



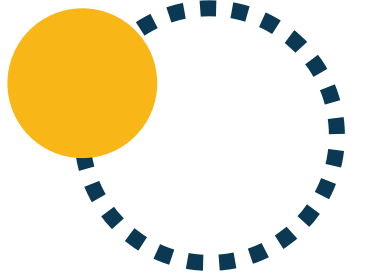
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# ILRP EXPERT PANEL UPDATE

For the Greater Monterey County IRWM

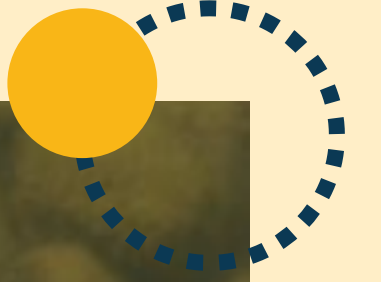


Elliot Grant, Senior Project Manager, Sustainable Conservation



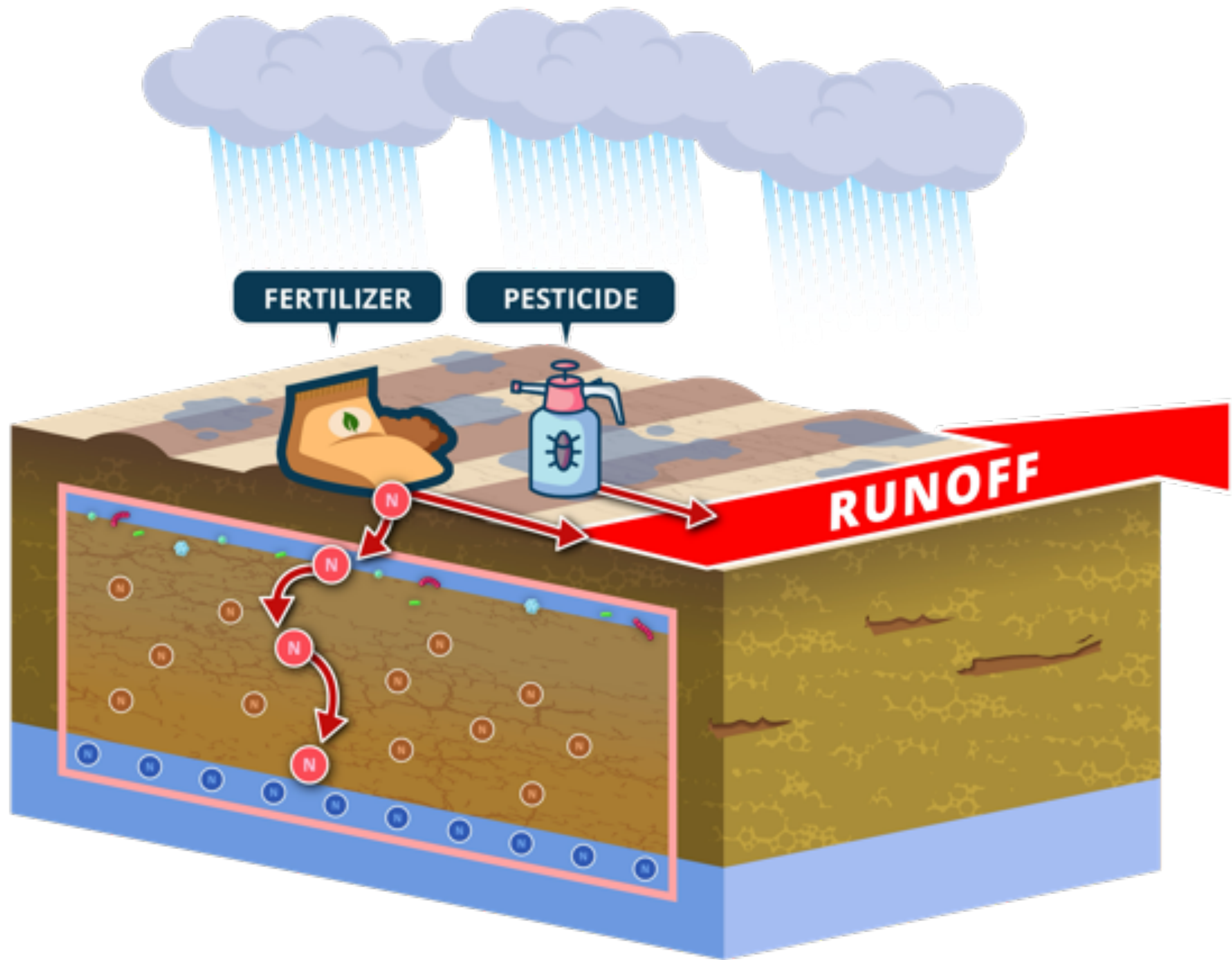
# TODAY'S AGENDA

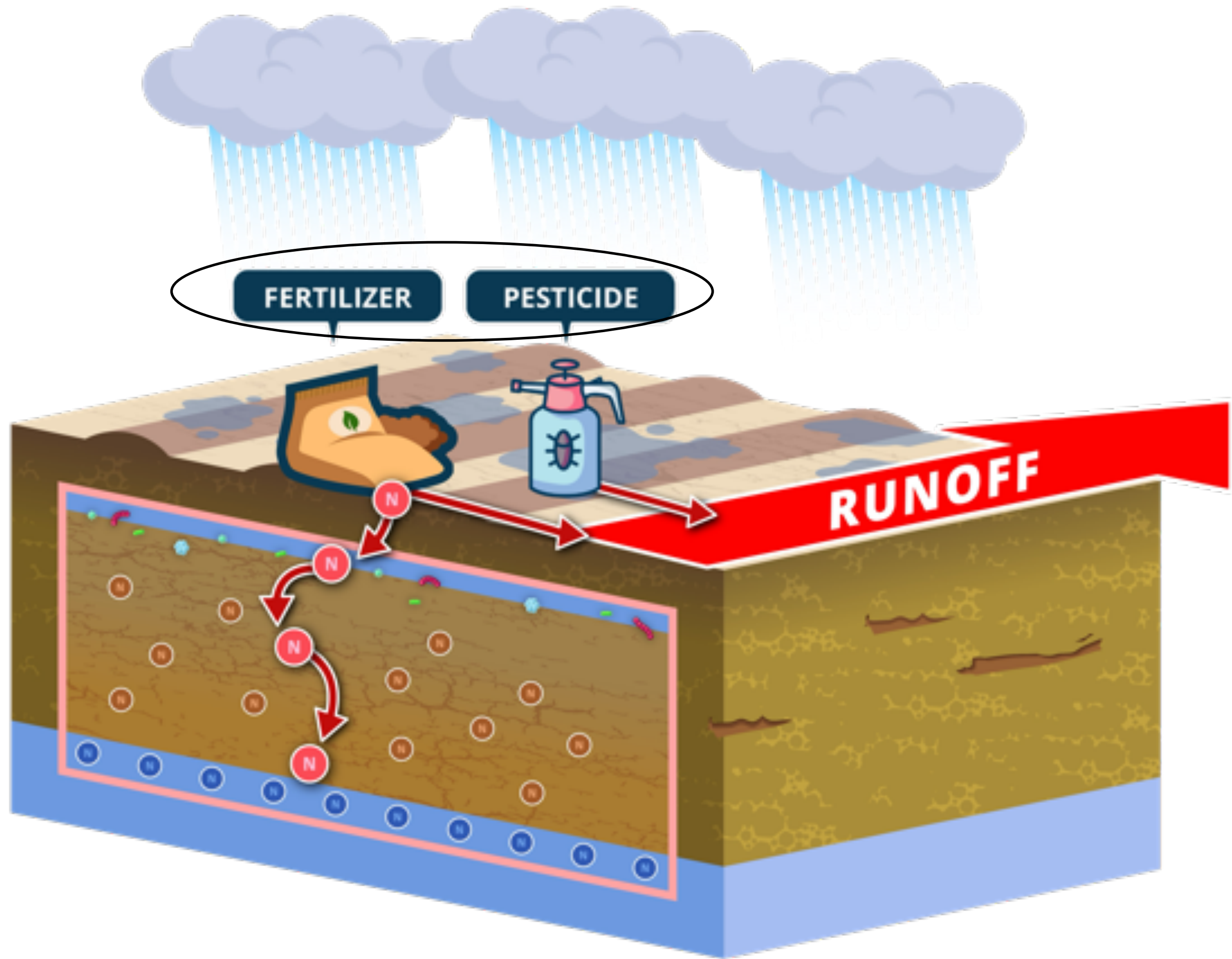
- 01 Intro to the Irrigated Lands Regulatory Program (ILRP) and the process for updating Waste Discharge Requirements (WDRs)
- 02 Rational for the Statewide Expert Panel
- 03 Current Panel recommendations and N management strategies
- 04 Questions and future engagement opportunities

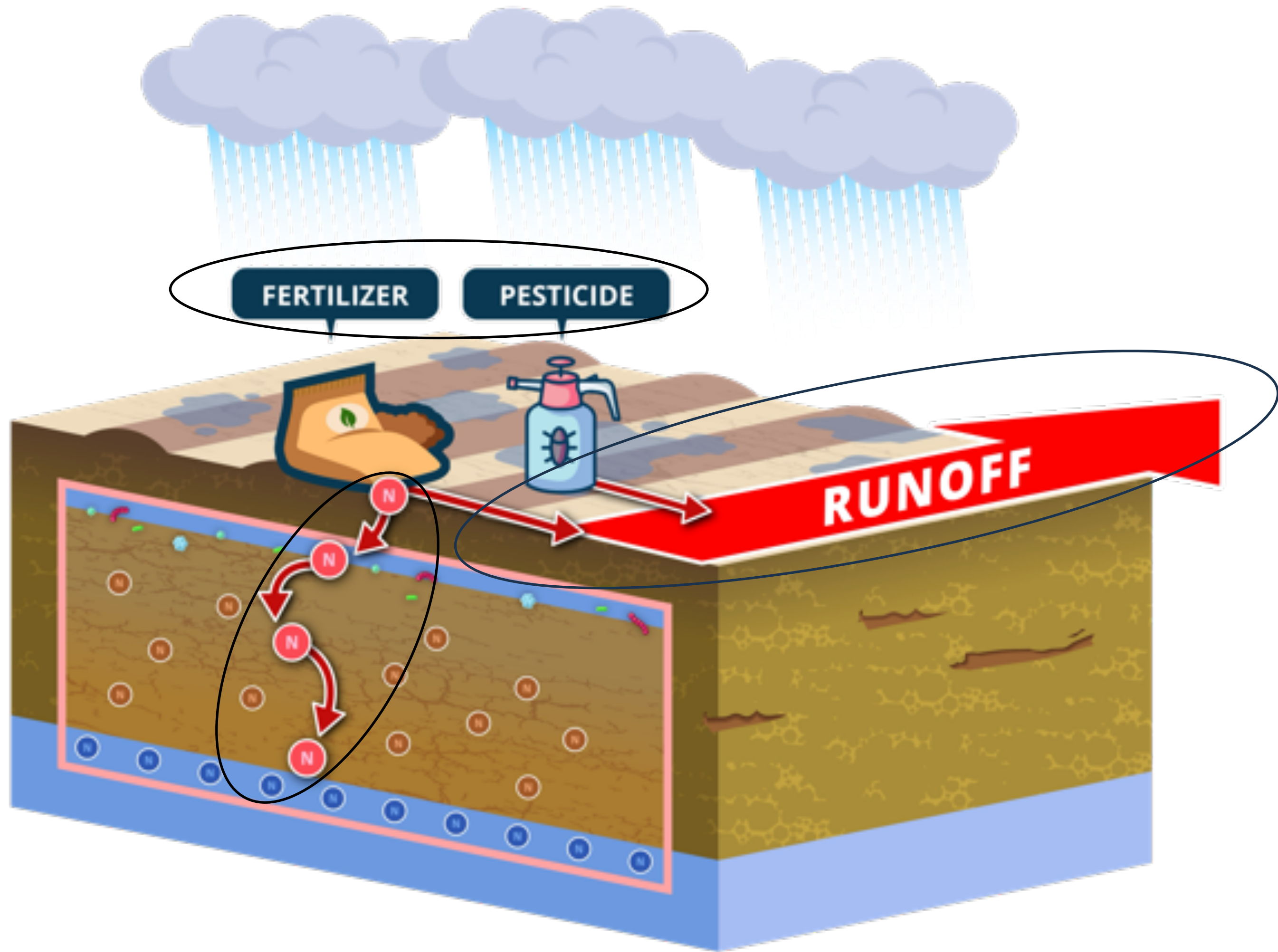


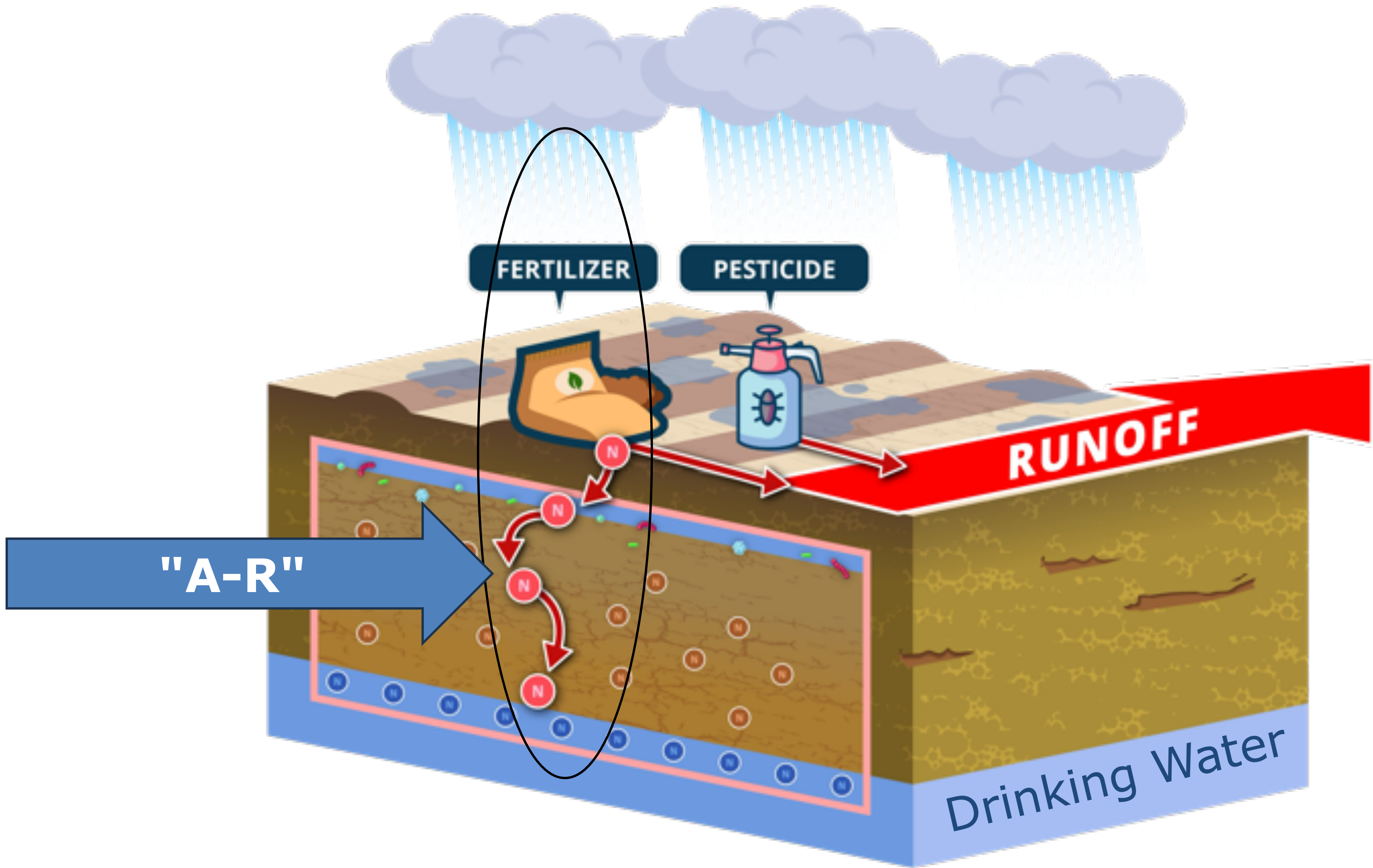
# What is Ag Order 4.0 and the Irrigated Lands Regulatory Program (ILRP)?

Help me gauge the group's familiarity





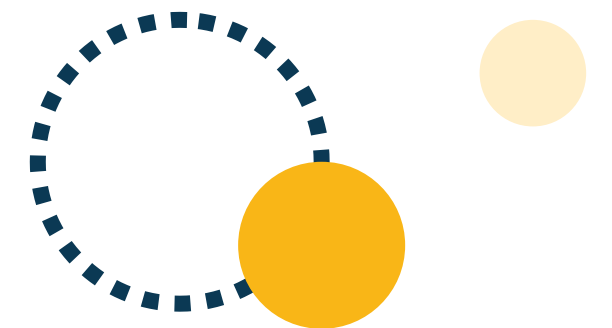




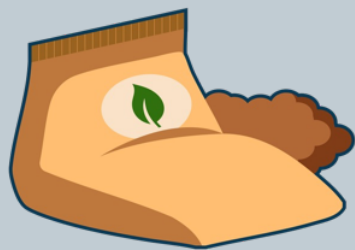


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# What is the regulatory framework?



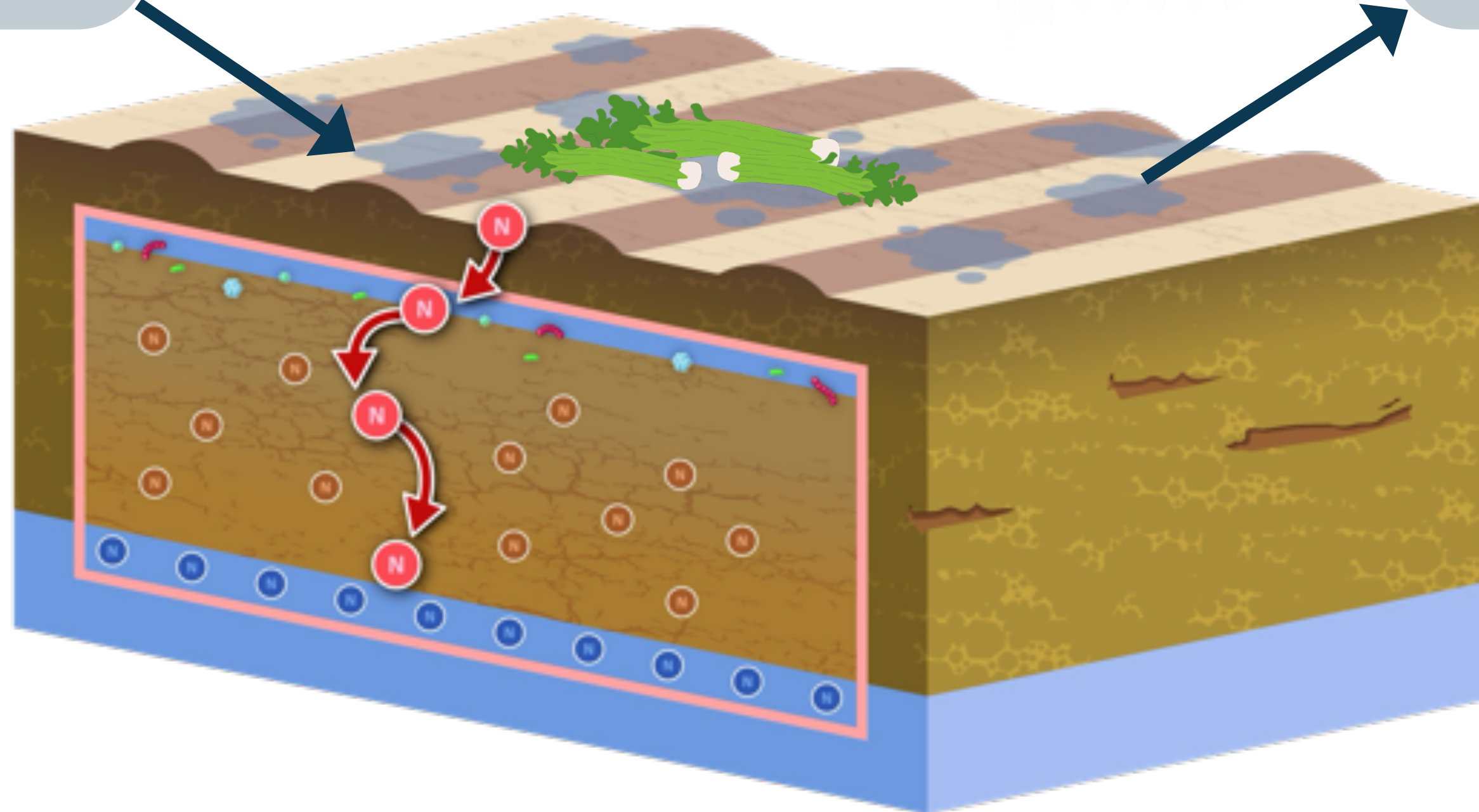
APPLIED



REMOVED



Applied (A) - Removed (R) = Discharge (leaching to GW)



# Key Ground Water Elements

## Of Ag Order 4.0



01

Required ALL farmers report Applied (A) nitrogen and Removed (R) nitrogen

Disproportional impacts to small growers

02

First policy to regulate the *Application* of nitrogen, in addition to *discharge*

Set strict limits and targets ratcheting down to 50lbs/acre in 2051, with enforcement as far as a cease and desist

03

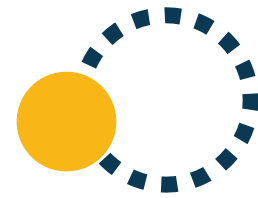
Incentivized good management practices

By adding practices like cover crops to the "R" side of the equation, and discounting the "A" side of the equation with compost and organic fertilizers

2023



# What happened to Ag Order 4.0?



Remanded by the SWB, following an Ag Petition

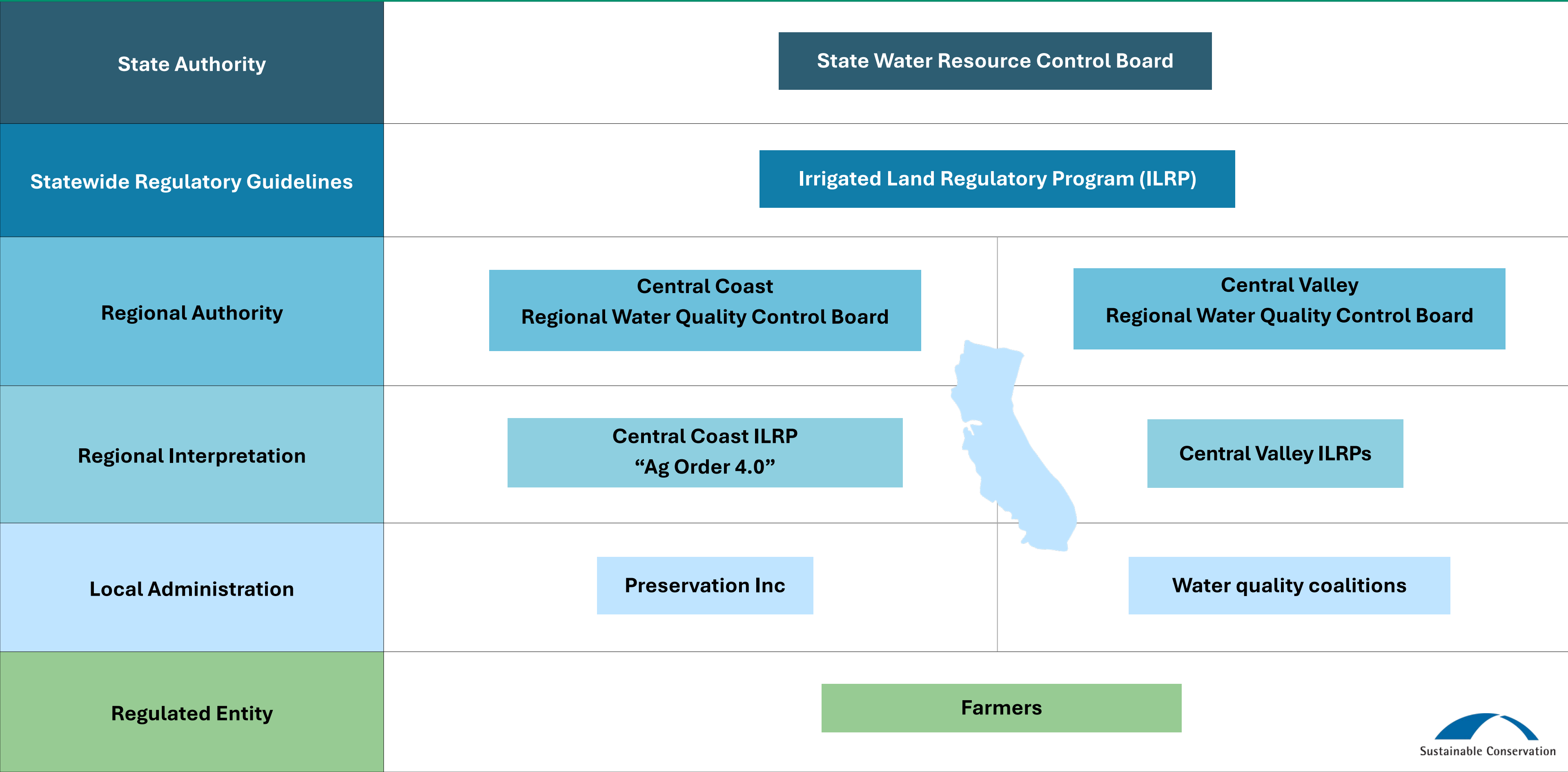
- Continue (and expand) the surface water program
- Stop Groundwater enforcement
  - Questioned the science, structure, and authority of RWBs
  - Limits and Targets
  - A-R structure, discount factors like R\_ Scavenged



Ordered a second Statewide Expert Panel

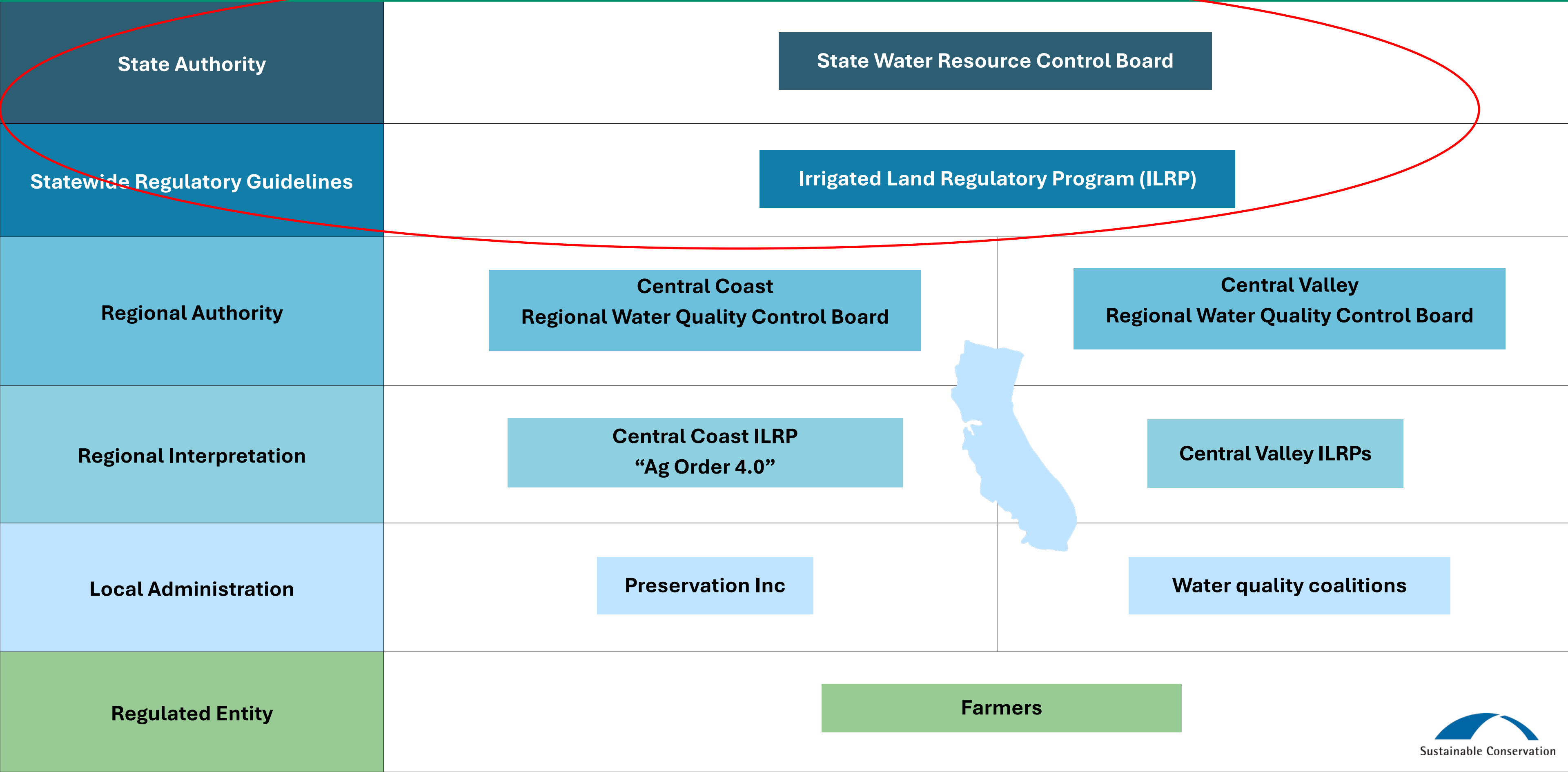
# OVERVIEW OF WATER QUALITY REGULATIONS

Graphic created by Sustainable Conservation, NOT a product of the State Water Resource Control Board.



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# How Expert Panels work

Below is the process at the state level, *all with multiple stakeholder and public engagement*

01



## SWB takes up petition

Examples of Remands:  
2017 East San Joaquin (ESJ)  
2023 Central Coast Ag Order

02



## Expert panel provides recommendations

The SWB tasks a team of scientists to answer a set of questions

03



## SWB staff provides recommendations the Board

SWB staff compiles the recs of the EP to be adopted by the Board

04



## New Statewide Precedent

In 2018, the SWB adopted a new precedent, that was the framework for original Ag Order 4.0.

The slide features decorative elements consisting of several overlapping circles in shades of yellow and dark blue. In the top-left corner, there is a large yellow circle and a smaller dark blue circle. In the bottom-right corner, there is a large dark blue circle, a medium yellow circle, and a large yellow circle with a rounded bottom edge.

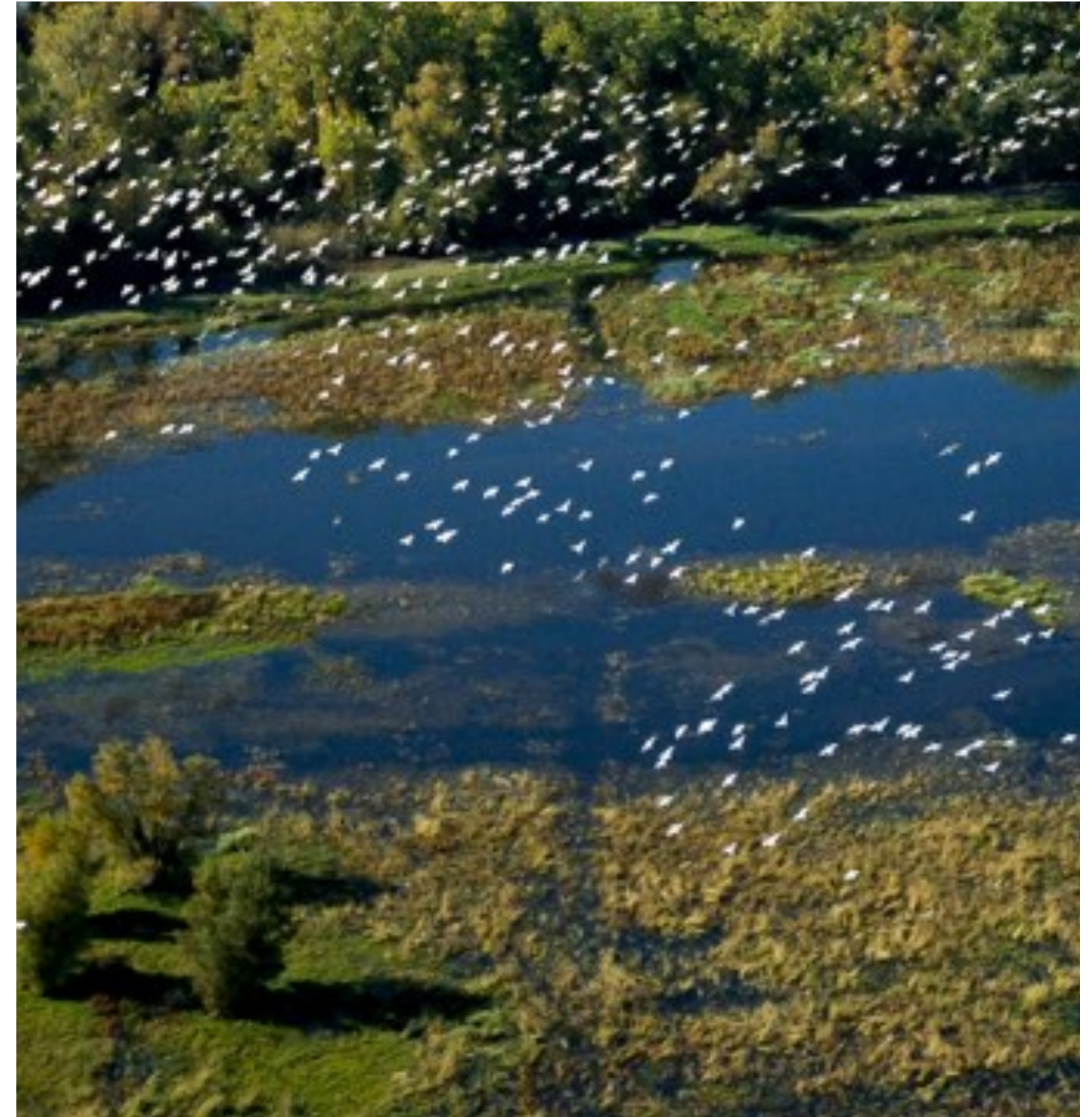
# Will we see a new precedent?

What will the SWB do?

# Recommendations from the EP

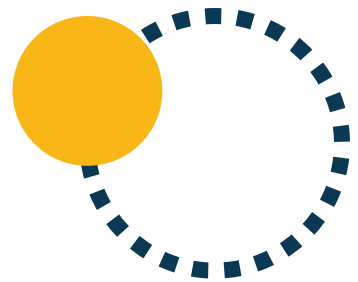
From the current draft report:

- Regional design
- Support for Ag Order 4.0's approach to A and R
- Justification for enforceable limits to A-R
- Exceptions and exemptions
  - Small, and diversified farmer considerations
- Importance of practices for meeting WQ objectives
  - Expansion of incentive structures
  - Other cover cropping strategies

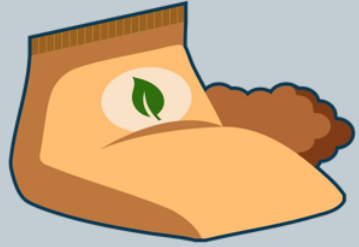


# How can practices impact A-R?

"R\_Scavenged" Cereal Cover Crops



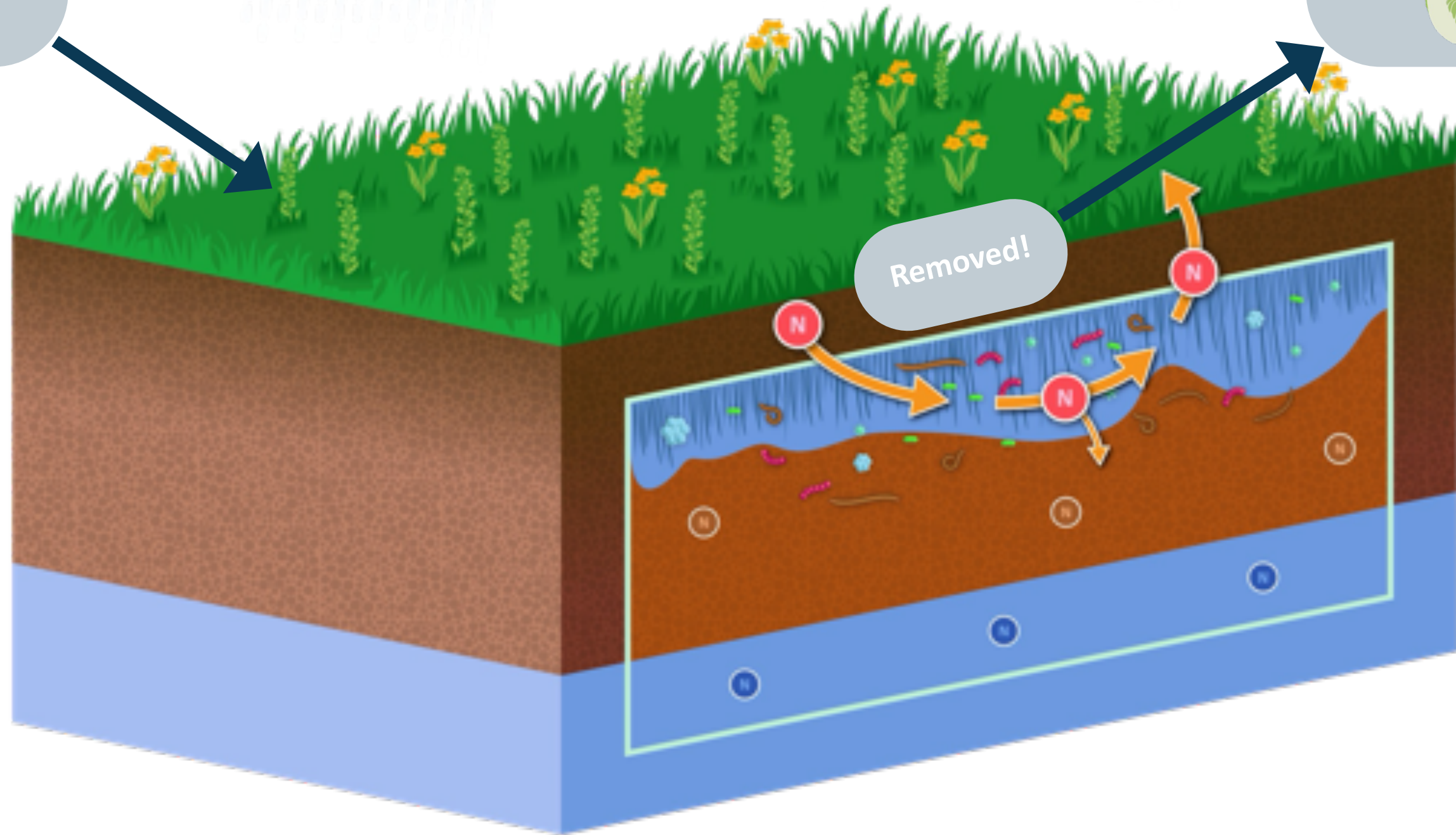
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# "R\_Scavenged" High Carbon Amendments





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# FUTURE ENGAGEMENT OPPORTUNITIES

*Comments Letters to SWB Due April 30th*

+

*More TBD*



Elliot Grant, Senior Project Manager  
Sustainable Conservation



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# QUESTIONS?

Feel free to reach me at:

[Egrant@suscon.org](mailto:Egrant@suscon.org)

