Interview Findings and Recommendations

Development of a General Agricultural Order for the San Diego Region
July 29, 2015

This document summarizes the findings and recommendations from a series of interviews conducted by the Center for Collaborative Policy (Center), CSU Sacramento, in preparation for providing facilitation support to the San Diego Regional Water Quality Control Board (Board) for a series of stakeholder meetings on an Administrative Draft of a *Tentative General Waste Discharge Requirements for Commercial Agriculture and Nurseries within the San Diego Region (Tentative Order)*. The author, Dr. Dorian Fougères from the Center, retains responsibility for any statements that interviewees may feel are mischaracterizations or errors. The author may be reached at dfougeres@ccp.csus.edu or (916) 531-3835.

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1. Interview Process and Interviewees

- The interview process served three purposes: (1) Obtain candid feedback from stakeholders regarding the Admin Draft of the Tentative Order. (2) Help the Center and Board plan for and facilitate corresponding stakeholder meetings on the Administrative Draft of the Tentative Order. (3) Lead to a better General Agricultural Order.
- The interview process was designed primarily as a qualitative assessment, with efforts made to interview at least one representative of various interest areas, including irrigated lands monitoring groups, agriculture and farming, water supply, county government, municipal government, and conservation districts.
- Thirteen interviews were conducted between May 12 and July 29, approximately half in-person and half by telephone.
- Interviewees included (listed alphabetically by last name):
    1. John Adriany, San Mateo Irrigated Lands Group
    2. Ben Drake and Justin Haessly, Rancho California Water District
    3. Kourtney Drake, Upper Santa Margarita Irrigated Lands Group

4. John Flores, San Pasqual Band of Mission Indians
5. Cathryn Henning, San Diego Roots Sustainable Food Project, and Wild Willow Farm and Education Center
6. Steve Horn, Riverside County Executive Office
7. Tom Kennedy, North County Irrigated Lands Group and Rainbow Municipal Water District
8. Mo Lahsaie, City of Oceanside
9. Eric Larson, San Diego Irrigated Lands Group and San Diego County Farm Bureau
10. Judy Mitchell, Mission Resource Conservation District
11. Toby Roy, San Diego County Water Authority
12. John Snyder, Riverside County Ag Commissioner
13. Nancy Stalnaker and Ryan Wann, San Diego County Watershed Protection Program and Ag Commissioner
14. Kathleen Thuner, former SDC Ag Commissioner
15. Charley Wolk, Bejoca Grove and Landscape Management, and San Diego Irrigated Lands Group

- Interviews used a standard list of 8 questions.
- Interview notes are confidential. Findings are shared here without attribution.
- Findings are not presented in order of importance, although generally are presented in order of those that were most common to least common. They are grouped where possible. In some cases prominent findings are deliberately repeated in different sections to illustrate connections.
- The following scale is used to characterize findings.
    - "Nearly all": indicates that 12-14 interviewees responded in this way
    - "The majority": indicates that 8-11 interviewees responded in this way
    - "Several": indicates that 5-7 interviewees responded in this way
    - "A few": indicates that 2-4 interviewees responded in this way
    - A single response is typically noted as an example, or otherwise not preceded by one of the above terms.
- The draft findings underwent review by interviewees and Board staff.
- This revised (but still draft) version is incomplete insofar as two additional interviews are planned but not complete. These draft findings are available for interested stakeholders at this time. A final version will be made available to stakeholders once the additional interview is complete, and no later than August 17, 2015.

2. Drivers and Trends of Agriculture within the Board's Jurisdiction

1. Nearly all interviewees noted that the cost of water was the primary driver of agriculture in San Diego and Riverside Counties.
2. Several interviewees noted that limitations on the supply of water, the cost of labor, and continuing increases in regulation were important drivers of agriculture.
3. A few interviewees noted that salinity, international competition, invasive species, and climate change were important drivers of agriculture.
4. The majority of interviewees noted that while the region was historically famous for its large number of small farms, the increase in the number of "microfarms" (variously including "hobby farms" and/or small plots cultivated on residential properties and ranchettes) was an important trend in San Diego and Riverside Counties.
    a. A few interviewees felt that the loss of such small farms due to costly water and regulatory requirements was a countervailing trend.
    b. A few interviewees felt that the loss of farms in general, including nurseries, due to costly water and associated drought was another countervailing trend in their area.
5. Several interviewees felt that the increase in the number of organic farms, direct sales at farmers' markets, and attention to buying locally-grown produce were important trends.
6. The majority of interviewees felt that the reduction in and careful application of water was an important trend, largely because the cost of water.
7. A few interviewees noted that the proliferation of "checkbook irrigation" – limiting irrigation based on what one can pay for water, rather than what is needed for a crop – was an important trend.
8. Several interviewees felt that the reduction in and careful application of fertilizers was an important trend, largely because this was a sound business decision.
9. Several interviewees felt that the reduction in and careful application of pesticides was an important, long-standing trend, largely because of pesticide use reporting requirements implemented in San Diego County in the 1980s.
10. Several interviewees felt that the aging of farmers, with a large proportion now 60 years or older, and difficulty in recruiting a younger generation of farmers, were important, inter-linked trends.
11. In southwest Riverside County, a few interviewees noted continuing winery development as an important trend.

3. The Board's Status among Stakeholders

1. Based on the detailed findings that follow, an overall finding is that the Board does not have a strong foundation of credibility or trust upon which to build a new Order.
2. Nearly all interviewees questioned the Board's desire and commitment to address agricultural waste discharges, and felt it was a low priority for the Board.
    a. Several interviewees felt that the renewed attention to the program was based on prompting from the State Water Resources Control Board.
3. Nearly all interviewees criticized the lack of continuity in the staff person assigned to the program, the lack of sustained attention to the program, and the lack of sufficient program funding, which they felt undermined communication, working relationships, and effectiveness.
    a. One interviewee noted that the Board had made past commitments to increasing staffing and funding, but these did not occur.
4. The majority of interviewees felt that the Board had not put monitoring information to use, and hence was only going through the motions of having a program.
5. The majority of interviewees questioned whether the Board, given its organization as a regulatory agency, had the capacity to design a program that would require a high degree of voluntary participation.
6. Several interviewees felt the Board did not have sufficient expertise with agricultural operations to design an effective Order.
7. Several interviewees felt that the Board had designed the earlier waiver and monitoring options to make its own job more convenient, rather than to create a program that was effective.
8. One interviewee noted that the growers in their monitoring group were prepared to share their concerns about program funding and support directly with the board members of the Board, as well as with the state Legislature.
9. Several interviewees noted that they felt the Board had held a good series of stakeholder dialogues in 2014, and felt glad that the Board was choosing again to engage stakeholders in direct dialogue.
10. A few interviewees noted that they thought involving a neutral facilitator was beneficial to helping make sure that concerns were documented and meetings were productive.
    a. One interviewee felt it was important for board members of the Board to be provided with this summary of interview findings.

4. The Use of Science

1. The majority of interviewees felt that baseline conditions were not adequately established with scientific data, nor used to design monitoring requirements appropriate to various watersheds.
2. The majority of interviewees felt that the Board's earlier requirements were inappropriately based on the presumption that agricultural discharges were a significant problem in each watershed. They felt that the causal connections between agricultural waste discharges and water quality in various watersheds were not sufficiently clear to justify the requirements.
    a. Several interviewees noted that they knew of agriculture-related water quality impacts certain watersheds. This included impacts from animals as well as crops to surface water, to groundwater, and to fish and wildlife.
3. Nearly all interviewees felt that the Board needed to examine and clarify the proportional contribution of all rural landowners – including particularly homeowners, as well as golf courses, tribal lands and Caltrans roadways – to water quality conditions in rural areas.
4. The majority of interviewees felt that, in the absence of a clear picture of the proportional contributions of different groups, the Board's earlier waiver was neither fair nor impartial.
5. Several interviewees expressed concern that homeowners could be the primary source of discharge in rural areas because they typically did not have professional training in fertilizer and pesticide application.
6. Several interviewees felt that pesticide use data was a major source of data that should be used to develop a more accurate assessment of likely water quality risks and associated monitoring in a given watershed.
7. Nearly all interviewees felt that the Board needs to require (where possible), integrate and analyze monitoring data from all sources in the watershed – including large and small farmers, rural homeowners, golf courses, tribal lands, and Caltrans roadways, as well as municipalities and (for the Santa Margarita River watershed) Camp Pendleton – to appropriately regulate both agricultural waste discharges and municipal storm water.
    a. A few interviewees emphasized that the data from individual monitoring sites needed to be analyzed not only in isolation, but at a watershed scale to make sense of larger trends.
8. A few interviewees suggested that the Board should have the monitoring groups' monitoring plans reviewed by experts, whether internal or contracted, to ensure the results will be scientifically rigorous.
9. A few interviewees questioned whether the scale of monitoring in some watersheds would be large enough to be scientifically meaningful.

10. A few interviewees expressed concern that the Board's monitoring requirements were driven more by cost considerations (i.e., what a group could pay for) than data and clear questions.
11. The majority of interviewees felt that best management practices were an effective tool for addressing potential or actual water quality concerns.
    a. A few interviewees felt that the efficacy of some best management practices was unproven.
12. Several interviewees felt that the Board's overall timeline for gathering, analyzing, and using monitoring data to improve water quality throughout the region, was protracted and would not provide for water quality improvements in a reasonable timeframe.

5. Threshold for Enrollment

1. The majority of interviewees emphasized that a clear rationale needs to be provided for whatever criterion or criteria are used to establish a threshold for enrollment.
2. Several interviewees noted that there is a tension between setting a threshold so low that it drives many small farmers out of business, and setting a threshold so high that it leaves out many small farmers who collectively make significant discharges.
3. Regarding the use of farm gate sales, there was no consensus on an appropriate value, other than that $1,000 is too low. Other suggestions ranged from $5,000 to $20,000.
    a. A few interviewees noted that setting a high threshold like $10,000 would prompt some farmers to try and report lower sales to avoid regulation. In this context, the mechanism that the Board would use to verify sales was unclear, and verification might not be possible, thus undermining the effort.
4. Several interviewees felt that farm gate sales and acreage could be misleading criteria because the variability in crop prices and farming practices. High sales or large acreage do not necessarily correlate with a high potential for water quality impacts.
5. The majority of interviewees suggested that a combination of criteria should be used. For example, combining farm gate sales with the type of farm (e.g., vineyard, hothouse, nursery, field crop, fruit trees), with the type of farm being a proxy for typical fertilizer and pesticide use; or combining sales or with the acreage farmed, or with the amount of water or pesticide used.
6. Several interviewees suggested that the combination of criteria chosen should be designed to gauge the risk of water quality impacts. For example, combining the type of farm with soil erosivity and dominant farming practices (e.g., organic standards, tilling practices).
7. One interviewee suggested basing the threshold on whether someone used an agricultural water rate, with this being a proxy for the significance of their farming effort (although water districts have different criteria for whether someone is eligible for such a rate).
8. The majority of interviewees suggested that there be tiers of requirements based on farm gate sales or risk of water quality impacts. For example, one interviewee suggested that if farm gate sales were between $5,000 and $20,000, the farmer should only be required to self-certify their use of BMPs, conduct annual inspections, report, and permit random audit by the Board; farmers with sales greater than $20,000 would be required to join a monitoring group.
9. Several interviewees stressed that if the threshold is too high, there will be too few farmers in the monitoring groups to cover the costs. A combination of large and small growers allows for a broader funding base, with smaller fees for smaller growers.

6. Encouraging Enrollment

1. Based on the detailed findings that follow, an overall finding is that the Board is no longer viewed as a credible enforcer of agricultural waste discharge requirements.
    a. For context, the majority of interviewees indicated that, during the establishment of the preceding Ag Waiver, they had believed that the Board would strongly and effectively enforce compliance and participation in a monitoring group.
2. Nearly all interviewees felt that the low enrollment was primarily due to the lack of enforcement.
3. The majority of interviewees noted that additional reasons for low enrollment included the lack of dedicated resources for both outreach and enforcement, the lack of incentives for participation in the program, and the lack of program partners to support implementation. (See section 8 for more discussion of the importance of partnering.)
4. The majority of interviewees felt that for a future Order to succeed, it must provide a viable option for individual enrollment, particularly for small farmers.
    a. Several interviewees suggested that this could involve provisions for self-certification, self-inspection, and self-reporting – necessarily combined with random audits to ensure accuracy – for farmers whose operations pose a low risk to water quality (however defined as part of the establishment of a threshold and possible tiering of monitoring requirements).
5. Several interviewees noted that overall there was low awareness of the program, and that over time the Board typically only reached those farmers who were already enrolled.
6. Nearly all interviewees felt that formalizing requirements as an Order would not change the level of enrollment if there was no corresponding increase in enforcement.
7. The majority of interviewees expressed concern about the Board's approach to implementing the earlier waiver, which they characterized as creating a strong threat of enforcement but then failing to follow up with substantive action.
    a. Several interviewees noted that taking enforcement action for every grower was not required. A genuine effort to enforce participation in a handful of prominent cases would convey the message that the Board stands behind its program.
    b. A few interviewees stressed that it was not appropriate to ask farmers and monitoring groups to conduct enforcement actions. The Board has the authority and responsibility to do this.
8. Several interviewees mentioned that the Board's historical approach had negatively impacted relations with farmers in several ways.
    a. First, this effectively placed the monetary burden of compliance on those who participated in good faith, while those who declined to participate faced no repercussions and had to pay nothing. Over time this had created a disincentive

for participation, which was reflected in declining enrollment renewals. This also created a widespread sense that the program was unfair.

   b. Along with a lack of feedback on monitoring information that had been gathered (see Section 7, items 8 and 9), this also created a widespread sense that the program was unjust insofar as it imposed a cost without providing any service. Suggested topics for feedback included things like the sufficiency of monitoring plans, Board analyses of monitoring results, conclusions from these analyses, and suggestions for revising monitoring questions and plans accordingly.
   c. Furthermore, this strong push for compliance without follow-up meant that the Board's now had low credibility as an enforcer, and many farmers would adopt a "wait and see" stance before participating in a future Order. This had already happened under the waiver.
   d. Overall, this had increased widespread, unspoken opposition to the program, and farmers were currently very sensitive to the idea of new requirements.
      i. One interviewee noted that the Los Angeles Regional Water Quality Control Board had also not conducted sufficient enforcement, and their program did not succeed.

9. A few interviewees felt that it was not sincere for the Board to say it did not have resources for enforcement or program support, because they knew of no efforts on the part of the Board to obtain some of the acreage fees paid by farmers to the State.
   a. Similarly, a few interviewees felt that some portion of the funds they pay into the state program should be clearly returned to the Board to pay for local program and enforcement expenses.
   b. One interviewee noted that to be fair to farmers, who are paying hundreds of thousands of dollars in compliance costs, the Board must make a significant investment in the program.
10. Several interviewees noted the corresponding need for transparency and accountability if an Order is to have a chance of being effective. Specifically, the justification of any future fee rates would need to be clearly explained, and the Board would have to provide clear documentation of the use of those fees.

7. Monitoring and Reporting

1. As noted in the section on the Board's Status, the majority of interviewees felt that the Board had not put to use the monitoring information that it gathered.
2. As noted in the section on the Use of Science, the majority of interviewees felt that baseline conditions were not adequately established, nor used to design monitoring requirements appropriate to the scope or intensity of demonstrated, agriculturally-based water quality concerns their watershed.
3. As noted in the section on the Use of Science, the majority of interviewees felt that the Board has not established a clear picture of the proportional contributions of different groups. Several interviewees felt that this lack of a complete picture confounded the ability to cultivate shared responsibility for water quality in a given watershed.
4. Several interviewees felt that the Board was inappropriately using the monitoring requirements as a form of discovery to advance its own desire to advance a regional monitoring network, rather than as a tool to address data-based water quality impairments or concerns.
    a. One interviewee expressed concern about the influence of the Southern California Coastal Water Research Project on decisions about what to include as monitoring requirements.
5. Several interviewees felt that the inclusion of biological assessment indicators was unrealistic given the costs of associated lab work, the small number of laboratories available to conduct this type of work, and the lack of established protocols for interpreting these results.
6. The majority of interviewees felt the Board did not do a sufficient job of gathering existing data from other efforts, including municipal storm water monitoring data, and using this information when designing monitoring requirements. The majority felt that the Board was asking for duplicative information, and this was not a good use of their financial resources.
    a. As noted in the section on the Use of Science, nearly all interviewees felt that the Board needs to require (where possible), integrate and analyze monitoring data from all sources in the watershed – including municipalities along with farmers, rural homeowners, tribal lands, and Caltrans roadways – to appropriately regulate both agricultural waste discharges and municipal storm water.
    b. Several interviewees suggested that the Board develop a database to pilot and demonstrate the utility of integrated watershed monitoring, including necessary data sharing protocols.
7. Several interviewees suggested that the Board prioritize the watersheds and sub-watersheds according to where data showed agricultural discharges to be of greatest concern, and tailor the scope and intensity of monitoring requirements according to this prioritization.

8. Several interviewees suggested that the Board needs to share its analyses of monitoring data, to use these analyses to both clarify the goals and questions for monitoring in specific sub/watersheds, and to adjust monitoring requirements over time.
9. Several interviewees expressed concern that the Board had not provided any feedback on their monitoring plans or their monitoring results, leaving them at a loss as to their sufficiency and significance, respectively.
10. Several interviewees felt the Board's lack of sharing its analyses and lack of providing feedback impaired their own ability to communicate to their constituencies the value of their monitoring efforts, and thus negatively affected enrollment.
11. Several interviewees suggested that the Board needs to work with its own divisions and with other agencies to integrate permitting, monitoring requirements and reporting, and inspections where possible, as a cost efficiency measure. Pesticide application, industrial storm water discharge, business licenses, and (presumably in the future) agricultural waste discharge, groundwater management, and food safety were noted as potentially overlapping areas of regulation.
12. Several interviewees felt that monitoring costs were overpriced. Going forward, they felt the Board should provide reference monitoring costs that are based on standard practices and the rates of well-regarded laboratories, to help ensure that farmers paid fair prices for their monitoring work.
13. A few interviewees felt that the total monitoring costs that the Board puts forth should be comparable with other standard services paid for by farmers (e.g., pest control advisor, water management advisor), to avoid driving small farmers out of business.
14. Similarly, to minimize individual farmer costs without sacrificing program effectiveness, the majority of interviewees emphasized that a future Order should provide for self-certification, self-inspection, and self-reporting for farmers, combined with random inspections/audits, for farmers whose operations pose a low risk to water quality (however defined). See also the section 6 above.
15. Similarly, several interviewees commented that a variety of well-designed educational, certification, monitoring, and reporting tools and forms already existed for similar efforts, and could readily be used or adapted for a future Order.

8. Communicating with and Supporting Monitoring Groups

1. Nearly all of the interviewees felt that for an Order to be successful, the Board would have play a strong and visible leadership role, and interact regularly and directly with farmers as well as other major stakeholders.
2. Several interviewees felt that the Board's ability to implement an Order would provide a measure of whether the Board was able to expand its work beyond regulation to collaborative water quality protection.
3. The majority of interviewees felt that the Board had to do a better job of educating farmers about the purpose of discharge requirements and monitoring, the results of these efforts, and the value and benefits derived from these efforts.
4. Similarly, several interviewees felt that Board would have to communicate key messages repeatedly, namely that (1) that the Board recognizes the unique qualities of regional agriculture and its contribution to a healthy economy and food system, (2) the Order is equitable insofar as the Board believes that all landowners in rural areas share responsibility for water quality (rather than farmers being "singled out"), and (3) monitoring requirements are based on actual data.
5. The majority of interviewees felt that to achieve a high level of awareness of the Order among farmers, the Board would have to actively conduct and lead outreach efforts.
    a. They felt that relying on the monitoring groups meant that outreach efforts would only reach constituencies that are already aware of the Order.
    b. While other organizations could advance outreach efforts, they felt that these would not be successful on their own without the Board making its commitment and leadership visible in rural areas.
    c. In the words of one interviewee, the Board had to build a "community of practice" that linked farmers and other rural landowners, public agencies, and non-profit organizations in support of implementing the Order.
6. A majority of interviewees emphasized that the Board, including Board members and staff, had to hold associated meetings in agricultural communities, and come out to meet farmers and farming associations where they work. These meetings would provide opportunities to talk directly, explain the Order, and answer questions in way that was more respectful, personable, and effective than other communications or locations.
    a. Commodity group meetings were also noted as another good venue for outreach and relationship-building.
7. With regard to California Native American Tribes, it was suggested to send information to the chairperson and environmental director of each tribe in the region. Per Assembly Bill 52 of 2014, the Water Boards must, upon request of a tribe, formally consult with them about "tribal cultural resources" during the California Environmental Quality Act (CEQA) review process.

8. Nearly all interviewees felt that for an Order to be successful, the Board would have to partner with the range of established and respected organizations that already work effectively with agricultural communities. Key areas for partnering included education, technical assistance, and training; outreach and enrollment; and inspections and audits.
    a. With regard to education, technical assistance, and training, organizations mentioned included Resource Conservation Districts, the University of California Cooperative Extension including their Farm Advisors, and the USDA Natural Resource Conservation Service.
    b. With regard to outreach and enrollment, organizations mentioned included water districts, commodity and professional associations, as well as the aforementioned educational organizations and the San Diego and Riverside County Farm Bureaus, and California Department of Food and Agriculture.
    c. With regard to inspections and audits, organizations mentioned included San Diego County's Department of Agriculture, Weights, and Measures, and Riverside County's Agricultural Commissioner's Office, as well as other relevant programs within each county (e.g., San Diego's Watershed Protection Program).
    d. A few interviewees suggested that the Board needed to develop and share an implementation strategy that documented key partnerships and roles.
9. Several interviewees suggested that the Board convene some form of an advisory committee to provide feedback on implementation of the Order, as well as to support outreach and education efforts, to help disseminate monitoring findings and analyses, and possibly to advise on technical issues.
10. The majority of interviewees felt that for the Order to succeed, it must provide some incentive for participation, whether simply self-certification and reporting or participation in a monitoring group. This likely would come in the form of technical assistance such as an irrigation evaluation, compliance advising, or support in developing a conservation plan. This would hinge on effective partnering with organizations whose mission included the provision of technical assistance.
    a. A few interviewees felt that the Board should work with other agencies and organizations to streamline inspections/audits and combine these with advising on how to meet discharge requirements. They felt that having one person provide advice and enforcement at the same time would make it highly likely that farmers would implement best management practices and other measures.
11. Several interviewees felt that the Board needed to use the fees collected to clearly support implementation of the Order, including corresponding documentation for accountability purposes.
12. A few interviewees felt that the Board should provide funding to directly support the work of monitoring groups, through monitoring cost-share agreements, federal grants, or other mechanisms.

13. Nearly all interviewees felt that the Board had to make the Order easier to understand, had to significantly improve communication with farmers, and had to facilitate compliance. Suggestions included:
    a. Ensure that materials are easily understood; this particularly includes but is not limited to the implementation timeline and phasing, compliance fees, and penalties for non-compliance. "Know your audience" and keep in mind that large numbers of constituents are not professional or full-time farmers.
    b. Ensure that the Board's point of contact for the Order is well-versed in both the details and rationale of its various components, and in the diversity of agricultural endeavors and practices in San Diego and Riverside Counties.
    c. Ensure that the Board's point of contact for the Order is personable, and responds diligently to telephone calls and email inquiries.
    d. Ensure that the Board's point of contact for the Order has a positive attitude that encourages participation and shared responsibility that includes the Board, and upholds the standards of the program.
    e. Provide tools and materials that are available online and can be submitted electronically, such as electronic self-certification forms and self-reporting checklists.
    f. Provide the ability for farmers to submit anonymous questions and comments online.

9. Recommendations

This final section draws on the findings above and calls out corresponding recommendations that should support the development and implementation of a successful Order.

The Board's Status among Stakeholders

1. Demonstrate executive commitment to the program, including continuity in staffing and funding.
2. Demonstrate the use of monitoring information, including sharing of analyses and interpretations of their significance, establishing corresponding goals and questions for monitoring in specific sub/watersheds, and adjusting monitoring requirements over time.

The Use of Science

3. Establish baseline conditions for each watershed using scientific data, and use these to design monitoring requirements appropriate to the scope or intensity of demonstrated water quality concerns in the various watersheds.
4. Examine and clarify the proportional contribution of all rural landowners – including particularly homeowners, as well as golf courses, tribal lands and Caltrans roadways – to water quality conditions in rural areas.
5. Have the monitoring groups' monitoring plans reviewed by experts, whether internal or contracted, to ensure the results will be scientifically rigorous.

Threshold for Enrollment

6. Provide a clear rationale for whatever criterion or criteria are used to establish a threshold for enrollment.
7. Use a combination of threshold criteria that include consideration of the risk of water quality impacts.
8. Establish tiered requirements for those who are not exempt from the Tentative Order, including self-certification, reporting, and inspection for the lowest tier.

Encouraging Enrollment

9. Provide dedicated resources for both outreach and enforcement, and technical assistance incentives for participation in the program.
10. Provide a viable option for individual enrollment.
11. Allow for self-certification, inspection, and reporting, combined with random audits, for farmers whose operations pose a low risk to water quality (however defined).
12. In the interest of transparency and accountability, clearly explain the justification of fee rates, and provide clear documentation of the use of those fees.

Monitoring and Reporting

13. Revisit the topic of whether requiring whether biological assessment indicators are feasible, and if desired, consider how to provide corresponding technical and/or financial assistance.
14. Develop a database to pilot and demonstrate the utility of integrated watershed monitoring, including necessary data sharing protocols, and municipal storm water monitoring data.
15. Provide feedback on the sufficiency and significance of monitoring plans and results.
16. Within the Board and with each county, integrate permitting, monitoring requirements and reporting, and inspections where possible.
17. Provide reference monitoring costs that are based on standard practices and the rates of well-regarded laboratories.

Communicating with and Supporting Monitoring Groups

18. Commit to playing a strong and visible leadership role, including regular and direct interaction with farmers and agricultural communities, as well as other major stakeholders.
19. Prioritize the education of farmers about the purpose of discharge requirements and monitoring, the results of these efforts, and the value and benefits of these efforts.
20. Develop and deliver key messages around the value of regional agriculture, the fairness of the requirements, and the basis of monitoring requirements in data.
21. Partner with the range of established and respected organizations that already work effectively with agricultural communities, including on education, technical assistance, and training; outreach and enrollment; and inspections and audits.
22. Develop and share a corresponding implementation strategy that documents key partnerships and roles, and a timeline with phased implementation, including periodic review and adjustment of monitoring requirements in each watershed.
23. Communicate early with California Native American Tribes, including the option for formal consultation.
24. Consider forming a representative advisory committee to provide feedback, support outreach and education, share information, and possibly advise on technical issues.
25. Provide some level of support to monitoring groups in identifying potential funding resources, such as State Water Resources Control Board and federal grants and loans.
26. Establish a Board point of contact who has expertise in the Order and agriculture in the region, and is highly responsive to queries and requests for assistance.
27. Through the Board's website, provide easy access to electronic tools and materials that facilitate compliance, and provide for the submission of anonymous questions and comments, including the posting of responses if they are likely to be helpful to broader audiences.