

Impacts of equal vulnerability in the draft order

California Rice Commission

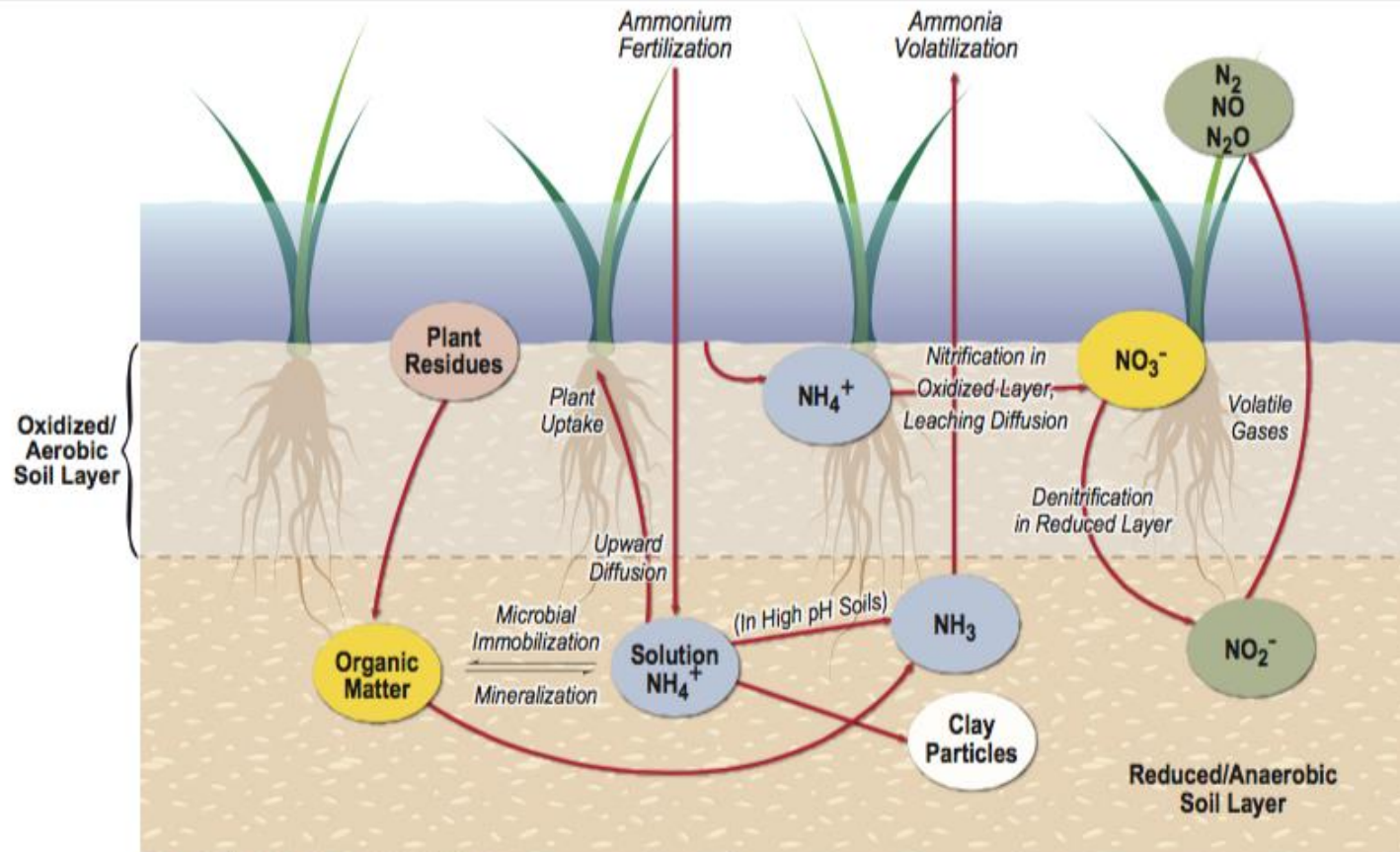
Sacramento Valley Water Quality Coalition

Westside San Joaquin River Watershed Coalition

Key points

- Treats all area and crops as having same potential to impact ground water quality
- Fails to allow for the recognition of developed data showing current practices do not impact ground water quality
- Fails to recognize crop stability

CA Rice – Low Potential



Source: Modified from Figure 4.2, UC-ANR 2010.

NOT TO SCALE

FIGURE 2-3
Nitrogen Transformations in Flooded Soils
Rice-Specific Groundwater Assessment Report

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CA Rice – Developed Data

Final

Rice-Specific Groundwater Assessment Report

Prepared for
Central Valley Regional Water Quality Control Board
On Behalf of
California Rice Commission

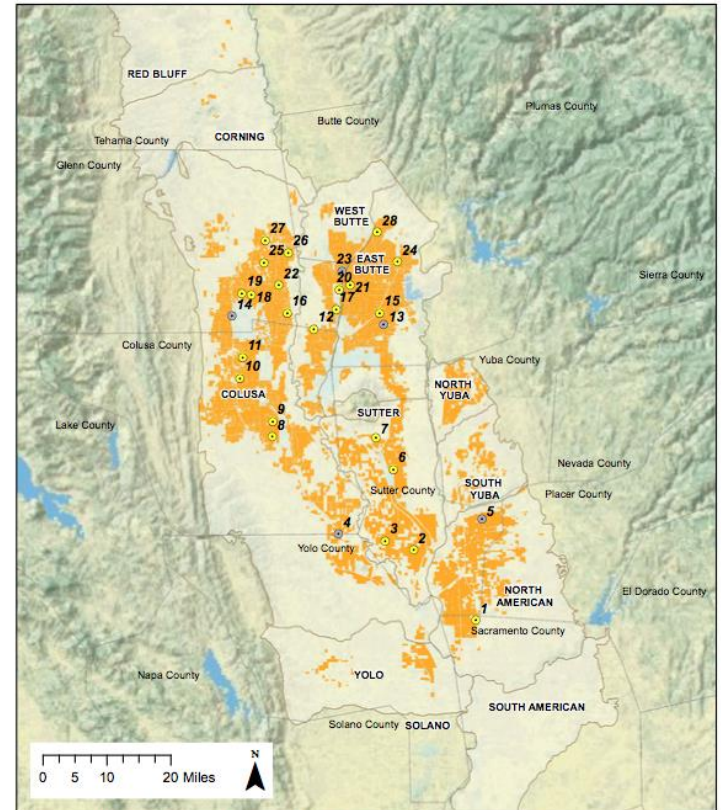
July 2013

CH2MHILL®

2485 Natomas Park Drive Suite 600, Sacramento, CA 95833

PLANTIERRA

1324 Whittier Dr., Davis, CA 95618



Data Sources: Groundwater Basins, Rice Crop (California DWR 2010); Basemap, County (ESRI 2011); USGS (2001a). Datum is NAD83.

Legend

USGS Rice Wells
● Active Monitoring Well
⊙ Abandoned Monitoring Well

□ County Boundary
□ Groundwater Basins
■ Rice Lands (DWR)

MAP 3-1

USGS Rice Wells Network

Rice-Specific Groundwater Assessment Report

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CRC_GAR_Fig3-1USGSRiceWellNetwork sbundy 4/30/2012

CA Rice - Crop Stability



Impacts of = vulnerability

- Elimination of differential vulnerabilities translates into:
 - Annual submission of the farm evaluation
 - Addition of certified irrigation management plan
 - Addition of a certified nutrient management plan
 - Annual submission of nutrient management plan summary data

Recommendation

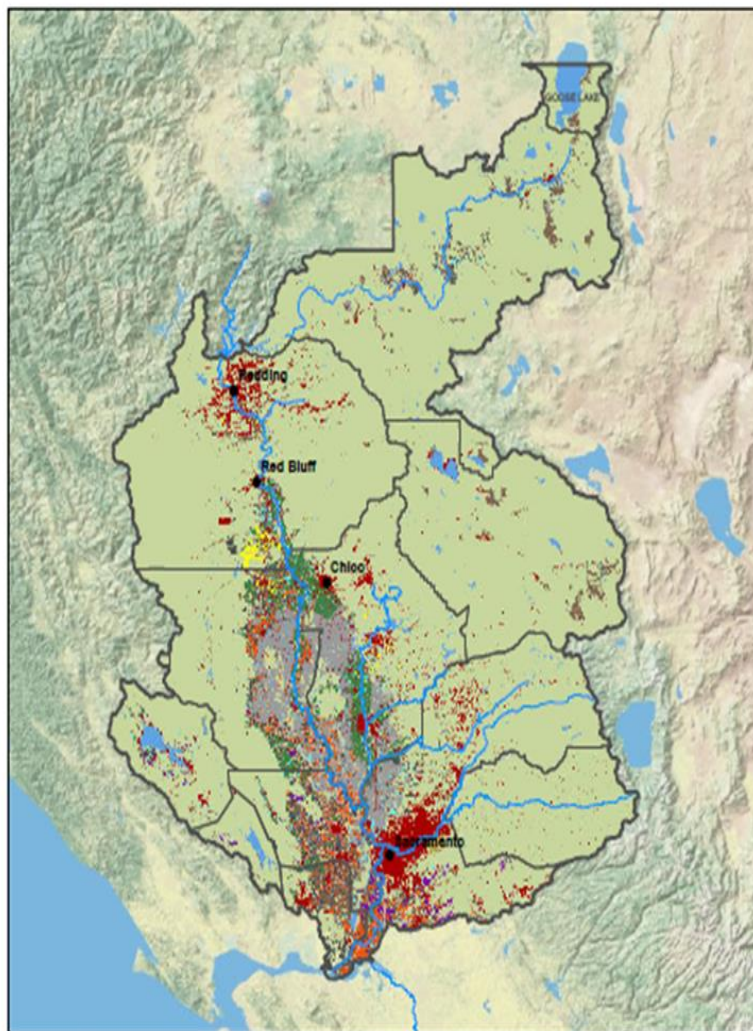
- Recommendation for areas with:
 - Low potential to impact GW quality
 - Demonstrate GW quality not impacted
 - Stable cropping pattern
- Current WDRs protective of GW quality
- If additional requirements:
 - 3 year CE for specific crop/regional GW BMP's

Regional Agricultural and Aquifer Characteristic

Bruce Houdesheldt

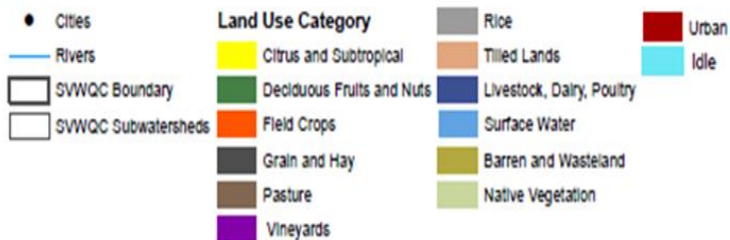
Sacramento Valley Water Quality Coalition





Source: Land Use by County (DWR 2013); Subwatersheds (SVWQC 2013); Basemap, City, County, River (EDRI 2013). Datum is NAD83.

LEGEND







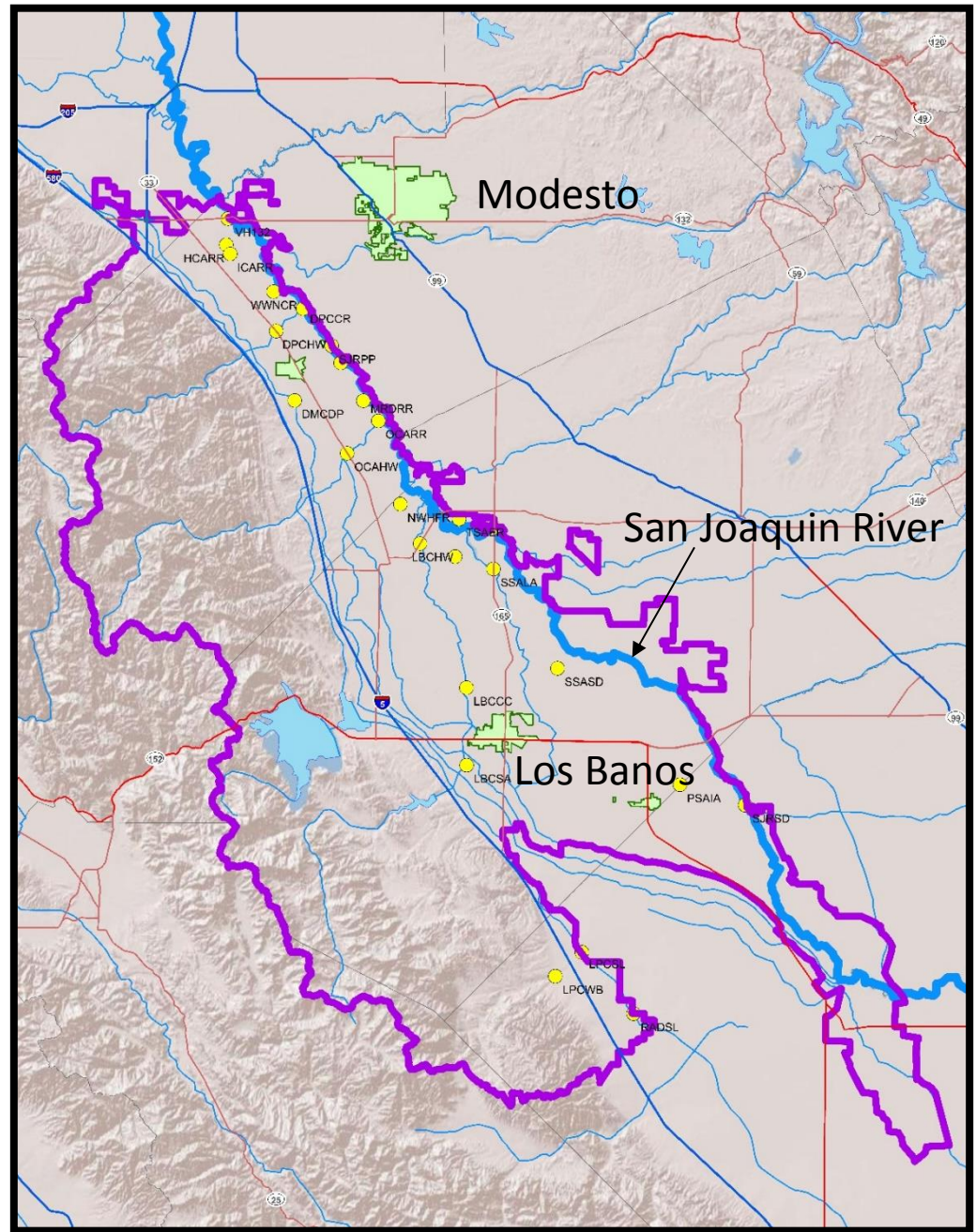
Westside San Joaquin River Watershed Coalition

Comments to State Water Resources
Control Board on proposed changes to
Eastside Order

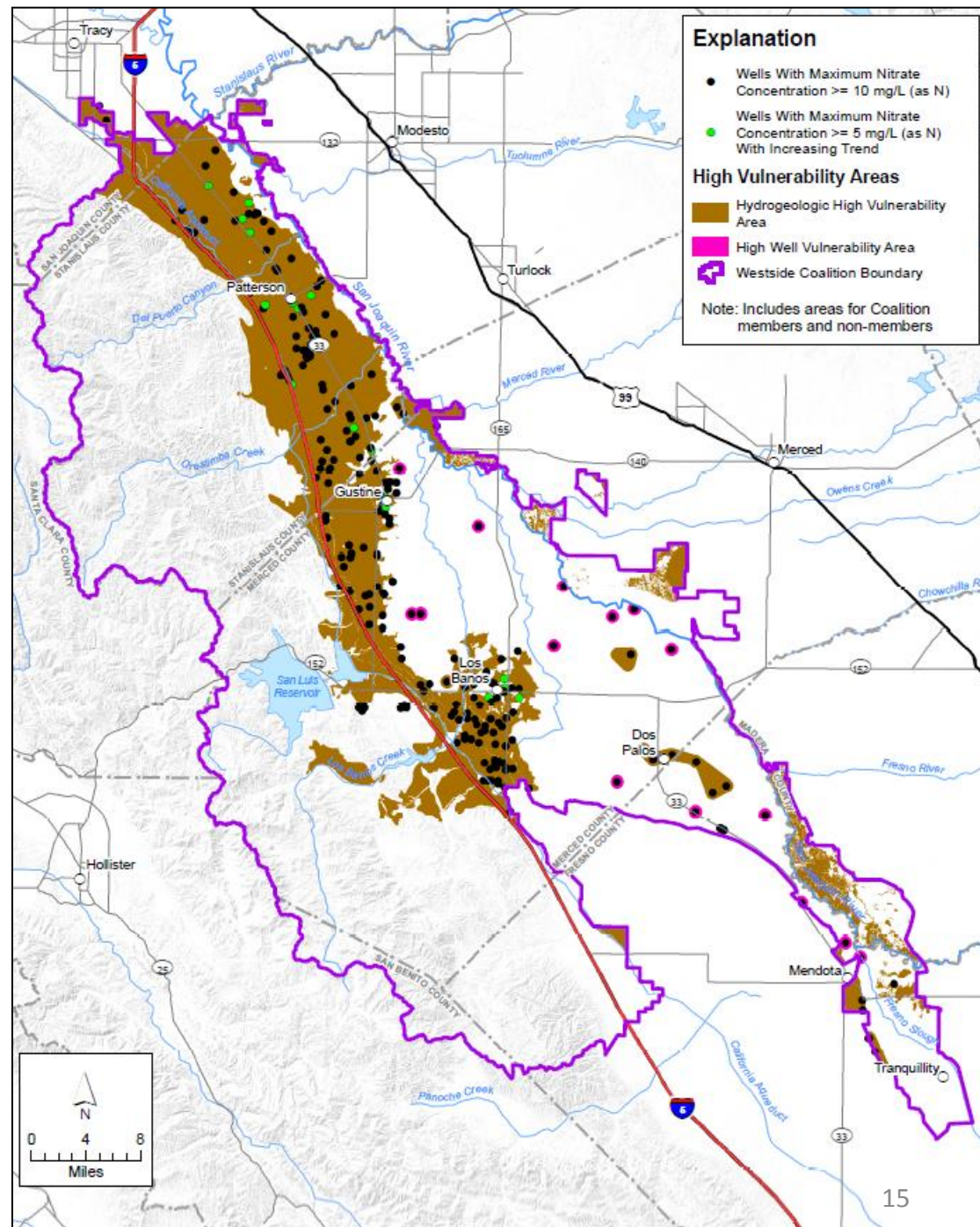
Joseph C. McGahan
Watershed Coordinator

Westside San Joaquin River Watershed Coalition

Boundary Map with
Monitoring Locations



High Vulnerability Area with the Potential to Discharge Nitrates to Groundwater



- Current Groundwater High Vulnerability 49% based on groundwater assessment report
- Vulnerability distinctions allow growers, the Coalition and the Regional Board to focus on important water quality issues
- Elimination of vulnerability distinctions dilutes efforts to address water quality problems
- The current order allows the Regional Board to modify lower priority area requirements later as necessary
- Recommendation: Keep the current vulnerability designations

- Growers are already submitting FEP and NMP Summary Reports
- Growers are getting used to the reporting and record keeping requirements
- Our Coalition spends considerable time overcoming fear and frustration with current requirements
- Changing program now discredits the efforts of the Westside Coalition
- Recommendation: Let the current program continue for 3-5 year period and ask the Regional Board to reassess at that time

Conclusion

- Not all crops, regions, ground water basins have equal risk
- Benefit to State Board, Regional Boards and dischargers to recognize and chart path forward