

## Central Valley Regional Water Quality Control Board

17 December 2024

David Guy, President  
Northern California Water Association  
455 Capitol Mall, Suite 703  
Sacramento, CA 95814

### APPROVAL OF SACRAMENTO VALLEY WATER QUALITY COALITION'S 2024 HIGH VULNERABILITY AREA UPDATE

Thank you for submitting the 19 August 2024 Sacramento Valley Water Quality Coalition 2024 High Vulnerability Area Update (2024 HVA Update). The 2024 HVA Update was submitted to meet the requirements of *Waste Discharge Requirements General Order for Growers in the Sacramento River Watershed that are Members of a Third-Party Group*, Order R5-2014-0030-11 (Order).

Central Valley Water Board staff requested a technical memorandum detailing the updates made; the technical memorandum was received 22 November 2024

Staff review finds that the 2024 HVA Update meets Order requirements; therefore, the 2024 HVA Update is approved.

If you have any questions, please contact Olivia Mathews by e-mail at [Olivia.Mathews@waterboards.ca.gov](mailto:Olivia.Mathews@waterboards.ca.gov).

Sincerely,

Adam Laputz  
Digitally signed by Adam  
Laputz  
Date: 2024.12.17 15:22:52  
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Water Boards

Patrick Pulupa  
Executive Officer

Enclosure: Staff Review Memorandum

Cc: Bruce Houdesheldt, Northern California Water Association

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## Central Valley Regional Water Quality Control Board

**TO:** Petra Lee  
Senior Environmental Scientist  
Irrigated Lands Regulatory Program

**FROM:** Olivia Mathews  
Environmental Scientist  
Irrigated Lands Regulatory Program

**DATE:** 2 December 2024

**SUBJECT:** **REVIEW OF SACRAMENTO VALLEY WATER QUALITY  
COALITION'S 2024 HIGH VULNERABILITY AREA UPDATE**

On 19 August 2024, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) received the Sacramento Valley Water Quality Coalition 2024 High Vulnerability Area Update (2023 HVA Update). The 2023 HVA Update was submitted to meet the requirements of *Waste Discharge Requirements General Order for Growers in the Sacramento River Watershed that are Members of a Third-Party Group*, Order R5-2014-0030-11 (Order).

Central Valley Water Board staff requested a technical memorandum detailing the updates made; the technical memorandum is dated 22 November 2024.

This review memorandum provides a summary of the 2024 HVA Update followed by staff recommendations.

## Background

The Groundwater Quality Assessment Report (GAR) requirements are described in Order provision VIII.F.3, as well as Order Attachment B, Monitoring and Reporting Program (MRP) section IV.B. The Order requires that the groundwater (GW) high vulnerability area (HVA) designation be updated every five years in the GAR (5-Year GAR Update). The most recent 5-Year GAR Update for the Sacramento Valley Floor Area was completed in 2022. The 5-Year GAR Update for the Upper Watershed Areas was completed in 2023. The Coalition additionally proposed updating the HVA annually based on newly enrolled irrigated lands which overlie the Hydrogeologically Sensitive Area (HSA). The 5-Year GAR Update will further include evaluation where nitrate Maximum Contaminant Level (MCL) exceedances are measured in the Irrigated Lands

Regulatory Program (ILRP) Drinking Water Well Monitoring Program (DWWMP) to expand the HVA to include those areas as necessary.

The 2024 HVA Update includes updates to the HVA based on newly enrolled lands which overlie the HSA, as is required on an annual basis.

HVA designation is significant because some ILRP requirements are different for members within a designated HVA, such as certification of Irrigation and Nitrogen Management Plans (INMPs). Members in the HVA are also responsible for implementing the Groundwater Quality Management Plan (GQMP) and reporting progress annually in the Management Practice Implementation Report (MPIR). It is essential that the Coalition knows which member parcels are in the GW HVA so they can notify members of specific requirements for timely compliance with the Order by both members and the Coalition.

## **Summary of the 2024 HVA Update**

Newly enrolled irrigated lands that overlie the HSA were added to the HVA. This aligns with the process identified in the 2022 5-Year GAR Update.

Using the most recently available GIS layer of parcels enrolled in the Coalition from 2023, newly enrolled irrigated lands that overlie the HSA were added to the HVA. No areas previously included in the HVA were removed in the update, even if some previously enrolled irrigated lands were no longer enrolled in the Coalition. In total, 1,826 acres of newly enrolled irrigated lands were added to the HVA.

## **Updated HVA**

With the addition of 1,826 acres of land based on the newly enrolled irrigated lands overlying the HSA, the total area of the 2024 HVA is 643,133 acres.

## **Future HVA Updates**

The HVA will be updated annually to include newly enrolled irrigated lands which overlie the HSA and submitted to Central Valley Water Board staff as part of the Annual Monitoring Report (AMR) for the Groundwater Quality Trend Monitoring Program (GQTMP), submitted on May 1.

Additionally, DWWMP data will be reviewed during the 5-Year GAR Update to expand the HVA where nitrate MCL exceedances are measured within the Sacramento Valley Floor Area. The Coalition will periodically conduct vulnerability assessments of the Lake subwatershed in future 5-Year GAR Updates using publicly available data.

## **Staff Review and Recommendations**

Staff recommends approval of the 2024 HVA Update.