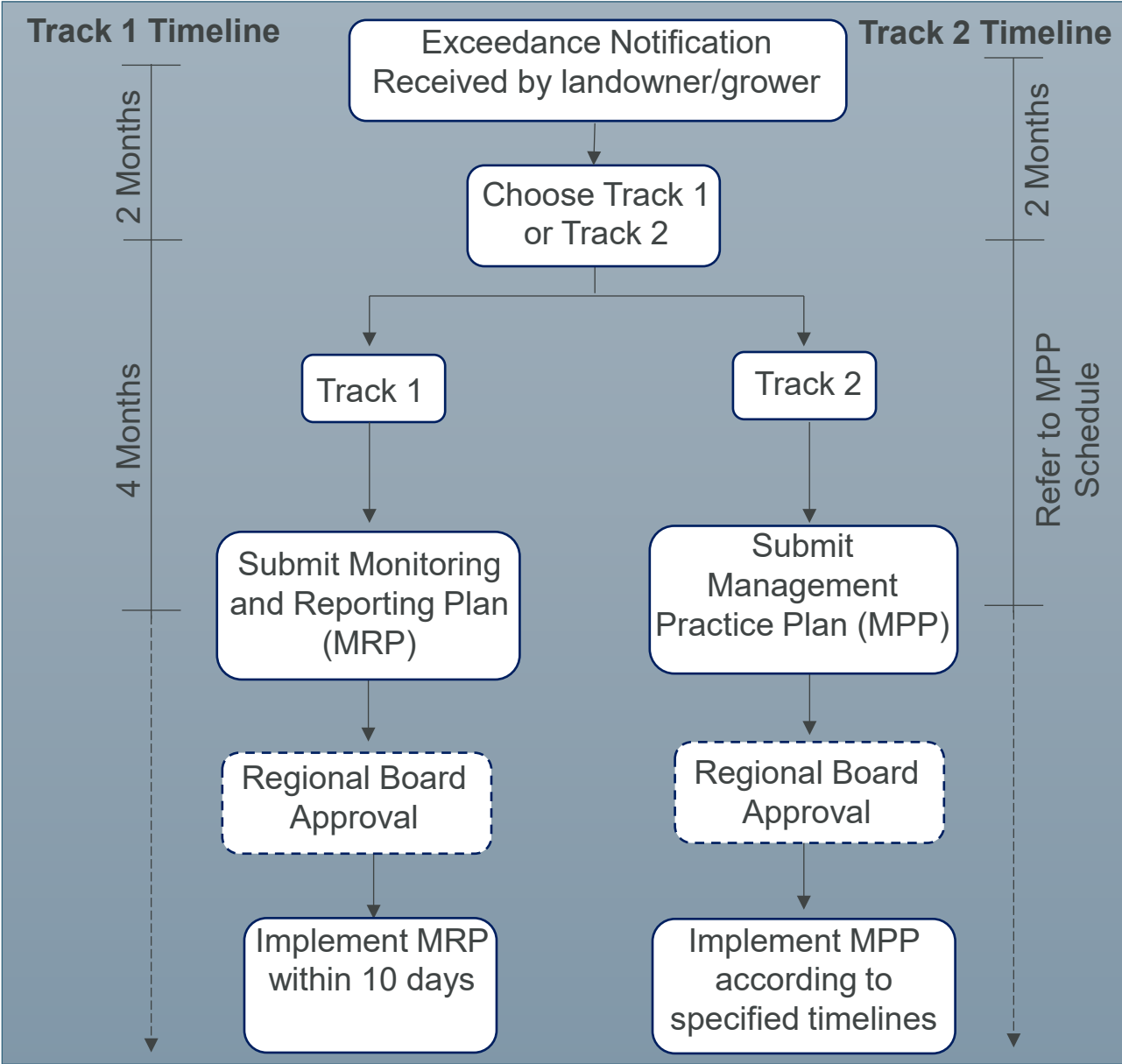
5156 McGrath St., Suite 102
Ventura, CA 93006
Vcailg@farmbureauvc.com
805-289-0155

Para obtener una copia de esta carta en español, por favor contacta a Danielle Padilla en VCAILG@farmbureauvc.com al (805) 289-0155.

TMDL Monitoring and Response Process



Timeline from TMDL Discharge Limitation Notification Received



Refer to discharge limitation notification packet or Clearwater

Track 1 or Track 2?

Following a TMDL exceedance after the deadline: Growers within the area being represented by the exceeding monitoring site are subject to discharge limitations upon confirmation by the Regional Board and notification by VCAILG. Growers must comply by either of the following pathways.

Track 1: Individual Monitoring and Reporting Plan (MRP) (default compliance pathway)

Develop farm-specific MRP.

Upon approval, collect samples on-farm at discharge locations.

Receive results and compare to the TMDL load allocation(s)/ discharge limitations.

Produce and submit Annual Monitoring Reports to the Regional Board.

Compliance is determined based on monitoring results meeting the discharge limitations.

* You may face enforcement action for exceeding discharge limitations. Management practices (MPs) would still be required if discharge limitations aren't achieved.

Track 2: Management Practice Plan (MPP) (opt-in alternative compliance pathway)

Develop farm-specific MPP to detail practices to reduce or eliminate discharges of TMDL constituents.

Plan must be developed by a Technical Service Provider.

Plan reviews existing conditions, practices, recommends additional MPs, if necessary.

Demonstration that existing and planned MPs will meet TMDL.

Includes implementation schedule and milestones.

Plan for operation and maintenance must be included to ensure long-term effectiveness.

Upon approval, implement plan according to schedule.

*Timeline for categories of practices set in Ag Order. May explain and request alternative timeline in MPP.

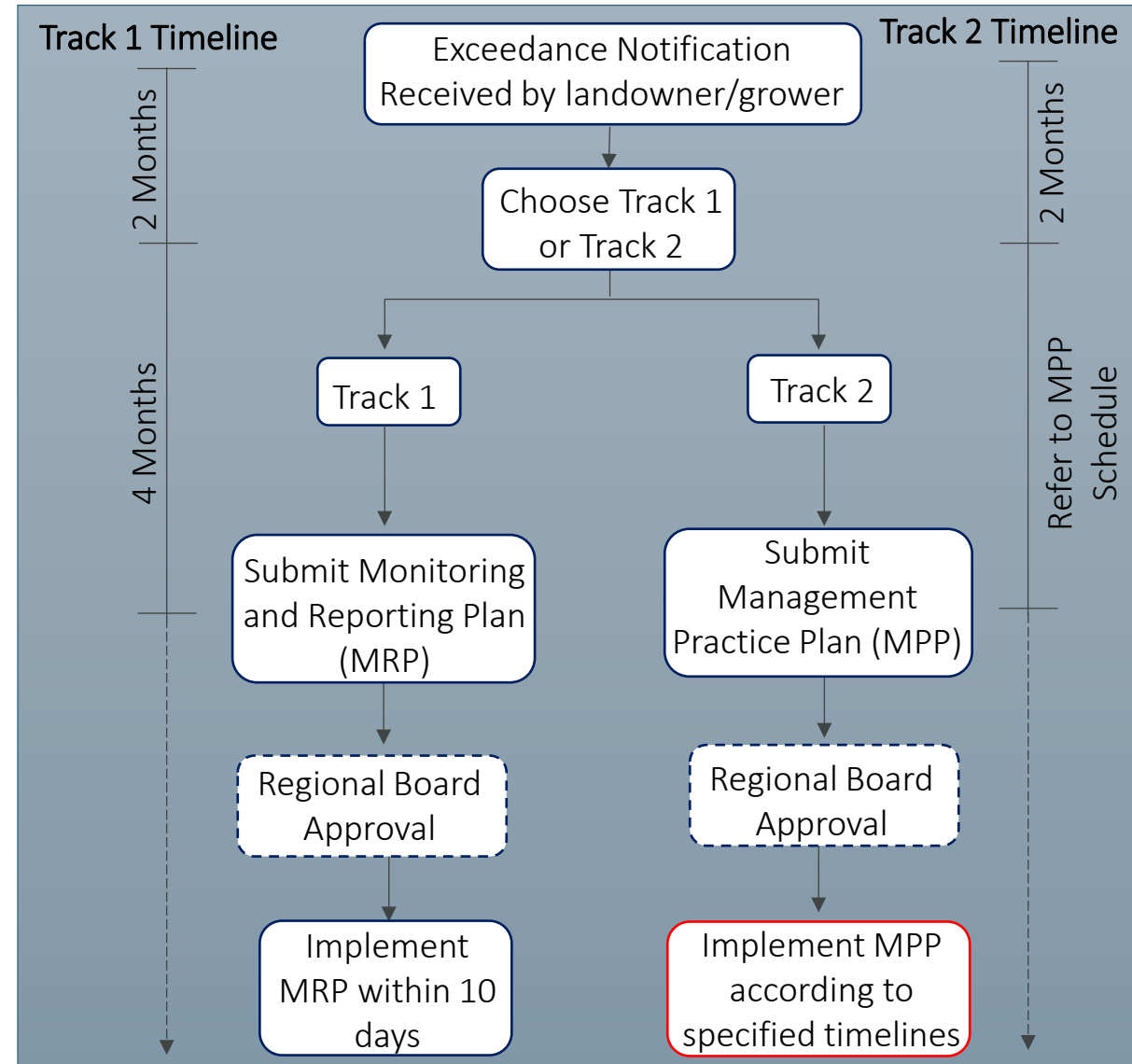
Track 1 and Track 2 Timelines

Track 2 MPP Implementation Timeline

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

5 months (7 S.D.)	Vegetative practices (e.g., filter strips, grassed waterways, cover crop, etc.)
8 months (11 S.D.)	Structural non-treatment practices (e.g., detention basins, etc.)
15 months (18 S.D.)	Structural treatment practices (e.g., engineered wetlands, bioreactors, tailwater recovery, etc.) and regional projects

*Additional implementation time must be requested in MPP



Submit Notice of Intent

Notice of Intent to Comply with Individual Discharge Limitation

Instructions: This form may be filled out and submitted by either the lessee grower or the landowner, however, **one form is required per landowner entity and each form must be signed by an authorized signatory of the landowner.** Fill out this form in its entirety, all fields are required unless otherwise noted. **Incomplete forms will not be accepted and may result in enforcement.** Completed form(s) are due two months after Notification of Exceedance from the Ventura County Agricultural Irrigated Lands Group (VCAILG).

Section 1: Enrollee Information

(to be completed for the landowner or lessee grower Enrollee who is filling out and submitting the form)

Name:

Business or Farm Name:

Mailing Address:

Farm Address (if available):

Email Address:

Phone Number:

VCAILG ID:

Please select if you are the landowner or lessee:

☐ Landowner ☐ Lessee

If you are the lessee, provide the landowner's name:

Is the enrollee (or at least one owner of the enrolling parcel(s)) a member of a socially disadvantaged group as defined by AB-1348 Farmer Equity Act of 2017?¹

☐ Yes ☐ No

Section 2: Affected Parcel(s) Information

Exceedance Notification date from VCAILG (date on letter):

APN10 of Parcel Subject to Individual Discharge Limitations	Applicable TMDL (Add the APN10 multiple times if subject to different TMDLs)	Constituent(s) Exceeded	Weather Exceedance occurred (Wet, Dry, or Wet and Dry)

Section 3: Enrollee Standing

Are you an enrollee in good-standing?

To be an enrollee in good-standing you must:

- Be enrolled with VCAILG
- Be up-to-date on educational credits (2 hours per year)
- Be up-to-date on the Farm Evaluation Submittal
- Be current on Irrigation and Nutrient Management Report (INMR) submittal (beginning March 2026)

☐ Yes, I am an enrollee in good-standing

☐ No, I am not an enrollee in good-standing (if you are not an enrollee in good-standing, Track 2 is not an option. If you would like to choose Track 2, work with VCAILG to become in good-standing before the submittal due date of this form)

Section 4: Track 1 or Track 2 Selection

I choose to demonstrate compliance with the discharge limitation(s) by implementing:

☐ Track 1: implementing an individual Monitoring and Reporting Plan to directly demonstrate that applicable discharge limitations are being met at edge of field compliance point(s).

☐ Track 2: implementing a farm-level Management Practice Plan certified by a qualified professional that implementation of the selected management practices in the plan is assured of meeting discharge limitations. I understand that an enrollee will only be deemed in compliance with the discharge limitation via Track 2 if the enrollee was engaged in the adaptive management process described in Appendix 3 Section 3.4.4 of Order No. R4-2023-0353. **Track 2 is only available to enrollees in good-standing.**

Section 5: Certification

"I certify under penalty of law that to the best of my knowledge and belief, this document and any attachments submitted are, true, accurate, and complete and were prepared by me or under my direction or supervision. I am aware that there are significant penalties for knowingly submitting false information."

Landowner Signature _____ Date _____

Form Submittal Instructions

Assistance with this form may be obtained by contacting the Los Angeles Water Board, Phone: (213) 878-7906

Complete and sign pages 1 and 2 of the *Notice of Intent to Comply with Individual Discharge Limitation* Form and submit either:

- Via email to: rb4-irrigatedag@waterboards.ca.gov, cc: vcailg@farmbureauvc.com, or
- Via mail to: CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD, LOS ANGELES REGION
ATTN: Irrigated Lands Regulatory Program 320 W. 4th Street, Suite 200 Los Angeles, CA 90013

¹ AB-1348 Farmer Equity Act of 2017 defines "Socially disadvantaged group" as a group whose members have been subjected to racial, ethnic, or gender prejudice because of their identity as members of a group without regard to their individual qualities. These groups include all of the following:

- (1) African Americans.
- (2) Native Indians.
- (3) Alaskan Natives.
- (4) Hispanics.
- (5) Asian Americans.
- (6) Native Hawaiians and Pacific Islanders

Notice of Intent (NOI) form can be submitted to the Regional Board via hard copy or generated through Clearwater and then submitted to the Regional Board via mail or email.



Resources



Resources for TMDL Compliance

We've compiled helpful resources that provide more information on TMDL requirements, including:

- **Summary of Track 1 and Track 2 Requirements and Deadlines**
- **Workshop Recordings:** Watch past workshops where VCAILG explains TMDL and Ag Order requirements in detail. Recommended recordings include:
 - March 10, 2025: TMDL Notification Workshop
 - August 19, 2024: TMDL 101 Workshop
 - Agricultural Water Quality Requirements and VCAILG
- **Technical Service Provider List:** Find a non-comprehensive list of consultants and agencies that can assist with TMDL compliance.
- **Regional Board Resources:**
 - Track 1 MRP Template
 - Track 2 MPP Template
- **Clearwater login page:** Log in to Clearwater to access the TMDL tab, check for triggered TMDLs affecting your parcels, generate NOIs, and track deadlines.
- **Ag Order Appendix 3, Section 3:** Review the official requirements for TMDL compliance as outlined in the Agricultural Order

FAQ's



Thank You

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lwa

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ASSOCIATES