

**Regional Water Quality Control Board  
North Coast Region  
Executive Officer's Summary Report  
December 19, 2019  
Regional Water Board Office  
Santa Rosa, California**

**ITEM:** 7

**SUBJECT:** Update on development of the Smith River Plain Water Quality Management Plan (Ben Zabinsky and Clayton Creager)

**BOARD ACTION:** This is an information item only; no action will be taken by the Board.

**BACKGROUND:** This item will provide an update on the status of efforts by Regional Water Board staff and their partners to address discharges of waste associated with lily bulb operations in the Smith River Plain. Regional Water Board staff last presented to the Board on this topic in February 2019, with a focus on progress to develop the Smith River Plain Water Quality Management Plan (SRPWQMP or Plan) and the ongoing implementation of management practices by the lily bulb growers. This presentation will also focus on the development of the SRPWQMP. Regional Water Board staff and their partners have made considerable progress since the February 2019 meeting. The Plan is being developed to address the water quality impacts of lily bulb operations in the Smith River Plain and the results of surface water sampling done by the Regional Water Board from 2013 – 2017. The sampling screened the coastal tributaries of the Smith River Plain for the presence of agricultural chemicals to determine if operations there were having an impact on water quality. The report documented 17 pesticide detections with five pesticide concentrations above the US Environmental Protection Agency 2017 Aquatic Life Benchmarks. It also documents several instances of aquatic toxicity and concentrations of dissolved copper that exceeded thresholds in some locations. The results of the monitoring are available in the January 2018 *Smith River Plain Surface Water and Sediment Monitoring Report*.<sup>1</sup>

Staff presented the report findings to the Regional Water Board at the April 2018 meeting in Weed. At the meeting the Board directed staff to work together with their partners to develop a water quality management plan to address those findings. The partners working with Regional Water Board staff include the lily bulb growers, the National Marine Fisheries Service (NMFS), the California Department of Fish and Wildlife (CDFW), the Tolowa Dee-ni' Nation, and the Smith River Alliance (a local non-profit involved in fisheries restoration projects and planning). All partners have made important contributions to the draft document.

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<sup>1</sup>[https://www.waterboards.ca.gov/northcoast/water\\_issues/programs/agricultural\\_lands/pdf/180116/180101-FINAL%20SWAMP%20REPORT\\_Smith%20River.pdf](https://www.waterboards.ca.gov/northcoast/water_issues/programs/agricultural_lands/pdf/180116/180101-FINAL%20SWAMP%20REPORT_Smith%20River.pdf)

As part of the development of the SRPWQMP, the Regional Water Board Executive Officer issued two information requests in October 2018 and June 2019 to the lily bulb growers to obtain information on their agricultural and pesticide application practices. The growers submitted timely information, which has been critical in developing a workable program of implementation to be documented in the SRPWQMP and in refining the water quality monitoring plan in preparation for upcoming sampling this winter and spring.

Since the release of the January 2018 monitoring report, the growers have been implementing new and refined practices to control discharges of agricultural chemicals reaching surface waters. Growers have reduced the size of lily bulb fields in order to maintain greater setbacks from streams and have planted grassed filter strips to remove sediments and pesticides in storm runoff from fields. Growers have also lowered their copper application rates by using a different formulation and have adjusted their pesticide applicators to reduce the potential for drift.

**DISCUSSION:** This presentation will update the Regional Water Board on progress since the February 2019 Board meeting, provide an overview of the main elements of the SRPWQMP as drafted to date, and provide a timeline for the public review process leading up to approval by the Executive Officer. More detailed information on each section of the draft Plan can be found in Attachment 1. The purpose of the presentation is to provide information and to get input from the Regional Water Board, stakeholders, and the public.

It is the intent of the Regional Water Board staff to use the final SRPWQMP as the basis for the development of a permit to address discharges of waste from lily bulb operations in the Smith River Plain. Moving forward after permit adoption, Regional Water Board staff envision the SRPWQMP to continue to function as an adaptive management tool and a comprehensive plan for the area that will guide permit compliance for lily bulb operators and coordinate watershed restoration activities.

The goals of the SRPWQMP are as follows:

1. Provide the logistical and communication support to participating parties, providing descriptions of roles and responsibilities in a transparent manner. The SRPWQMP will document and communicate the results of the adaptive management process used to develop water quality protection measures to address the effects and risks from discharges associated with lily bulb cultivation.
2. Include actions to address water quality problems identified through Regional Water Board, NMFS, and CDFW monitoring and lead to attainment of water quality standards in the Smith River Plain.
3. Describe lily bulb operations including current and planned water quality management practices to control associated discharges of waste to waters of the State.
4. Coordinate the Regional Water Board's programs and regulations with other water quality programs and restoration initiatives in the Smith River Plain.

5. Establish and implement an adaptive management water quality monitoring plan that will support the following objectives: 1) evaluate potential discharges from lily bulb operations by comparison of downstream station results with upstream “background” stations; 2) evaluate the effectiveness of water quality management practices implemented by lily bulb growers; and 3) provide the data necessary to run the Biotic Ligand Model, which is being used to inform the toxicity endpoints in the SRPWQMP.
6. Establish a system of public reporting for lily bulb growers to document the implementation of water quality practices on an annual basis.
7. Facilitate stakeholder input to adaptively manage the SRPWQMP and make improvements as needed.
8. Provide a foundation for the development of a future permit to regulate discharges associated with lily bulb operation in the Smith River Plain.

Staff anticipate an administrative draft of the SRPWQMP will be available for review by the development team partners in January 2020. Following their review and subsequent revisions, a draft will be released to the public for review and comment. After consideration of public input, the SRPWQMP will be submitted to the Executive Officer for final approval. The Regional Water Board plans to utilize the SRPWQMP, once approved, to guide development of general waste discharge requirements (WDRs) or a waiver of WDRs (permit) consistent with Water Code requirements, the requirements of the Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (State Nonpoint Source Policy), the Statement of Policy with Respect to Maintaining High Quality of Waters in California (State Antidegradation Policy), and requirements the State Water Board has established for irrigated lands regulatory programs.<sup>2</sup> The development of the permit will include a separate stakeholder engagement process and public comment period. Permit development will also require an evaluation and preparation of the appropriate documentation necessary to ensure compliance with the California Environmental Quality Act (CEQA). To ensure the protection of water quality from discharges of waste associated with lily bulb operations while the SRPWQMP is being finalized and the permit is being developed, Regional Water Board staff will continue to conduct field inspections, implement the adaptive management monitoring plan, document practices with photographs, and will periodically report to the Regional Water Board.

**SUPPORTING DOCUMENT:** Attachment 1 – Contents of the Smith River Plain Water Quality Management Plan

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<sup>2</sup> See State Water Board Order No. 2018-0002, usually referred to as the “East San Joaquin Order”.