



Step 2: Review Water Quality Issues and TMDLs in Your Area

Water quality in the Santa Clara River Reach 5 RA is assessed using data one VCAILG monitoring site. This site evaluates compliance with standard Ag Order benchmarks and applicable Total Maximum Daily Loads (TMDLs):

Table 1. Monitoring Sites Used for Comparison to Applicable Benchmarks/TMDLs in the Santa Clara River Reach 5 RA

Monitoring Site	Site Type	Applicable Benchmarks / TMDLs
S04T_TAPO	VCAILG Monitoring Site (<i>evaluates standard Ag Order benchmark attainment and TMDL load allocation compliance</i>)	Standard Ag Order Benchmarks
		Santa Clara River (SCR) Nitrogen TMDL
		SCR Bacteria TMDL
		Upper SCR Chloride TMDL

What's the difference between Ag Order benchmarks and TMDLs?

Ag Order benchmarks apply to all VCAILG enrolled parcels and include a broad list of water quality constituents identified in Appendix 4 of the Ag Order (e.g., nitrogen, pesticides, metals). TMDLs are an added regulatory layer that apply in areas where runoff drains to impaired water bodies with adopted TMDL plans. These include specific limits—called load allocations—on how much of a pollutant can be discharged.

Your Responsibility:

As a grower, you are responsible for implementing appropriate Management Practices (MPs) to address water quality issues in your RA. Table 2 below summarizes the key water quality issues and associated Total Maximum Daily Loads (TMDLs), along with the applicable compliance date, that apply to this area (if applicable).

How RAs Were Created:

VCAILG established RAs based on Regional Water Board-defined TMDL boundaries. This means all parcels within an RA are subject to the same applicable TMDLs and are represented by the same monitoring sites.

To learn more about TMDLs, watch the TMDLs 101 Workshop: <https://youtu.be/66B6lxGBg3Q>. For a complete list of TMDLs that apply to agriculture, see Appendix 5 of the Ag Order.

Table 2. Water Quality Issues and TMDLs in Your Responsibility Area

Water Quality Issues in Your RA	TMDLs in Your RA
- Bacteria (<i>E. coli</i>) - Salts (TDS, sulfate, and chloride) due to local geology - Legacy Pesticides (organochlorine pesticides, e.g., DDT and chlordane) - Current Pesticides (bifenthrin)	- SCR Nitrogen TMDL (March 23, 2004) - SCR Bacteria TMDL (March 21, 2023 dry weather, March 21, 2029 wet weather) - Upper SCR Chloride TMDL (April 6, 2010) Natural source determination approved for Chloride TMDL, therefore exceedances of this TMDL will not trigger discharge limitations as described in Step 6.

Step 3: Maintain Required Compliance Documentation

Growers must keep the following documents on-site (electronic or digital copies are accepted):

Table 3. Required Documents

Required Documents <i>*Electronic or digital documents accepted</i>	
☒	VCAILG contact information: vcailg@farmbureauvc.com or (805) 289-0155 (fulfilled by this handout)
☒	Link to VCAILG Water Quality Management Plan (fulfilled by this handout) https://www.farmbureauvc.com/vcailg/water-quality-management-plan/
☐	Proof of VCAILG membership (such as your invoice or Clearwater account access)
☐	Pesticide information as required by other regulatory programs
☐	Copy of all completed Farm Evaluation Surveys (accessible in Clearwater)
☐	Copy of all Irrigation and Nutrient Management Plans (INMPs) (accessible in Clearwater)

Step 4: Complete the Required Actions for Ag Order Compliance

The following ongoing compliance requirements must be met according to the stated deadline, as noted below. **You can review your status of completing many of these required actions by logging into your Clearwater account.**

Table 4. Required Actions

Required Actions	
☐	Attend a minimum of 2 hours of educational training yearly.
☐	Complete the Farm Evaluation Survey for each enrolled parcel when notified by VCAILG (roughly every 3 years).
☐	Develop a certified Irrigation and Nutrient Management Plan (INMP) and maintain the document on farm (initially required March 1, 2025, and annually thereafter)
☐	Submit an Irrigation and Nutrient Management Report (INMR) to VCAILG via Clearwater (due March 1, 2026, and annually thereafter).
☐	Implement management practices (MPs) to address water quality benchmark exceedances noted in Table 2. Refer to Table 5 for a list of required and recommended MPs.
☐	For parcels subject to TMDL discharge limitations (check the TMDL tab in Clearwater), implement a Track 1 Monitoring and Reporting Plan or Track 2 Management Practice Plan according to the plan-specified schedule approved by the Regional Board (additional TMDL information found in Step 6).
☐	For parcels with on-farm drinking water supply wells, monitor and report the findings of nitrate sampling according to Appendix 8 of the Ag Order.

Growers must implement required Management Practices (MPs) and consider additional MPs to address water quality issues listed in **Table 2. Table 5** summarizes required MPs and provides recommendations for additional or expanded MPs on your farm.

Water Quality Issues						MPs	Implemented?
Bacteria		Salts ¹		Legacy Pesticides	Current Use Pesticides		
Dry Weather	Wet Weather	Dry Weather	Wet Weather	Wet Weather	Wet Weather		
Required for all agricultural operations in RA							
						Develop a certified Irrigation and Nutrient Management Plan (INMP) for each management unit on the property.	☐
Additional MP Recommendations							
						Source Control MPs	
X		X				Use efficient irrigation system (drip only, micro-sprinkler then drip, and micro-sprinkler)	☐
X		X				Avoid/prevent irrigation runoff	☐
						Structural MPs	
				X	X	Reduce bare soil in production area with cover crops, gravel, mulch, etc.	☐
				X	X	Minimize erosion on sloped areas with contour farming, contoured buffer strips, or terracing (sloped acres with erosion control/total sloped acres)	☐



Water Quality Issues						MPs	Implemented?
Bacteria		Salts ¹		Legacy Pesticides	Current Use Pesticides		
Dry Weather	Wet Weather	Dry Weather	Wet Weather	Wet Weather	Wet Weather		
				X	X	Minimize bare soil in non-cropped areas by using vegetation, mulch, or gravel	☐
X	X			X	X	Protect ditches from erosion using vegetation, rock placement or geotextiles, or wattles placed at intervals	☐
X	X	X	X	X	X	Use grassed waterways	☐
X	X	X	X	X	X	Use vegetated filter strips	☐
X	X	X	X	X	X	Runoff is treated with detention/sediment basins	☐
X	X	X	X	X	X	Runoff is treated with retention basins	☐
X	X	X	X	X	X	Runoff is treated with bioreactor	☐
X	X	X	X	X	X	Runoff is treated with constructed wetlands	☐

1. Excess salts in this RA are due to natural geological sources. MPs specific to salts constituents are not required, however MPs for other constituents may also reduce salts.

Step 6: Review Additional TMDL Requirements Checklist, If Needed

If TMDL load allocation exceedances occur at the monitoring site(s) for this RA after the compliance deadline, discharge limitations may apply. If this happens, you will receive a discharge limitation notification from VCAILG outlining next steps, as illustrated by the flowchart below:

For more information, review the **TMDL tab** on the Clearwater website and **Figure 1** below.

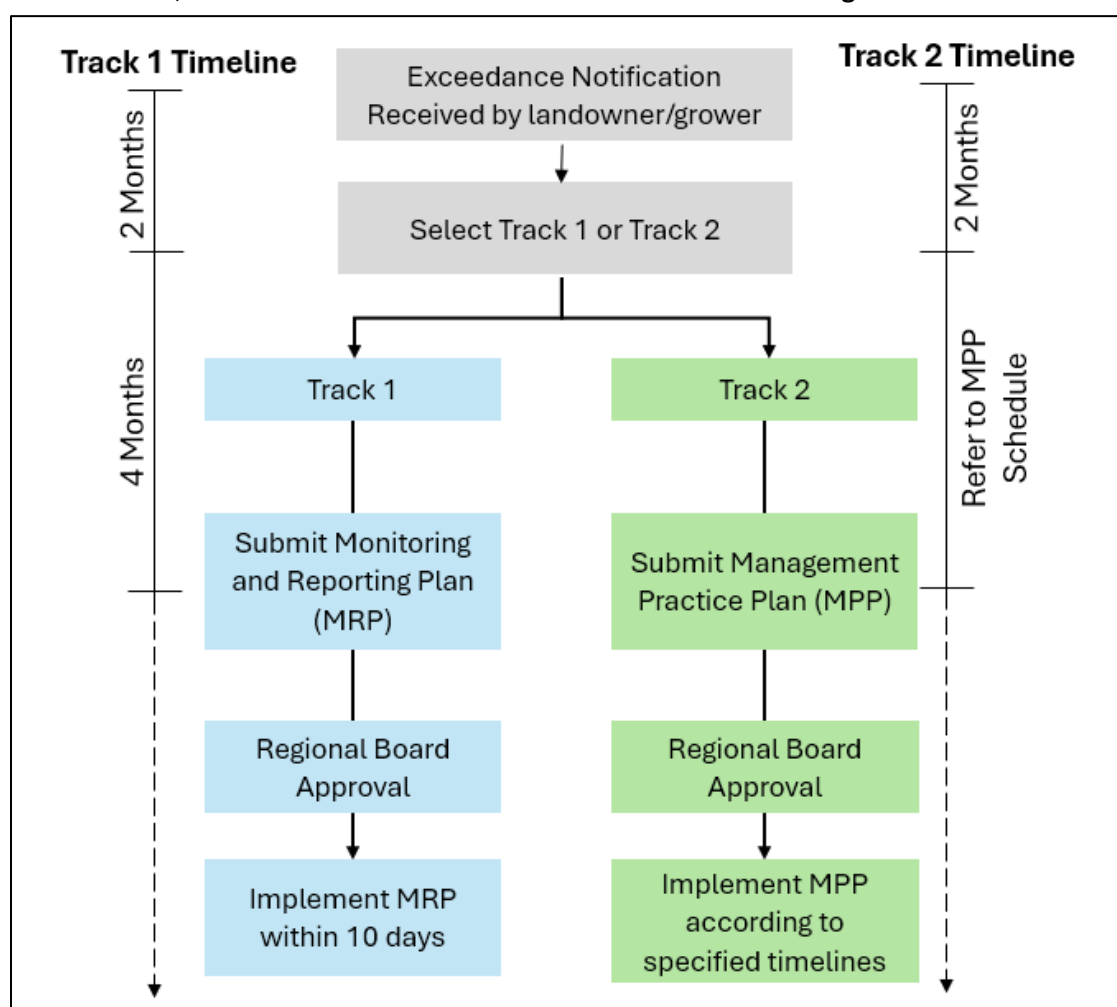


Figure 1. TMDL Discharge Limitations Compliance Track Timelines

Resources

Your property may be eligible for management practice funding through the USDA Natural Resources Conservation Service (NRCS). Call (805) 984-2358 for more information. There may be grant funding and other technical assistance available through the Ventura County Resource Conservation District (RCD). Current agricultural water programs can be found on the RCD website here: <https://vccrd.org/agricultural-water-conservation-programs/> and the main office phone number is (805) 764-5130.