

AGENDA ITEM: 14

SUBJECT:

Exploring Alternative Irrigated Lands Regulatory Frameworks for Low-threat Commodity Types, with an Initial Focus on Upper-Watershed Irrigated Pasture

BOARD ACTION:

Information Item

BACKGROUND:

Concerns have been raised about the appropriateness of including irrigated pasture in the Irrigated Lands Regulatory Program (Program) for some time. These concerns have grown since the Program evolved to address groundwater impacts and added significant requirements to address nitrate in groundwater. In response to these concerns, staff is evaluating upper-watershed irrigated pasture as a first step in assessing possible alternative regulatory frameworks for the Program.

Irrigated pastures and meadows in the Central Valley provide critical forage for livestock, particularly during the summer dry season. These systems are broadly comprised of native and improved perennial forage grass species, perennial clovers, and other forage legumes.

Research conducted by the University of California (UC), Davis and monitoring data collected as required by the Program collectively indicate that well-managed irrigated pastures and meadows are of low risk to water quality. These findings are driven by the permanent vegetative soil cover and low agronomic inputs common on these systems. However, runoff from irrigated pasture can impact surface water and groundwater quality, due to pesticide use, nitrogen and fertilizer use, sediment, riparian area management, and *E. coli*.

ILRP Staff are currently working with UC Rangelands researchers and agricultural coalitions (with a focus on the Sacramento Valley Water Quality Coalition) to gather information, perform stakeholder outreach, develop commodity specific reporting forms, and perform an economic analysis for irrigated pasture. This information item will provide the status of staff activities and opportunity to hear from the affected agricultural community and UC researchers.

ISSUES:

In order to move forward, we need to determine 1) what aspects of upper-watershed irrigated pasture need to be regulated, and 2) what is the best alternative to implement these regulations.

Possible regulatory alternatives include the following:

1. No change- There are several options available in the current Sacramento River Watershed General Order that can provide some regulatory relief for certain low-threat situations including irrigated pasture. These options can be included in other Program General Orders as appropriate.
2. Change(s) to current Program General Orders- The Program General Orders could be modified to better accommodate irrigated pasture.
 - a. Required reporting could be tailored for irrigated pasture.
 - b. The Third-Party could develop a commodity-based sub-coalition. This might be difficult to implement for growers who rotate crops or have multiple crops.
3. Issue a new Commodity Specific General Order- A new general order could be developed specifically for irrigated pasture. This has been done for the Rice Commission. Again, this might be difficult for growers who rotate crops or have multiple crops.
4. Irrigated Pasture Exemption/ De Minimis Waiver- If it is determined that irrigated pasture does not have the potential to impact water quality, an irrigated pasture exemption or waiver may be issued.

In addition to water quality data, we need to compile additional information to determine what should be regulated and how best to implement the regulations, including the following data:

- Pesticide use data
- Nitrogen/Fertilizer use data
- Management practice data
- Geographic data
- Economic analysis results

RECOMMENDATION:

Not Applicable

REVIEWS:

Management Review:	Sue McConnell
Legal Review:	Jessica Jahr
Date:	12 September 2019
Board Meeting Street Address:	777 Cypress Avenue
Board Meeting City, State, Zip:	Redding, CA 96001