

**STATE WATER RESOURCES CONTROL BOARD
EX PARTE COMMUNICATIONS REGARDING PENDING GENERAL ORDERS
DISCLOSURE FORM**

Note: This form is intended to assist the public in providing the disclosure required by law. It is designed to document meetings and phone calls. Written communications may be disclosed by providing a complete copy of the written document, with attachments. Unless the board member(s) provided you with a different contact person, please send your materials to: commentletters@waterboards.ca.gov. Use of this form is not mandatory.

1. Pending General Order that the communication concerned:

ILRP 4.0

2. Name, title and contact information of person completing this form:

Note: Contact information is not mandatory, but will allow the Water Board to assist you if additional information is required. If your contact information includes your personal residence address, personal telephone number or personal email address, please use a separate sheet of paper if you do not want that information posted on our website. However, this information may be provided to members of the public under the Public Records Act.

Abby Taylor-Silva, Vice President, Grower-Shipper Association of Central California, 831-422-8844

3. Date of meeting, phone call or other communication: 10/19/20

Time: 11:00 a.m.

Location: ZOOM

4. Type of communication (written, oral or both): Oral

5. Names of all participants in the communication, including all board members who participated:

Jean-Pierre Wolff, Tess Dunham, Abby Taylor-Silva

6. Name of person(s) who initiated the communication:

Abby Taylor-Silva, Grower-Shipper Association of Central California

7. Describe the communication and the content of the communication. Include a brief list or summary of topics discussed at the meeting, any legal or policy positions advocated at the meeting, any factual matters discussed, and any other disclosure you believe relevant. The Office of Chief Counsel recommends that any persons requesting an ex parte meeting prepare an agenda to make it easier to document the discussion properly. Attach additional pages, if necessary.

Discussion of ex parte documents shared on 10/15. Separate Ex Parte form filed for those. Discussion centered around PPT previously shared (and included again in this ex parte filing).

8. Attach a copy of handouts, PowerPoint presentations and other materials any person used or distributed at the meeting. If you have electronic copies, please email them to facilitate web posting.



Alternative Compliance For
Irrigation and Nutrient
Management Through
Cooperative Trend
Monitoring and Enhanced
Groundwater Follow Up
Program

Big Picture



New additional section to Draft Ag order



Third-party alternative to complying with staff's proposed requirements



Intensive education and outreach

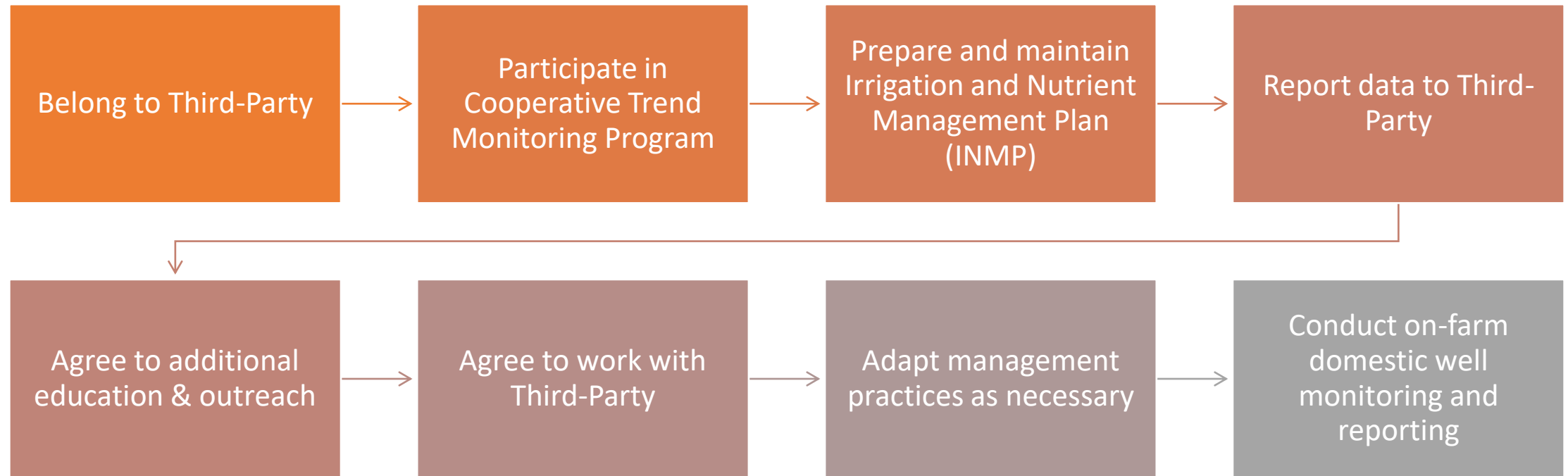


Replaces limits with targets



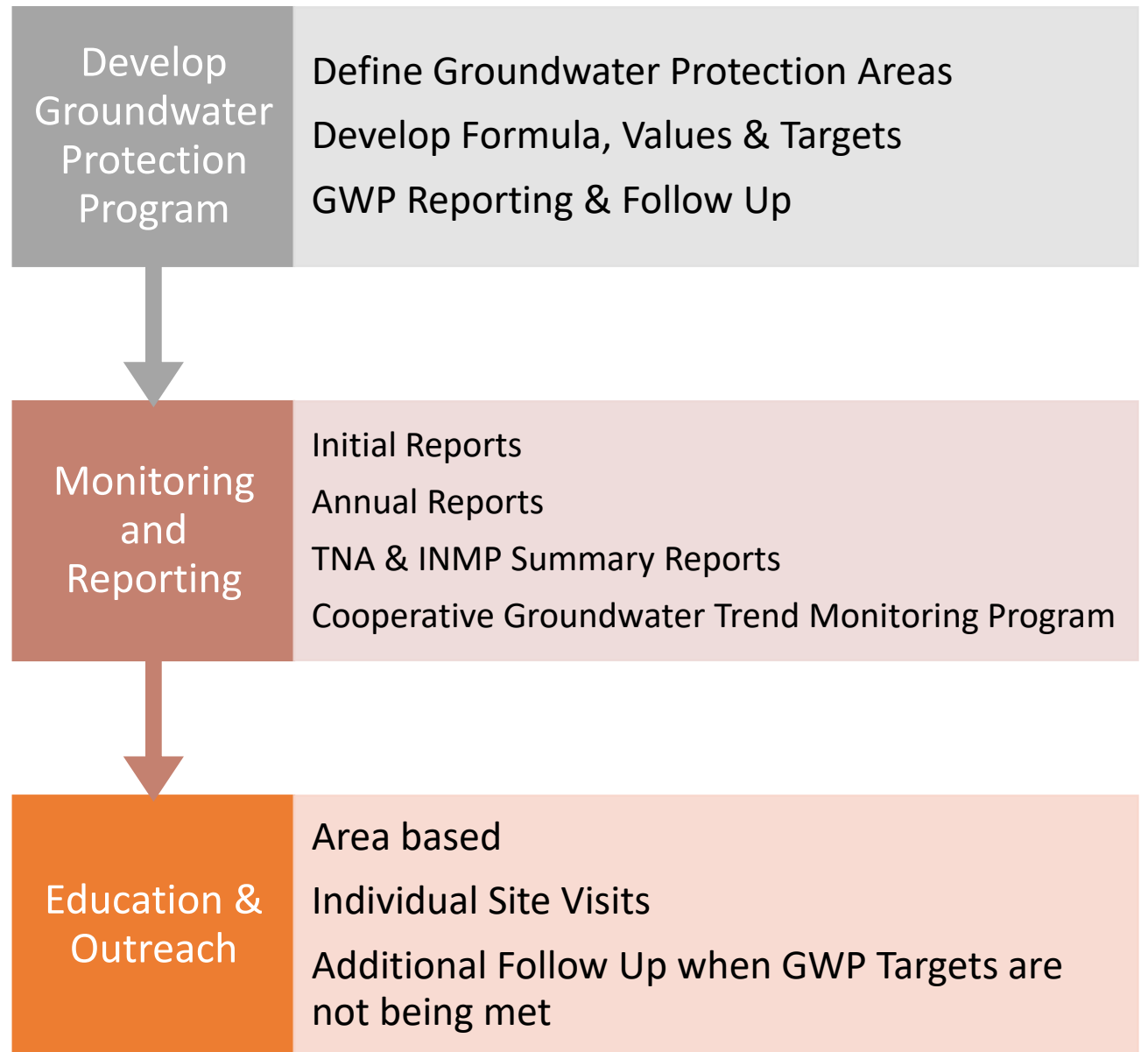
Phased approach

Grower Obligations





Third-Party's Role



Checks & Balances on Growers

Targets

- Short-Term Nitrogen Discharge Targets
- Long-Term Groundwater Protection Targets

Education & Outreach

- Area based outreach
- Individual Site Visits (if exceeding short-term)
- INMP Certification
- Additional follow up based on GWP Target compliance

Monitoring & Reporting

- TNA & INMP Summary Reports
- Annual Compliance Form
- On-farm Domestic Well Monitoring

Failure to Comply with Alternative Program

- Immediately Subject to Terms for Individual Compliance



Short-Term Targets

Nitrogen Discharge Targets

$$\text{AFER} + (\text{C} \times \text{ACOMP}) + \text{AIRR} - \text{R} =$$

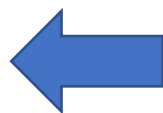
500 lbs By December 31, 2023

400 lbs By December 31, 2026

Per Ranch, Per Year, Per Acre

Triggers Individual Site Visits From Third Party

	crop 1	crop 2	
	romaine lettuce	broccoli	Seasonal Total
Applied N ($A_{fert} + A_{irr}$)			
Applied N (lbs N/acre)	150	200	350
water applied (inches)	15	20	
nitrate concentration (ppm)	45	45	
Applied N in water (lbs N/acre)	155	207	362
Total Applied N (lbs N/acre)	305	407	712
Removed N			
Yield (lbs/acre)	30,000	16,000	
N coefficient	0.00198	0.0046	
Total N removed (lbs N/acre)	59	74	133
A-R (lbs N/acre)			579



No Adjustment Made for ET, Represents Total nitrate-N in Irrigation Water throughout crop life cycle

Short-Term Targets

Nitrogen Discharge Targets

$$AFER + (C \times ACOMP) + AIRR - R =$$

Romaine & Broccoli Rotation Example with total nitrate-N in irrigation water and as ET.

Courtesy Michael Cahn, Ph.D., UCCE

Adjustment Made for ET, showing Total nitrate-N applied in the irrigation water required for crop evapotranspiration (ET)



	crop 1	crop 2	
	romaine lettuce	broccoli	Seasonal Total
Applied N ($A_{fert} + A_{irr}$)			
Applied N (lbs N/acre)	150	200	350
water applied (inches)	7	10	
nitrate concentration (ppm)	45	45	
Applied N in water (lbs N/acre)	72.45	103.5	175.95
Total Applied N (lbs N/acre)	222.45	303.5	525.95
Removed N			
Yield (lbs/acre)	30,000	16,000	
N coefficient	0.00198	0.0046	
Total N removed (lbs N/acre)	59	74	133
A-R (lbs N/acre)			392.95



Long-Term Groundwater Protection Program

Identify Groundwater Protection Areas

Develop Groundwater Protection Formula

Compute Groundwater Protection Values for Groundwater Protection Areas

Identify Groundwater Protection Targets for Groundwater Protection Areas

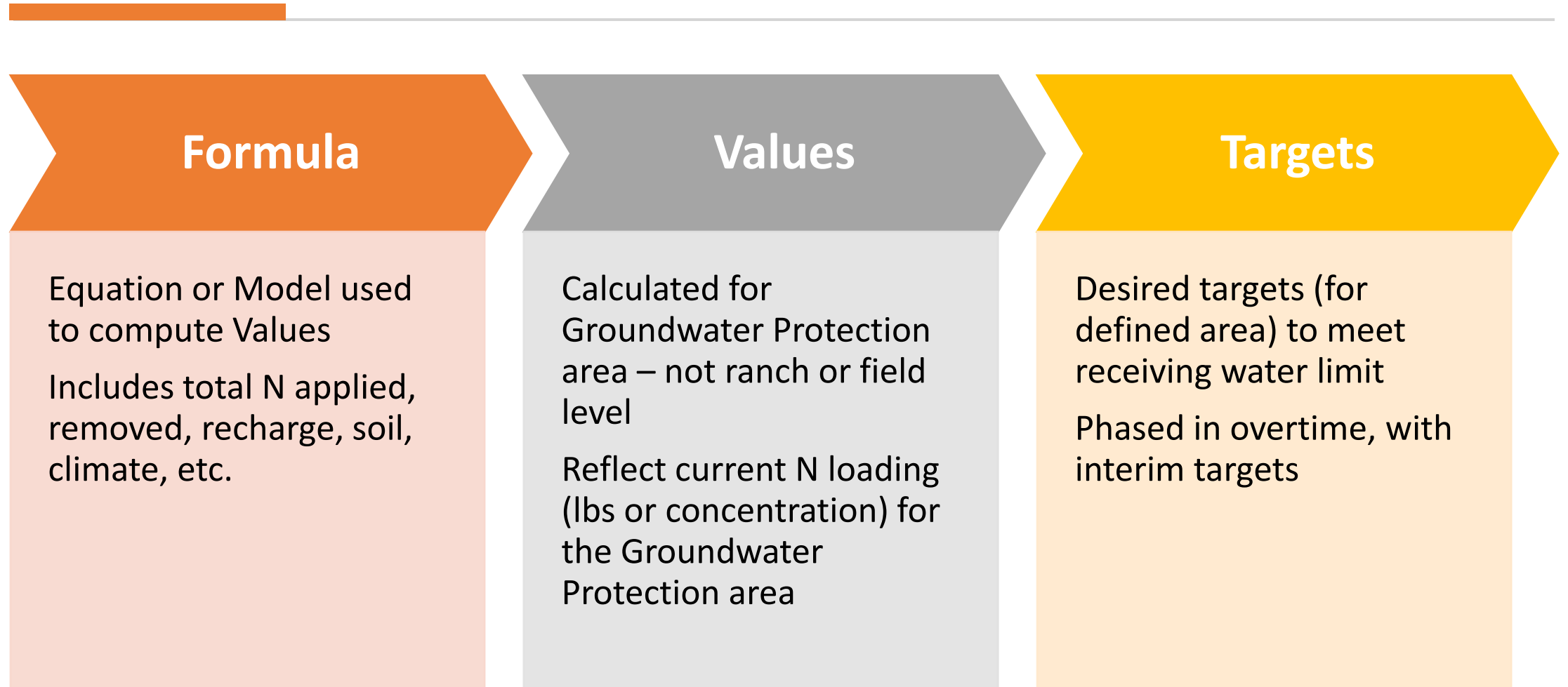
Interim Targets (phased in over time)

Final Targets (meet receiving water limits by 2050)

Groundwater Protection Reports

- Starting in 2030
- Every 5 years
- Evaluate Compliance with Interim and Final Targets
- Identify Additional Follow Up Actions

GWP Formulas, Values & Targets



Timeline for GWP Formulas, Values & Targets

Map of Areas	GWP Formula	GWP Values	GWP Targets
<p>Sept. 1, 2022</p> <p>Submit Map to Water Board of Groundwater Protection Areas and Priority Ranking for Areas</p>	<p>Sept. 1, 2023</p> <p>Submit Groundwater Protection Formula to Water Board</p>	<p>(Est. May 2024) Priority Rank 1 Values 6 mos. from Formula Approval</p>	<p>(Est. May 2025) Priority Rank 1 1 year from Values approval</p>
		<p>(Est. Nov 2024) Priority Rank 2 Values 6 mos. after Priority 1 Values Approval</p>	<p>(Est. Nov. 2025) Priority Rank 2 1 year from Values approval</p>
		<p>(Est. May 2025) Priority Rank 3 Values 6 mos. Priority 2 Values Approval</p>	<p>(Est. May 2026) Priority Rank 3 1 year from Values approval</p>

Ongoing Third-Party Functions

Collects TNA &
INMP Data

Conducts Trend
Monitoring

Prepares Initial
Assessments of
GWP Areas

Prepares Annual
Reports of GWP
Areas

Conducts GWP
Area Outreach &
Individual Visits

Identifies
Additional Follow
Up for GWP Areas



Advantages to Third-Party Alternative Program



Individual outreach & education by Third-Party



Ongoing groundwater
assessment

Trend Program
Groundwater Protection
Program



Ongoing assessment for
meeting targets

Short-term
Long-term



Centralized Data Management & Reporting



Designed to change
behavior

More than a paper exercise

Complies with NPS Policy & ESJ Order

Program Element	Compliance with NPS Policy	Compliance with ESJ Order
Third Party Program	Encouraged by NPS	Encouraged by ESJ Order
Targets (Short Term & Long Term)	Short-term discharge targets Long-term GWP targets Targets are milestones Targets are phased in Receiving water limits by 2050 ✓	Targets are precedential – Limits are not ✓
INMPs & INMP Summary Reports	✓	✓
On Farm Domestic Well Monitoring	N/A	✓
Education & Outreach	Encouraged but not required	✓
Monitoring & Reporting	✓	✓