

How to comply with the Ag Order for Properties in the Calleguas-Howard Responsibility Area (RA)

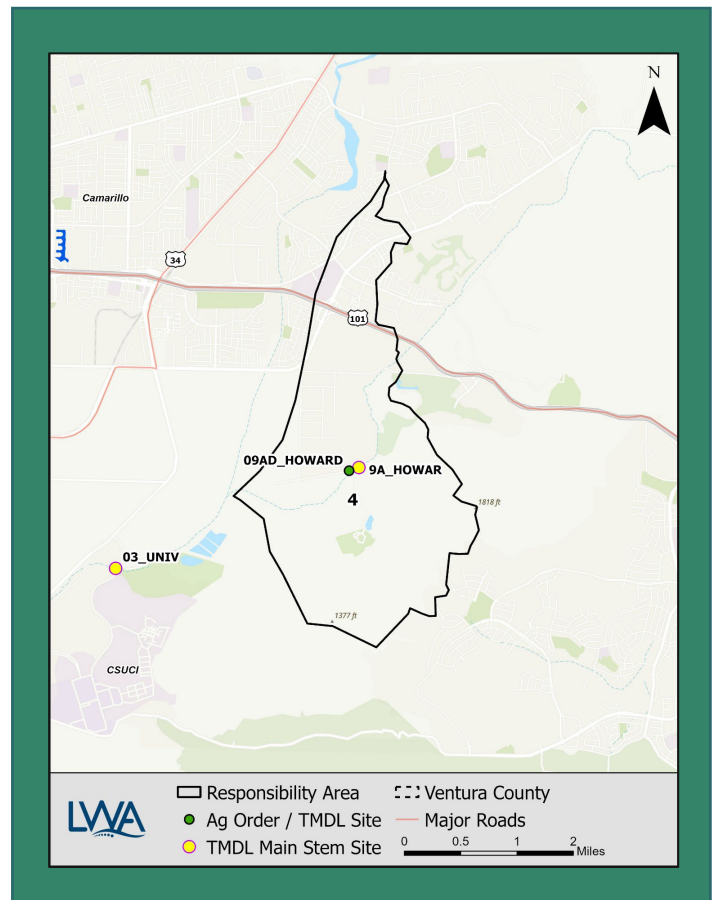
This compliance summary was developed as part of the Ventura County Agricultural Irrigated Lands Group (VCAILG) Water Quality Management Plan (WQMP)'s outreach to comply with the Ag Order and address persistent water quality issues found during sampling.

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 Calleguas-Howard 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 Calleguas-Howard RA

Monitoring Site	Site Type	Applicable Benchmarks / TMDLs
09AD_HOWARD	VCAILG Monitoring Site (<i>evaluates standard Ag Order benchmark attainment and some TMDL load allocation compliance</i>)	Standard Ag Order Benchmarks
		Calleguas Creek Watershed (CCW) Nitrogen TMDL
		CCW Toxicity, Chlorpyrifos, and Diazinon TMDL
		CCW Metals and Selenium TMDL
		CCW Salts TMDL
		CCW OC Pesticides and PCBs TMDL
9A_HOWAR	TMDL Monitoring Site (<i>evaluates water quality in main water body</i>)	CCW Salts TMDL
03_UNIV	TMDL Main Stem Site (<i>evaluates water quality in main water body</i>)	CCW OC Pesticides and PCBs
		CCW Metals 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
09AD_HOWARD is a new monitoring site, therefore data was not available to evaluate recent water quality issues. However, multiple TMDLs apply to this RA, therefore, it is important to implement MPs that address the TMDL constituents. Proactively implementing MPs will help achieve TMDLs and potentially avoid additional requirements.	• CCW Nitrogen TMDL (March 23, 2004) • CCW Toxicity, Chlorpyrifos, and Diazinon TMDL (March 24, 2016) • CCW Metals and Selenium TMDL (March 26, 2022) • CCW OC Pesticides and PCBs TMDL (March 24, 2026) • CCW Salts TMDL (December 23, 2023)

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 Calleguas-Howard 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		Metals		Legacy Pesticides		Current Use Pesticides		Salts		Toxicity			
Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry	Wet		
Required for all agricultural operations in RA													
X	X									X	X	Develop a certified Irrigation and Nutrient Management Plan (INMP) for each management unit on the property.	☐
Additional MP Recommendations													
												Source Control MPs	
X		X		X		X		X		X		Use efficient irrigation systems (drip only, micro-sprinkler then drip, and micro-sprinkler)	☐
X		X		X		X		X		X		Test irrigation system for distribution uniformity by monitoring water delivery or pressure differences by block at least every 3 years.	☐



Water Quality Issues												MPs	Implemented?
Nutrients		Metals		Legacy Pesticides		Current Use Pesticides		Salts		Toxicity			
Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry	Wet		
X		X				X		X		X		Implement irrigation practices that are based on soil moisture measurements and/or crop evapotranspiration	☐
X								X		X		Use soil solution electrical conductivity measurements to determine when salt leaching is necessary	☐
X	X									X	X	Conduct soil residual nitrate tests and use results to adjust fertilizer application	☐
X	X									X	X	Conduct leaf/petiole tests and use results to apply the minimum necessary amount of fertilizer	☐
X	X									X	X	Analyze irrigation water nitrate and use results to adjust fertilizer application	☐
						X	X			X	X	Use a pest control advisor (PCA) or certified qualified applicator for pesticide management decisions	☐
		X	X			X	X			X	X	Implement an integrated pest management plan	☐
X		X		X		X		X		X	X	Avoid/prevent irrigation runoff	☐
												Structural MPs	
X	X	X	X	X	X	X	X			X	X	Reduce bare soil in production area with cover crops, gravel, mulch, etc.	☐



Water Quality Issues												MPs	Implemented?
Nutrients		Metals		Legacy Pesticides		Current Use Pesticides		Salts		Toxicity			
Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry Weather	Wet Weather	Dry	Wet		
X	X	X	X	X	X	X	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		X		X			X	X	Minimize bare soil in non-cropped areas by using vegetation, mulch, or gravel	☐
X	X	X	X	X	X	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	X	X	X	X	X	X	Use grassed waterways	☐
X	X	X	X	X	X	X	X	X	X	X	X	Use vegetated filter strips	☐
X	X	X	X	X	X	X	X	X	X	X	X	Runoff is treated with detention/sediment basins	☐
X	X	X	X	X	X	X	X	X	X	X	X	Runoff is treated with retention basins	☐
X	X	X	X	X	X	X	X	X	X	X	X	Runoff is treated with bioreactor	☐
X	X	X	X	X	X	X	X	X	X	X	X	Runoff is treated with constructed wetlands	☐

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.

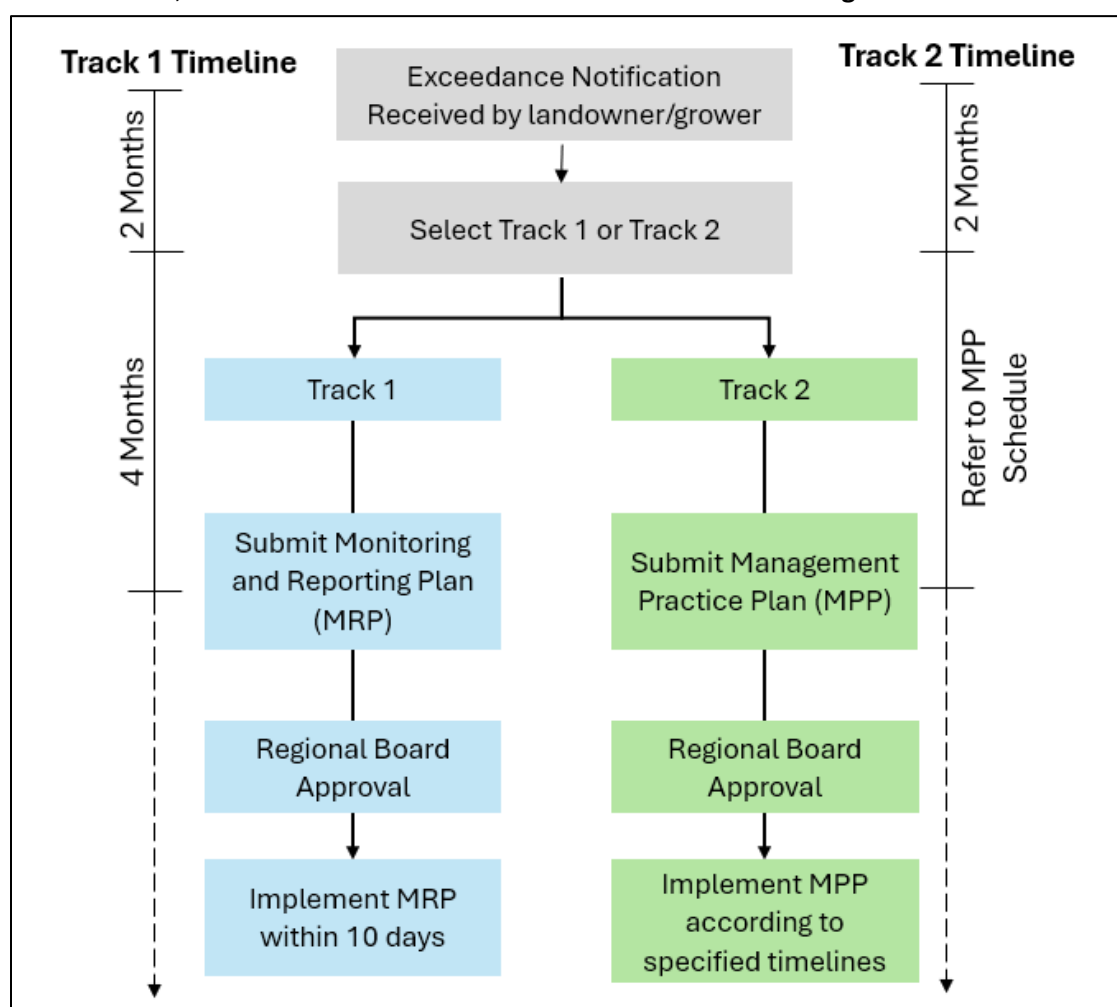


Figure 1. TMDL Discharge Limitations Compliance Track Timelines

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.