

IRRIGATED LANDS REGULATORY PROGRAM UPDATE

July 2015

This month's ILRP report provides an update on the activities of the North Coast, San Francisco, Central Coast, Los Angeles, Lahontan, Colorado River Basin, Santa Ana, and San Diego Regional Water Quality Control Board ILRPs through July 2015. Future monthly reports will alternately present status of the Central Valley Regional Water Board ILRP one month, and the other Regional Water Board ILRPs the alternate month. Current and past ILRP program monthly reports can be found on the [State Water Board Irrigated Lands Regulatory Program](#) website.

STATE WATER BOARD

On July 1, 2015, Irrigated Lands Regulatory Program (ILRP) staff participated in a meeting with California Bioresources Alliance (CBA) as part of a planning committee to discuss a final agenda for the November 4-5, 2015 CBA Annual Symposium. The agenda includes first day sessions on Food Safety; Setting Standards and Factoring in Precautions regarding "Compost, Co-digestate, and Biochar". The second day will expand discussion on research on digestate and biochar.

On July 6-7, 20-22, and 30-31, 2015, ILRP staff and Division of Information Technology (DIT) staff interviewed ILRP staff in the San Francisco Bay, Los Angeles, Colorado River Basin, and Santa Ana Regional Water Boards for an Information Management Solution Project. ILRP staff in the North Coast and San Diego Regional Water Boards will be interviewed in August 2015.

On July 14, 2015, ILRP staff participated in a San Diego Regional Water Board ILRP stakeholder workshop. The workshop was held at the Oceanside Wastewater Treatment Facility.

On July 17, 2015, ILRP staff met with CalRecycle and Pat McLafferty Principal Hydrosagritech, Inc. to discuss the potential of obtaining a CalRecycle regulatory exclusion for private wastewater treatment works that co-digest anaerobically digestible material (ADM).

On July 17, 2015, ILRP staff attended a California Department of Food and Agriculture (CDFA) Environmental Farming Act Science Advisory Panel meeting jointly hosted by CDFA and CalRecycle. Topics of discussion included the following:

- Healthy Soils Initiative;
- Impact of Soil Organic Matter on Nutrient Conservation and Soil Health;
- Microbial Communities, Compost and Implications for Soil Health;
- CalRecycle and efforts to date on compost; and
- A tool for incentivizing soil health in agriculture.

On July 20, 2015, ILRP staff attended a Nitrogen Management Plan Technical Advisory Work Group Meeting hosted by East San Joaquin Water Quality Coalition to discuss University of California Cooperative Extension perspectives on methodologies for measuring or estimating nitrogen removal.

On July 28, 2015, ILRP staff participated in a meeting with State Water Board and Department of Pesticides (DPR) Multi-Agency Agreement (MAA) coordinators to discuss the potential of conducting a joint agency training session.

NORTH COAST REGION

North Coast Regional Water Quality Control Board (Regional Water Board 1) staff continue to develop the Agricultural Lands Discharge Program, focusing on a series of targeted permits specific to agricultural commodities or geographic areas. An update on several efforts follows.

Agricultural Lands Discharges in the Tule Lake Basin:

Regional Water Board 1 staff continue to write a working draft permit to share with the Advisory Group in October of 2015. Regional Water Board 1 staff will then incorporate input from stakeholders and develop documents to satisfy the California Environmental Quality Act (CEQA). The draft permit and CEQA documentation will be distributed for public review and comment in the spring of 2016. The Regional Water Board hearing to consider adopting the permit is planned for late 2016.

Easter Lily Bulb Cultivation:

Regional Water Board 1 staff are sampling tributaries in the Smith River Plain to screen for the presence of agricultural pollutants and toxicity. Regional Water Board 1 staff completed the final round surface water sampling June 2015. Regional Water Board 1 staff also sampled groundwater in June 2015 at several wells in the Smith River plain. The lab results are not yet available. Regional Water Board 1 staff intend to bring the lily bulb cultivation discharge permit for Board consideration in 2017, after adoption of the Tule Lake agricultural lands discharge permit.

Vineyards & Orchards:

Regional Water Board 1 staff are coordinating with the San Francisco Bay Regional Water Quality Control Board (Regional Water Board 2) on their development of a discharge permit for vineyards in the Sonoma Creek and Napa River watersheds, with the intent of being as consistent as possible between the regions. Regional Water Board 1 staff are also working with third-party certification programs to incorporate water quality requirements that are consistent with likely future permit requirements. Regional Water Board 1 staff will begin drafting a permit for discharges from vineyards and orchards after the adoption of the other two Agricultural Lands Discharge Program permits.

Discharges from Marijuana Cultivation:

Regional Water Board 1 staff released the public review draft of the Waiver of Waste Discharge Requirements and General Water Quality Certification for Discharges of Waste Resulting from Marijuana Cultivation and Associated Activities or Operations with Similar Environmental Effects in the North Coast Region. The Regional Water Board hearing scheduled for August 2015.

SAN FRANCISCO BAY REGION**Tentative Waiver of Waste Discharge Requirements for Existing Dairies:**

The San Francisco Regional Water Quality Control Board (Regional Water Board 2) renewed a conditional waiver of Waste Discharge Requirements (Waiver) for existing dairies at their June 10, 2015 hearing. The Waiver includes requirements for a) management of grazing lands to protect water quality for dairies that maintain pasture-based grazing; b) management of manure and liquid waste applications to land through the preparation and implementation of site-specific nutrient management plans; c) sampling and analysis of groundwater wells and near-facility surface waters, and d) management of waste water generated from on-site food processing (such as cheese). The Waiver requires enrollment through a completion of a Notice of Intent due in September 2015. Regional Water Board Staff efforts since June 10, 2015 have focused on outreach to facilitate the program enrollment and compliance.

Vineyard WDRs Program Development:

Regional Water Board 2 staff continue to prepare an environmental impact report that evaluates potential environmental impacts from implementing the Vineyard WDRs and continue to work on the draft general WDRs. As part of this effort, Regional Water Board 2 staff have remained engaged with parties that have expressed an interest in serving as third-party technical assistance groups to assist farmers to comply the anticipated requirements of the WDRs. At a minimum, third parties will assist producers in preparing farm plans that identify, plan, and schedule the implementation of effective management practices to achieve the performance standards identified in the WDRs.

Regional Board 2 staff also participated in the early phases of the Irrigated Lands Regulatory Program Information Management System (IMS) project. On July 9, 2015, Regional Water Board 2 staff participated in a day-long series of interviews conducted by State Water Board staff and their consultant, to answer questions regarding our current data tracking system and to provide input on our needs for data management and reporting.

Grazing Waiver Program:

Regional Water Board 2 staff completed twelve grazing lands site inspections for the 2014-2015 field season to assess enrollee compliance with conditional waivers of WDRs for rangeland grazing operations. Regional Water Board 2 staff inspected ranches in the Tomales Bay watershed, as well as additional ranches in the Napa River and Sonoma Creek watersheds. Fortunately, grazing practices observed during

this inspection season were consistent. The prolonged drought has had an impact on rangelands resulting in less available forage and residual dry matter. Ranchers have generally responded by reducing herds and modifying grazing rotations.

Looking forward, the Regional Water Board 2 intends to continue to conduct inspections and program outreach to increase levels of participation and annual reporting and pursue progressive enforcement as appropriate. In addition, Regional Water Board 2 staff worked closely with the Tomales Bay Advisory Committee and stakeholders to develop a coordinated monitoring program, which was implemented this past wet season. Regional Water Board 2 staff plan to evaluate the results this summer and meet with our monitoring partners and stakeholders to finalize the monitoring program for the next wet season.

CENTRAL COAST REGION

ILRP Surface Water Activities at a Glance:

The Central Coast Water Quality Control Board Irrigated Lands Regulatory Program ILRP (Regional Water Board 3) staff is in the planning stages of outreach efforts to help growers and their consultants understand Agricultural Order requirements. Regional Water Board 3 staff have received requests from two entities to provide a general overview of requirements. In addition, Regional Water Board 3 staff will update growers and consultants regarding the total-nitrogen-applied report that is required of high-risk Tier 2 and Tier 3 growers and due in October 2015. Regional Water Board 3 staff will also use these outreach opportunities to discuss findings presented to the Regional Water Board at the May 2015 meeting regarding management practice implementation, as reported on the Annual Compliance Form.

Regional Water Board 3 staff is developing an implementation strategy to actively identify growers who have failed to enroll in the Agricultural Order. A gross assessment indicates that non-enrollment may be prevalent, particularly in a few specific areas. Growers, consultants, and agency groups have voiced their concerns about creating a level playing field in the light of the many growers who make considerable effort to comply with regulatory requirements while others are able to avoid them simply by not enrolling in the Order.

In March 2015 Regional Water Board 3 staff sent 169 notices of violation (NOVs) to growers and landowners who failed to complete the Nitrate Loading Risk to Groundwater Determination (Section C of the Annual Compliance Form) or failed to submit the entire Annual Compliance Form. The Nitrate Loading Risk to Groundwater Determination is used to determine whether a grower is required to submit total-nitrogen-applied information and irrigation/nutrient management plan implementation information. In June 2015, Regional Water Board staff followed up with growers who did not respond to the March 2015 NOVs by sending 62 emails and 10 letters reminding growers of the requirement. Regional Water Board 3 staff is currently assessing the nitrate-loading risk to groundwater for the ranches that have not submitted the required

information. If the risk is high staff will follow up by requiring the total-nitrogen-applied form by October 1, 2015.

Over the past several months Regional Water Board 3 staff has assessed reports received from Tier 3 growers who are required to monitor their individual discharges. Fourteen ranches are currently monitoring and submitting reports. Of these, several ranches submit the required report but report zero discharge and therefore have not collected samples. Two ranches that had discharges have reported nitrate concentrations exceeding water quality standards or toxicity to indicator organisms. In these situations, staff has required follow-up action planning and reporting, as part of the iterative approach, by the ranch operator to address the water quality problems; the follow-up plans are due on the October 1, 2015 reporting date.

Regional Water Board 3 staff received the 2014 draft report of surface water monitoring efforts from Central Coast Water Quality Preservation, Inc. Regional Water Board 3 staff is currently reviewing the report and will coordinate with Preservation Inc. to finalize the report. The Executive Director of Preservation Inc., Kirk Schmidt, is provided a summary of the data as part of item 15 of the July 31, 2015 Central Coast Water Board agenda.

ILRP Groundwater Activities at a Glance:

As of July 1, 2015, Regional Water Board 3 staff has issued notices of violation to approximately 553 farms and ranches enrolled in the Agricultural Order that failed to comply with individual groundwater monitoring and reporting requirements. Regional Water Board 3 staff is working with individual growers and laboratories to assist them with compliance.

Central Coast Groundwater Coalition (CCGC) - Cooperative Groundwater Monitoring and Reporting Compliance Status

Regional Water Board 3 staff is working closely with CCGC to confirm that CCGC has completed or is on track to complete all tasks and deliverables identified in the CCGC workplan, as required.

After evaluating CCGC's well sampling, Regional Water Board 3 staff determined that CCGC likely did not sample all domestic drinking water wells for CCGC member properties as required by the Agricultural Order. On June 25, 2015, the Executive Officer issued a letter to CCGC requiring CCGC to evaluate and confirm that all domestic drinking water wells on all CCGC member property enrolled in the Agricultural Order have been sampled and results reported to the Central Coast Water Board per the approved CCGC workplan.

On June 1, 2015, CCGC submitted "Final Report, Northern Counties Groundwater Characterization: Salinas Valley, Pajaro Valley, and Gilroy-Hollister Valley." On June 25, 2015, the Executive Officer issued a letter to CCGC accepting the final report with a conditional approval dependent on the results of CCGC's domestic well sampling evaluation described above. If additional domestic well sampling is

required and the results of that sampling result in a different interpretation than that described in the final report, the Executive Officer may require CCGC to revise the relevant submittals.

CCGC submitted the draft groundwater characterization reports for the southern counties on July 15, 2015, and the final reports will be submitted on July 31, 2015.

LOS ANGELES REGION

Background on the Conditional Waiver:

The Conditional Waiver of Waste Discharge Requirements for Dischargers from Irrigated Lands adopted by Order No. R4-2010-0186 (Conditional Waiver) requires agricultural operators (dischargers) to enroll irrigated agriculture property under the waiver in order to continue discharging waste to waters of the state. Agricultural operators may enroll as an individual discharger or as a member of a discharger group. The Nursery Growers Association Los Angeles County Irrigated Lands Group (NGA-ILG) and the Ventura County Agriculture Irrigated Lands Group (VCAILG) are the two discharger groups in the Los Angeles Region that have formed to assist enrolled growers to comply with the Conditional Waiver.

Enrollment and Outreach:

On June 1, 2015 Los Angeles Regional Water Quality Control Board (Regional Water Board 4) staff sent Notice of Violation letters to growers for failure to enroll in the Conditional Waiver. Regional Water Board 4 staff are currently in a process of updating the statuses of the violations. Regional Water Board 4 staff approved one workshop in July 2015 provided by UCCE Ventura County.

Interagency Coordination:

Regional Water Board 4 staff continue working with the Los Angeles Department of Water and Power (LADWP). In May 2015, LADWP sent letters to their tenants to enroll in the Conditional Waiver. On July 15, 2015 Regional Water Board 4 staff met with representatives from NGA-ILG and environmental consultants to discuss potential changes to the Conditional Waiver, which will be proposed for renewal later this year. On July 6 and 7, 2015 Regional Water Board 4 staff participated in a meeting with representatives from state Water Resources Control Board and Highlands Consulting Group. Regional Water Board 4 staff presented the current database and management system. Regional Water Board 4 staff were interviewed by Highlands Consulting representatives to obtain the necessary information for business process analysis.

Water Quality Management Plan (WQMP):

Regional Water Board 4 staff reviewed and approved the 2014 WQMP prepared for Ventura County Agricultural Irrigated Lands Group.

Annual Monitoring Reports:

Regional Water Board 4 staff completed reviewing and analyzing the water quality monitoring data submitted as part of the 2013-2014 Annual Monitoring Reports by VCAILG and NGA-ILG. The Regional Water Board 4 staff also compiled all annual monitoring report data over the past seven years to assess trends in water quality as part of the Conditional Waiver renewal process.

Conditional Waiver Renewal:

Regional Water Board 4 staff are working on a report for a review of the Conditional Waiver Order No. R4-2010-0186 and recommendations for waiver renewal.

Irrigated Lands Program Region 4 GIS Database:

Regional Water Board 4 staff added the water quality data submitted by VCAILG and NGA-ILG to the R4 GIS geodatabase. Regional Water Board 4 staff analyzed a variety of data such as water quality, field measurements and implemented BMPs using GIS. Regional Water Board 4 staff continue to update the Irrigated Lands Program geodatabase including enrollment and enforcement for both Ventura and Los Angeles Counties.

Grant Management:

Regional Water Board 4 staff continue to manage a Clean Water Act section 319(h) grant which was executed for the purpose of identifying the contribution of and reducing metal loadings from nurseries and other irrigated agricultural lands in the San Gabriel River Watershed (Grant Agreement No. 11-098-554).

LAHONTAN REGION

The Lahontan Regional Water Quality Control Board (Regional Water Board 6) staff allocated efforts during the June/July reporting period on administrative tasks supporting the Irrigated Lands Regulatory Program.

Regional Water Board 6 staff prepared and submitted to State Water Board staff a Budget Change Proposal concept paper for FY 2016/2017.

Regional Water Board 6 staff provided additional information to support Division Management Committee budget discussions.

Regional Water Board 6 staff also spent significant time working on contaminated groundwater issues associated with irrigated agricultural areas and irrigated land areas associated with dairies.

Regional Water Board 6 staff completed and spent time finalizing the technical memorandum describing the Hinkley residential well sampling results. Regional Water Board 6 staff also attended the Citizen's Advisory Committee meeting to discuss the results and provide handouts.

Regional Water Board 6 staff met in late June 2015 with City of Bishop and the Eastern Sierra Community Services District regarding wastewater treatment plant upgrades to address groundwater pollution impacts. One component of the project will be considering improvement in recycled water disposal to lands that are currently flood irrigated.

Regional Water Board 6 staff met with the Helendale Community Services District regarding improvements needed to the wastewater treatment plant that will address groundwater degradation issues associated with effluent disposal to irrigated land.

COLORADO RIVER BASIN REGION

Colorado River Basin Water Board (Regional Water Board 7) staff continues to implement four Conditional Waivers of Waste Discharge Requirements for agricultural discharges. Most agricultural areas (99.7%) in the region are regulated by Conditional Waivers.

In July 2015 Regional Water Board 7 staff created an Irrigated Lands Regulatory Program [web page](#) on the Regional Board website. The website contains information about the four Conditional Waivers, as well as helpful links for the Public to learn more about the Program.

On July 21 and 22, 2015 Regional Water Board 7 staff participated in the Irrigated Lands Regulatory Program IMS Project Interviews held at the Regional Water Board office.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural wastewater discharges within the Palo Verde Valley in Riverside and Imperial Counties (Board Order R7-2012-0047) on September 20, 2012. This Conditional Waiver affects over 130,000 acres in eastern Riverside County and northeastern Imperial County. The responsible parties include individual farmers, and the Palo Verde Irrigation District (PVID). Implementation has begun with PVID forming the Palo Verde Outfall Coalition (PVOC), a group that represents landowners and farmers regulated by the Conditional Waiver. According to the PVOC group, membership is at over 99%. The PVOC group's water quality monitoring program began in November 2013.

The PVOC submitted their second Annual Monitoring Report in March 2015 to the Regional Water Board. It was approved by our Executive Officer on June 5, 2015. Based on Regional Water Board 7 staff review of the monitoring results, Colorado River Basin Water Board Executive Officer recommended that PVOC's Monitoring and Reporting Program be revised.

The PVOC group will continue with the Group Compliance Program, and to submit

reports of water quality sample results.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural wastewater discharges originating within the Bard Unit of Reservation Division (Board Order R7- 2013-0002) on January 17, 2013. This Conditional Waiver affects approximately 6,688 acres of farmland along the Colorado River near Yuma, Arizona. The responsible parties include individual farmers, and the Bard Water District (BWD). Implementation has begun with BWD forming the Bard Unit Coalition Group (BUCG), a nonprofit organization that represents landowners and farmers regulated by the Conditional Waiver. According to the BUCG group, membership is at over 99%. The next step will be for the BUCG to submit their coalition member information. The BUCG water quality monitoring program began in June 2015.

On June 27, 2015 a revised Monitoring and Reporting Program Plan (MRP) was submitted by BUCG to Regional Water Board staff. Regional Water Board 7 staff are reviewing the revised MRP.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural dischargers in the Coachella Valley (Order No. R7-2014-0046) on June 26, 2014. A Monitoring and Reporting Program Plan was adopted with the Conditional Waiver. This Conditional Waiver affects about 60,000 acres of farmland in central Riverside County. The responsible parties include individual farmers, the Coachella Valley Water District (CVWD) and the Coachella Valley Irrigated Lands Coalition (CVILC). Implementation has begun. The CVILC, a nonprofit organization, has partnered with CVWD to represent landowners and farmers regulated by the Conditional Waiver. The CVILC began implementing their Compliance Program in April 2015. They are currently accepting membership. The next step will be for the CVILC to submit their coalition member information.

On April 30, 2015 the CVILC submitted a draft Quality Assurance Project Plan. Regional Water Board staff have reviewed the draft QAPP and sent review recommendations to CVILC. Regional Water Board staff and CVILC continue to discuss revisions to the QAPP. Once the QAPP is approved by our Executive Officer, the next step will be for the CVILC to begin monitoring.

The Colorado River Basin Water Board adopted a Conditional Waiver of WDRs for agricultural dischargers in the Imperial Valley (Order No. R7-2015-0008) on January 15, 2015. This Conditional Waiver affects over 450,000 acres of irrigated lands in the Imperial Valley near the International Boundary with Mexico. The interested parties include individual farmers, the Imperial Irrigation District (IID) and Imperial County Farm Bureau (ICFB). The ICFB currently manages a Voluntary TMDL Compliance Program and plan to transition this into a Coalition Group Compliance Program. The IID and ICFB have agreed to work together to form a joint Coalition Group Compliance Program.

On June 10, 2015, the ICFB held a make-up TMDL drain-shed meetings. Regional

Water Board 7 staff participated in the meetings and discussed elements of the Conditional Waiver.

On June 24, 2015, the ICFB submitted a Request for Deadline Extensions for the Conditional Waiver. Regional Water Board 7 staff are reviewing the Request.

On July 15, 2015 the ICFB submitted a draft Compliance Program Plan (CPP). Regional Water Board 7 staff are reviewing the draft CPP.

SANTA ANA REGION

Conditional Waiver of Waste Discharge Requirements for Agricultural Discharges (CWAD) Update: The draft California Environmental Quality Act (CEQA) Initial Study/ Mitigated Negative Declaration for the CWAD was completed and mailed to the State Clearinghouse for distribution on May 12, 2015. State agencies were provided 30 days for review and comment, pursuant to the CEQA's State Clearinghouse review requirements for draft environmental documents. The review period closed June 12, 2015. No comments were received from the State agencies.

On June 19 2015, the Santa Ana Regional Water Quality Control Board (Regional Water Board) held a public workshop during a regular Santa Ana Regional Board meeting, where the Conditional Waiver was presented to the Board members and attended by members of the public and the Regional Board (CWAD) Advisory Group. A follow-up Advisory Group meeting was held on July 22, 2015 to discuss and respond to possible areas of concern with the current draft version of the CWAD, and to provide clarification on requirements stated within the waiver. Stakeholders, including the Advisory Group, are in the process of reviewing the most recent version of the CWAD. Regional Water Board 8 staff anticipates receiving comments from the Advisory Group before the next Advisory Group meeting tentatively scheduled for August 20, 2015.

The [CWAD Initial Study, proposed Mitigated Negative Declaration, Draft Order, and Regional Water Board 8 Staff Report](#), have been posted on the Regional Board's website and are available for public review.

Regional Water Board staff expect that initial implementation of the CWAD would be characterized by the enrollment of at least 50 percent (40-50 operations) of the agricultural operations known to meet the CWAD enrollment criteria. The objective for FY 2015-2016 is to have the Regional Board consider adoption of the CWAD, and then begin implementation by focusing on agricultural operations in the Upper San Jacinto River watershed.

The desired outcome of the conditional waiver is to measurably reduce NPS pollution, principally Nitrogen and TDS loadings, to both surface and ground waters from agricultural operations in the San Jacinto River Watershed. Based on an estimate of 137 potentially eligible enrollees, the CWAD program will seek to attain at least 20

percent enrollment by the end of December 2015, if the CWAD is adopted without need for further major revision.

Other Activities: In connection with the State Water Board ILRP development of an “Information Management Solution” or IMS, Regional Water Board 8 staff is participating in several coordination meetings to provide input on the process. Regional Water Board 8 staff met with consultants from the Highlands Consulting Group as well as Johnny Gonzales and Charlow Arzadon from the State Water Board to discuss our Regional Water Board specific database needs for the agricultural waiver. Short-term next steps include additional meetings and discussion to more fully flesh out the process and/or database system issues that the Regional Water Board will want or need to be addressed overall, including the information needs to adequately manage CWAD monitoring and reporting requirements.

SAN DIEGO REGION

The Regional Water Quality Control Board, San Diego Region (Regional Water Board 9) is developing Tentative General Waste Discharge Requirements for Discharges from Commercial Agricultural and Nursery Operations within the San Diego Region (Tentative Order) and associated draft California Environmental Quality Act (CEQA) documentation. It is anticipated that the Tentative Order and draft CEQA documentations will be considered for adoption by the San Diego Water Board in late 2015.

Status of Development of the Agricultural Order:

An Administrative Draft of the Tentative Order was released on July 3, 2015. The comment period for the Administrative Draft of the Tentative Order ends on July 31, 2015. Comments received by that date will be considered prior to releasing the Draft Tentative Order for formal public comment later this year.

Stakeholder/Public Outreach:

Public workshops were held on July 14 and 15, 2015 to provide the public an opportunity to discuss and to comment on the Administrative Draft of the Tentative Order. Approximately 60 individuals attended, including growers, California Native American Tribes, irrigated lands groups, water districts, local municipalities, the County of San Diego, the National Resource Conservation Survey, and the University of California Cooperative Extension.

The Public workshops were facilitated by Dr. Dorian Fougères of the California State University Sacramento’s Center for Collaborative Policy. Invited speakers included David Gibson, Executive Officer of the San Diego Water Board; Johnny Gonzales, Program Coordinator for the State Water Board’s Irrigated Lands Regulatory Program; and Dr. Raphael Mazor of the Southern California Coastal Water Research Project and Coordinator for the Southern California Monitoring Coalition.

The following action items for the San Diego Water Board were identified during the workshops:

- Expand the public outreach to try to improve participation by growers;
- Conduct additional public workshops in the evening and at locations that will be more favorable for growers; and
- Convene a meeting with stakeholders and Ms. Chiara Clemente, Senior Environmental Scientist of the Compliance Assurance Unit, to discuss the enforcement approach that may be used to address future violations of the Order, once adopted.