

How to comply with the Ag Order for Properties in the Santa Clara River – Victoria and Gonzales Responsibility Area (RA)

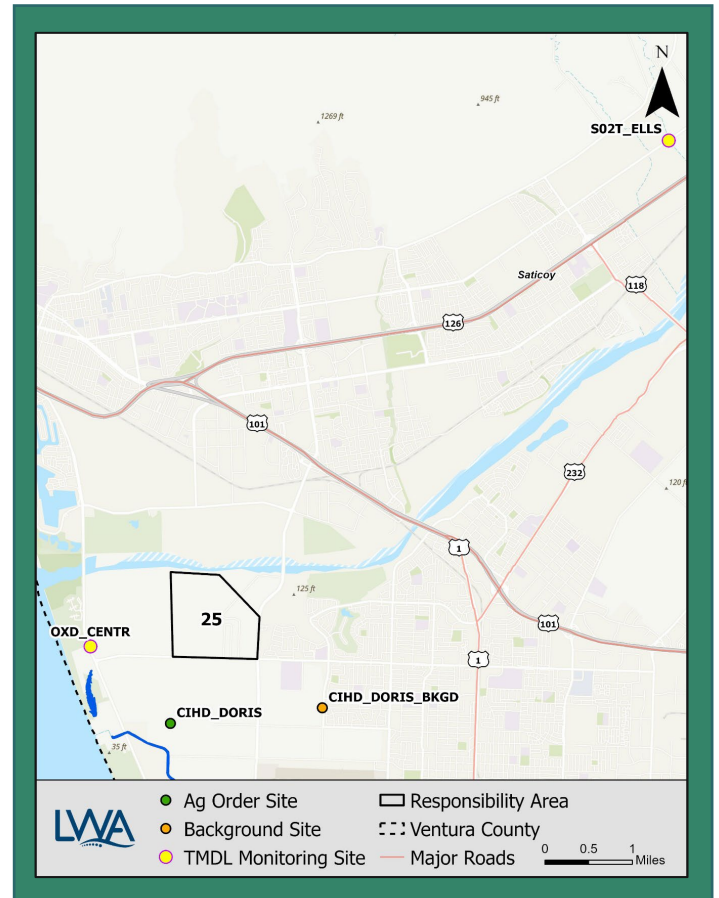
This compliance summary was developed as part of the Ventura County Agricultural Irrigated Lands Group (VCAILG) Water Quality Management Plan (WQMP)'s outreach to comply with the Ag Order and address persistent water quality issues found during sampling.

Step 1: Locate Your Parcel Information

Your first stop for information should be the [Clearwater](https://clearwater.vcailg.org/Account/Login) site (<https://clearwater.vcailg.org/Account/Login>) where you can find detailed information specific to your parcels. You can use Clearwater to:

- Determine which **Responsibility Area (RA)** your parcel(s) are located in.
- Update **VCAILG enrollment** and parcel information as needed.
- Access **resources and reporting platforms** for fulfilling compliance steps detailed below.

For assistance navigating Clearwater or retrieving login credentials, contact **VCAILG** at vcailg@farmbureauvc.com or **(805) 289-0155**.



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

Water quality in the Santa Clara River – Victoria and Gonzales RA is assessed using data from multiple VCAILG monitoring sites. These sites evaluate 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 – Victoria and Gonzales RA

Monitoring Site	Site Type	Applicable Benchmarks / TMDLs
CIHD_DORIS	VCAILG Monitoring Site (<i>evaluates standard Ag Order benchmark attainment</i>)	Standard Ag Order Benchmarks
CIHD_DORIS_BKGD	Background Site (<i>evaluates urban inputs upstream of VCAILG site CIHD_DORIS</i>)	Determines quality of water in the Doris Drain prior to agricultural discharges.
S02T_ELLS	TMDL Monitoring Site (<i>evaluates TMDL load allocation compliance</i>)	Santa Clara River (SCR) Nitrogen TMDL
		SCR Toxaphene TMDL
OXD_CENTR	TMDL Monitoring Site (<i>evaluates TMDL load allocation compliance</i>)	McGrath Lake Pesticides, PCBs, and Sediment Toxicity 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
- Nutrients (nitrogen compounds) - Legacy Pesticides (organochlorine pesticides, e.g., DDT, chlordane, and toxaphene)	- SCR Nitrogen TMDL (March 23, 2004) - SCR Toxaphene TMDL (October 7, 2025) - McGrath Lake Pesticides, PCBs, and Sediment Toxicity TMDL (June 30, 2021)

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.

Step 5: Implement Required Management Practices for the Santa Clara River – Victoria and Gonzales Responsibility Area

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.

Table 5. MP Implementation Requirements and Recommendations

Water Quality Issues			MPs	Implemented?
Nutrients	Legacy Pesticides			
Wet Weather	Dry Weather	Wet Weather		
Required for all agricultural operations in RA				
X			Develop a certified Irrigation and Nutrient Management Plan (INMP) for each management unit on the property.	☐
Additional MP Recommendations				
			Source Control MPs	
	X		Use efficient irrigation system (sum of drip only, micro-sprinkler then drip, and micro-sprinkler)	☐
	X		Test irrigation system for distribution uniformity by monitoring water delivery or pressure differences by block at least every 3 years.	☒
X			Conduct leaf/petiole tests and use results to apply the minimum necessary amount of fertilizer	☐
X			Analyze irrigation water nitrate and use results to adjust fertilizer application	☐
	X		Avoid/prevent irrigation runoff	☐
			Structural MPs	
X	X	X	Reduce bare soil in production area with cover crops, gravel, mulch, etc.	☐



Water Quality Issues			MPs	Implemented?
Nutrients	Legacy Pesticides			
Wet Weather	Dry Weather	Wet Weather		
X	X	X	Minimize erosion on sloped areas with contour farming, contoured buffer strips, or terracing (sloped acres with erosion control/total sloped acres)	☐
X		X	Minimize bare soil in non-cropped areas by using vegetation, mulch, or gravel	☐
X	X	X	Protect ditches from erosion using vegetation, rock placement or geotextiles, or wattles placed at intervals	☐
X	X	X	Use grassed waterways	☐
X	X	X	Use vegetated filter strips	☐
X	X	X	Runoff is treated with detention/sediment basins	☐
X	X	X	Runoff is treated with retention basins	☐
X	X	X	Runoff is treated with bioreactor	☐
X	X	X	Runoff is treated with constructed wetlands	☐

Bolded MPs are required by the Ag Order to the degree appropriate for achieving compliance with the McGrath Lake OC Pesticides and PCBs TMDL and Santa Clara River Estuary Toxaphene TMDL



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.

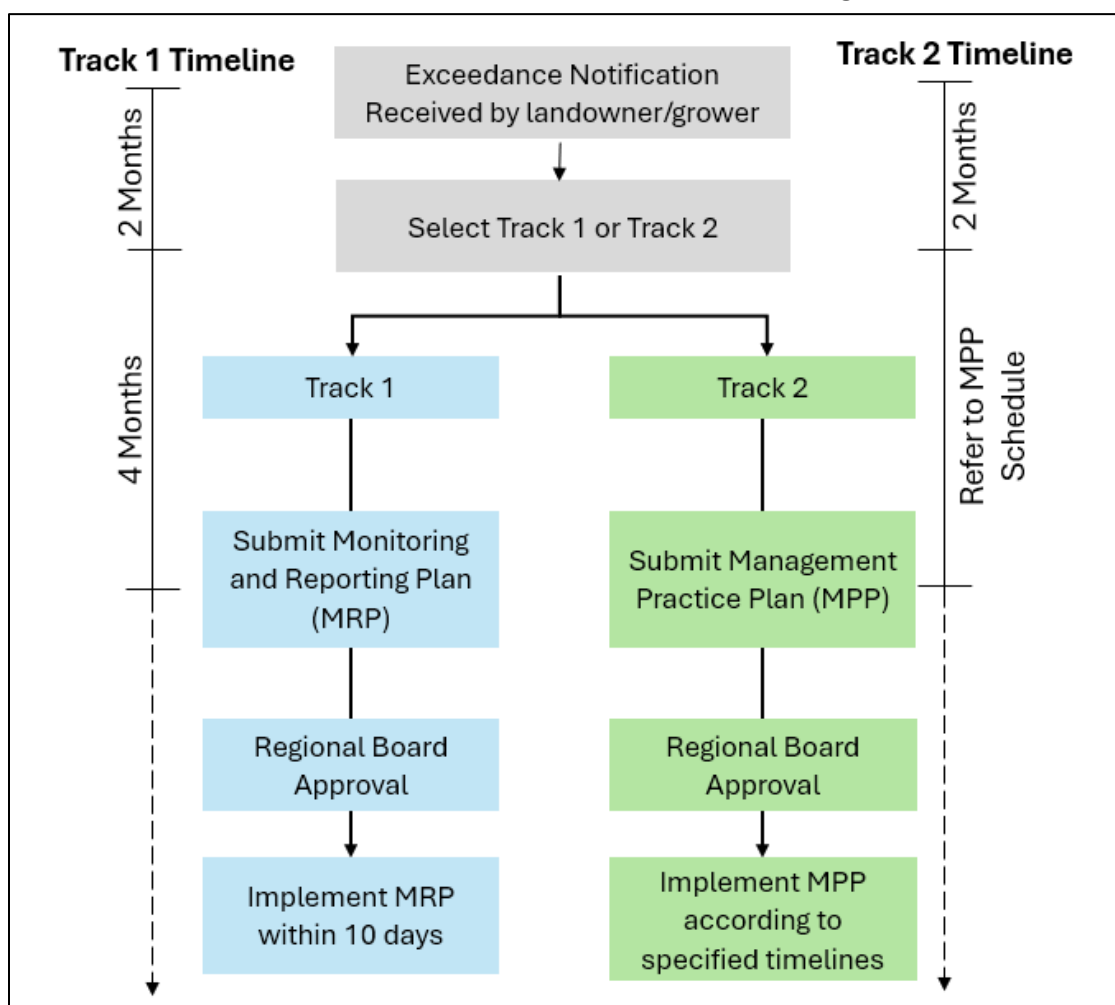


Figure 1. TMDL Discharge Limitations Compliance Track Timelines

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.