

# Irrigated Lands Regulatory Program Petition of East San Joaquin WDRs State Water Board Workshop



#### Outline

- ILRP Background and Successes
- East San Joaquin Petition
  - Surface water monitoring
  - CV-SALTS and drinking water
  - Overarching concerns
  - Requirement time-lines
- Recommendation Summary

## Irrigated Lands Regulatory Program



## Stakeholder Engagement



- Over 14 years
- Transparent process
- Comprehensive CEQA
- Evaluated cost and workload versus need for monitoring and reporting













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#### Irrigated Lands Regulatory Program - Success Stories



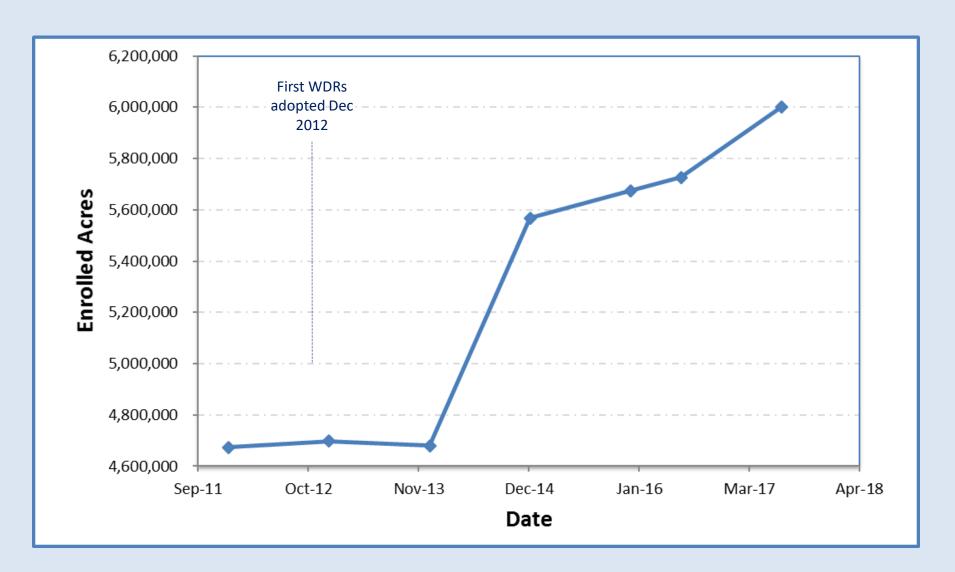
- Cal/EPA
- State & Regional Water Boards
- · Laws & Regulations
- Plans & Policies
- Programs
- Decisions Pending and Opportunities for Public Participation

#### IRRIGATED LANDS REGULATORY PROGRAM

- ILRP Home Page
- · Press Releases
- ILRP WDRs
- Frequently Asked Questions
- · Coalition Groups
- · Forms and Templates
- Coaliton Submittals
- Monitoring Data

www.waterboards.ca.gov/centralvalley/water issues/irrigated lands/success stories

## ILRP Success Enrolled acreage up 28% since 2012



## **Surface Water Monitoring**

- Supports receiving water monitoring
- Questions representativeness
- Questions spatial and temporal density
- Proposes to convene expert panel



#### Surface Water Monitoring

#### Central Valley Water Board Questions

- Thorough consideration of monitoring strategy?
  - Technical experts involved in development
  - 2007 Monitoring Design Guidance utilized
  - Monitoring history also guides monitoring design
  - New pesticide evaluation protocol accounts for spatial and temporal differences in pesticide use
- Basis for concern density and representativeness?
- Statewide approach to address hydrologic complexities of numerous unique watersheds?

#### Surface Water Monitoring

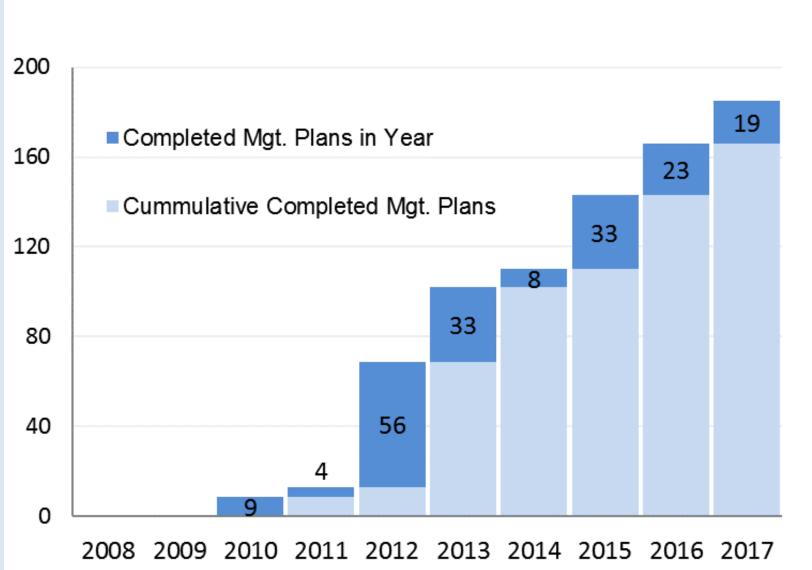
## Addressing State Water Board Concerns External audit of surface water monitoring

- Better follows Agricultural Expert Panel's direction to clearly understand watershed hydrology
- Best to address coalition by coalition and not statewide
- Addresses representativeness and density questions
- Addresses NPS Policy compliance
- Provides transparent process with ample opportunity for public input
- Provides more timely process than expert panel

#### **Current Surface Water Program**

- ~ 650 management plans addressing exceedances
- ~180 plans completed
  - Outreach to applicable members
  - Implementation of appropriate practices
  - Demonstration of practice effectiveness, or
  - Demonstrate that ag does not cause or contribute
- 303(d) Delisting of impairments
  - Improved water quality
  - Recognized alternative to TMDLs

## Completed Management Plan



## **Drinking Water Well Monitoring**

- Clarify replacement water expectations
- Recognize and support CV-SALTS effort as key program to provide safe drinking water



#### **CV-SALTS**

#### Central Valley Salinity Alternatives for Long-Term Sustainability

Stakeholder-driven effort to develop a sustainable salt and nitrate management plan with following goals:

- Safe drinking water,
- Balanced salt and nitrate loading, and
- Managed aquifer restoration where practicable, reasonable and feasible.

#### **Overarching Concerns**

- Individual management practice reporting for all NPS programs – not needed, concerns regarding impacting other programs
- Approval of N removed coefficients best achieved through collaboration with CDFA
- "A/Y Outliers" Process for State Water Board to work with Central Valley Water Board on future issues
- Annual reporting to State Board request for flexibility

#### **Overarching Concerns**

- A/Y Targets unclear how this will work
  - Central Valley Water Board directed to develop by crop
  - Coordination with other regions and State Board
- Request for flexibility
  - Farm evaluations
  - Sediment erosion control plans

#### Timing of New Requirements

- INMP requirements for low vulnerability areas
  - Certification and summary reporting for all
  - Capacity issues (limited CCAs and trainers)
  - Certification low priority and resource intensive
- New Temples: (INMP, INMP SR, MPIR)
  - Time to finalize and for coalition to outreach
  - Request implementation in 2019

#### Recommendation Summary

- Surface water monitoring
  - Addition of external audit instead of expert panel
  - Recognition of NPS Policy compliance with this addition
- Drinking Water Well Monitoring
  - Recognize and support CV-SALTS to provide drinking water
- Recommended language comment letter