

**STATE OF CALIFORNIA  
REGIONAL WATER QUALITY CONTROL BOARD  
CENTRAL COAST REGION**

**STAFF REPORT FOR REGULAR MEETING OF DECEMBER 11-12, 2025**

Prepared on November 18, 2025

**ITEM NUMBER:** 7

**SUBJECT:** Annual Agricultural Order Implementation Update

**STAFF CONTACTS:** Elaine Sahl, 805/542-4645,  
[Elaine.Sahl@waterboards.ca.gov](mailto:Elaine.Sahl@waterboards.ca.gov),  
Paula Richter, 805/549-3865,  
[Paula.Richter@waterboards.ca.gov](mailto:Paula.Richter@waterboards.ca.gov), and  
James Bishop, 805/542-4628,  
[James.Bishop@waterboards.ca.gov](mailto:James.Bishop@waterboards.ca.gov)

**ACTION:** Informational Item

**SUMMARY**

This staff report summarizes actions related to the implementation of General Waste Discharge Requirements for Discharges from Irrigated Lands, Order R3-2021-0040<sup>1</sup> (Ag Order) that have occurred since the December 2024 annual update to the California Regional Water Quality Control Board, Central Coast Region (Central Coast Water Board).<sup>2</sup> This Agenda Item will include presentations on Ag Order implementation from Irrigated Lands Program (ILP) staff and from the approved third-party program, Central Coast Water Quality Preservation, Inc. (Preservation, Inc.). This annual Ag Order implementation update will provide an overview of the following:

1. Revisions to the Ag Order and Monitoring and Reporting Program (MRP), consistent with State Water Resources Control Board (State Water Board) Order WQ 2023-0081 (Remand Order),<sup>3</sup>
2. Alternative water supply program development,
3. Third-party program engagement and coordination efforts,
4. Ag Order compliance and enforcement, and
5. GeoTracker accomplishments.

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<sup>1</sup> Ag Order documents (Ag Order and attachments: Findings, MRP, and Definitions):  
[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/regulatory\\_information.html](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/regulatory_information.html)

<sup>2</sup> December 2024 annual update staff report:  
[https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2024/dec/item08\\_stfrpt.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2024/dec/item08_stfrpt.pdf) and  
Supplemental Sheet:  
[https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2024/dec/item08\\_sup.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2024/dec/item08_sup.pdf)

<sup>3</sup> Remand Order:  
[https://www.waterboards.ca.gov/public\\_notices/petitions/water\\_quality/docs/2023/wqo2023-0081.pdf](https://www.waterboards.ca.gov/public_notices/petitions/water_quality/docs/2023/wqo2023-0081.pdf)

This summary is also available in Spanish. Interested persons may also request that the entire staff report be translated into Spanish (see instructions in the “Language Services” section of the Agenda).

## **DISCUSSION**

### **Background**

On April 15, 2021, the Central Coast Water Board adopted the Ag Order, and it went into effect immediately. The Ag Order required continued compliance with various foundational requirements of the prior Ag Order and established new requirements, phased in over time to give enrolled dischargers (referred to as growers in this staff report) and technical assistance providers time to plan and comply. The requirements were developed to protect surface water and groundwater quality and designated beneficial uses (including drinking water and aquatic life habitats) and to achieve water quality objectives found in the Water Quality Control Plan for the Central Coastal Basin (Basin Plan) by:

- Minimizing nitrate discharges to groundwater
- Minimizing nutrient discharges to surface water
- Minimizing toxicity in surface water from pesticide discharges
- Protecting riparian and wetland habitat
- Minimizing sediment discharges to surface water

On September 20, 2023, the State Water Board remanded portions of the Ag Order to the Central Coast Water Board to revise, including the following:

- Develop findings on potential impacts of the Ag Order requirements to underrepresented communities consistent with California Water Code section 13149.2.
- Develop an alternative water supply (AWS) program for Central Coast residents relying on groundwater in areas where nitrate exceeds the maximum contaminant level (MCL) (10 mg/L as N) as a result of agricultural operations.
- Restrict the use of nitrogen application targets so that they only apply to growers that are not yet required to report nitrogen removed.
- Make other revisions to be consistent with the precedential requirements in Order WQ-2018-0002 (Eastern San Joaquin or ESJ Order), including:
  - Remove enforceable nitrogen discharge limits and limit the consequences of exceeding non-enforceable targets to additional education and Irrigation and Nutrient Management Plan certification by a qualified professional.
  - Remove certain consequences for exceeding targets and [formerly] limits.
  - Revise the A-R formula [i.e., nitrogen applied (A) – nitrogen removed (R)].
  - Define an outlier approach.
  - Remove discounts and credits from the A-R calculation formula.
  - Accelerate the timing for R reporting so that all growers report R.

In the Remand Order, the State Water Board also directed their staff to review available A and R data collected by the regional water boards and determine if there is sufficient data to convene an expert panel to advise on developing regulatory limits, among other things. On August 8, 2025, the State Water Board held the first meeting of the Second Statewide Agricultural Expert Panel.<sup>4</sup> Central Coast Water Board staff are participating in the Expert Panel meetings and have presented current data and implementation of the Ag Order at two meetings (August 14 and October 31). Additional meetings are scheduled through early 2026 and the draft recommendations of this Expert Panel are expected in 2026.

The following sections of this staff report provide an overview of ILP staff actions over the past year, including revising the Ag Order and MRP, developing an AWS program, and coordinating and implementing the Ag Order. Detailed ILP priorities are identified in the 2025/2026 Central Coast Regional Water Quality Control Board Strategic Plan.<sup>5</sup>

### **Revisions to the Ag Order**

Immediately following the issuance of the Remand Order, Central Coast Water Board staff implemented State Water Board direction to cease enforcement of the fertilizer nitrogen application and nitrogen discharge groundwater protection limits and to notify all growers enrolled in the Ag Order of this change. Pursuant to the Remand Order, the Executive Officer approved revisions to the Ag Order's MRP on October 22, 2025, including the following:

- Clarification of nitrogen reporting metrics (enforceable groundwater protection limits cannot be used; only targets apply).
- Acceleration of Irrigation and Nutrient Management Plan (INMP) Summary Reporting (one year earlier for growers in groundwater Phase 3 Areas).
- Removal of compliance discounts/credits language for compost, organic fertilizer, and cover crops (reporting is optional but not applied towards compliance determination).
- Typographical and format corrections and revisions to improve clarity.

ILP staff are also implementing other relevant remand directives in advance of the adoption of a revised Ag Order (and that do not require Central Coast Water Board approval, such as limiting the consequences of failure to meet numeric groundwater discharge targets and providing annual ranch summaries to growers that include calculations of the A over R ratio (A/R) as well as the A-R metric). Ag Order revisions will be available for public review and Board consideration once the draft AWS language is included.

The Ag Order may require additional revision following State Water Board consideration of the recommendations from the Second Statewide Agricultural Expert Panel.

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<sup>4</sup> Second Statewide Agricultural Expert Panel web page:

[https://www.waterboards.ca.gov/water\\_issues/programs/agriculture/2025-expert-panel.html](https://www.waterboards.ca.gov/water_issues/programs/agriculture/2025-expert-panel.html)

<sup>5</sup> 2025/2026 Central Coast Regional Water Quality Control Board Strategic Plan:

[https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2025/oct/Item10\\_SP.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2025/oct/Item10_SP.pdf)

## Alternative Water Supply Program Development

Staff are actively developing an AWS program by coordinating with internal and external interested parties, identifying potentially impacted wells, evaluating the cost of various solutions, and developing draft regulatory language and administrative frameworks for implementing the program. These actions have been summarized in staff presentations given at the August 2025 Central Coast Water Board meeting (AWS Public Workshop)<sup>6</sup> and in semi-annual updates to the State Water Board, in the Executive Director's Reports.<sup>7</sup> In July 2025, Central Coast Water Board staff initiated broad public outreach for the AWS program<sup>8</sup> and released two documents for public comment: *Assessment of Interim Drinking Water Needs and Costs in Central Coast Areas Affected by Agricultural Nitrate Groundwater Contamination* (Interim Need and Cost Assessment) and *Conceptual Framework for the Alternative Water Supply Program: Request for Public Input* (Conceptual Framework). The Interim Need and Cost Assessment identified areas in the Central Coast region where drinking water wells are, or may, be impacted by agricultural discharges and estimates the cost of providing interim alternative water supplies. The Conceptual Framework outlined a potential regulatory framework for the AWS Program, including Central Coast Water Board staff recommendations and feedback received from interested parties.

At the August AWS Public Workshop, Central Coast Water Board staff provided presentations on the above-mentioned documents and heard presentations and comments from agricultural representatives, environmental justice organizations, community advocates, and members of the public.

Central Coast Water Board staff continue to coordinate with interested parties including representatives of environmental justice, agricultural groups, State Water Board executive management, Office of Chief Council, and the SAFER program to discuss the development of the AWS program and relevant revisions to the Ag Order. In addition, Central Coast Water Board staff are coordinating on related efforts with the Central Coast Drinking Water Well Testing Program,<sup>9</sup> the Central Coast Regional Bottled Water Program,<sup>10</sup> and the Community-Based Water Quality Grants Program.<sup>11</sup>

Central Coast Water Board staff anticipate releasing these revised documents for public comment in the spring of 2026, in advance of a second public meeting.

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<sup>6</sup> August 2025 Central Coast Water Board agenda, see AWS Public Workshop item:

[https://www.waterboards.ca.gov/centralcoast/board\\_info/agendas/2025/aug/agenda-aug-english.pdf](https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2025/aug/agenda-aug-english.pdf)  
and August 2025 Public Workshop recordings: [https://cal-span.org/meeting/rwqcb-cc-sap\\_20250821/](https://cal-span.org/meeting/rwqcb-cc-sap_20250821/)

<sup>7</sup> State Water Board agendas web page: [https://www.waterboards.ca.gov/board\\_info/](https://www.waterboards.ca.gov/board_info/) See agendas dated April 2024, October 2024, April 2025, and October 2025.

<sup>8</sup> AWS program webpage including links to all publicly available documents:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/alternative-water.html](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/alternative-water.html)

<sup>9</sup> Central Coast Drinking Water Well Testing Program website:

<https://sites.google.com/view/ccgroundwater>

<sup>10</sup> Central Coast Regional Bottled Water Program website:

<https://sites.google.com/communitywatercenter.org/central-coast-regional-bottled/about>

<sup>11</sup> Community-Based Water Quality Grants Program website: <https://rosefdn.org/granting/environmental-grants/>

### Third-Party Program Engagement and Coordination Efforts

ILP staff and Preservation, Inc. continue to engage in standing meetings regarding third-party program implementation efforts and work plan development. Additional focused topic meetings are held as needed. Below are some key outcomes and work in progress resulting from the ILP team's coordination efforts with Preservation, Inc., since October 2024. Central Coast Water Board staff acknowledge the effort invested by Preservation, Inc. in developing work plans discussed in this section.

### Groundwater Monitoring and Reporting

- **Well Monitoring and Reporting** – ILP staff continue to coordinate with Preservation, Inc. regarding their efforts to conduct required well monitoring and reporting on behalf of growers.
- **Bay Foundation Contract** – ILP staff continue to co-manage a \$25,000 contract with the Bay Foundation of Morro Bay and Preservation, Inc. that provides funding assistance to low-income growers for on-farm domestic well sampling analysis costs. As of August 15, 2025, Preservation, Inc. assisted 24 low-income growers to analyze samples from 32 on-farm domestic wells (spending \$4,880 and therefore leaving \$13,615 of funds available for future well monitoring assistance). A no cost grant amendment is in process to extend the expiration of the grant (from 2026 to 2028).
- **Groundwater Quality Trend work plans** – Unless and until a work plan is approved by the Executive Officer for the groundwater basin where a ranch is located, growers must continue monitoring of the primary on-farm irrigation well on each ranch. Work plan approval does not change the annual requirement to monitor all on-farm domestic wells. The compliance schedule for these work plans depends on the groundwater basin location and are as follows:
  - Groundwater Phase 1 areas - due on September 1, 2023, and extended by Executive Officer approval to December 31, 2023, for the Santa Maria River Valley and to September 1, 2024, for all other Phase 1 areas.
  - Groundwater Phase 2 areas - due on September 1, 2025.
  - Groundwater Phase 3 areas - due on September 1, 2027.

To date, no work plans have been approved, however ILP staff continue to work with Preservation, Inc. regarding work plan development, submittal, review, and approval status, including the following actions from the past year:

- The Santa Maria River Valley groundwater basin Phase 1 area work plan remains the focus of coordination with Preservation, Inc. and has become the model for developing and finalizing other groundwater quality trends work plans. In November 2025, the Executive Officer provided conditional approval of the well monitoring network. Over the past year, ILP staff reviewed two versions of a revised work plan, provided feedback (including a work plan review checklist indicating which sections of the work plan were complete, partially complete, or incomplete), and participated in focused topic meetings to discuss the work plan with Preservation, Inc. and their consultants.

- On August 29, 2025, Preservation, Inc. submitted seven additional work plans for Phase 1 and Phase 2 area groundwater basins. ILP staff provided preliminary feedback, advising Preservation, Inc. the work plans did not meet all minimum criteria set forth in the MRP.<sup>12</sup> However, the Santa Maria work plan now serves as an example of the information needed to obtain conditional approval and revision of these work plans can proceed accordingly.

### **Surface Water Monitoring and Reporting**

- **Surface Receiving Water Quality Trends Monitoring and Reporting**
  - **2024 Annual Report** – due July 1 of each year. ILP staff received, reviewed, and commented on Preservation, Inc.’s 2024 annual report this summer.<sup>13</sup>
- **Surface Receiving Water Quality Trends work plan** – Due July 1, 2022. Preservation, Inc.’s Cooperative Monitoring Program has conducted surface receiving water quality trends monitoring and reporting for two decades. Under prior versions of the Ag Order, a work plan was not required. When the current Ag Order was adopted in April 2021, a requirement was added to submit a work plan (and Quality Assurance Program Plan).
  - Preservation, Inc. submitted the work plan on July 1, 2022. ILP staff reviewed the work plan, provided feedback and advised Preservation, Inc. the work plan did not meet all minimum criteria set forth in the MRP.<sup>14</sup>
  - Over the past year, ILP staff reviewed revised work plans, provided feedback and participated in focused topic meetings to discuss the work plan with Preservation, Inc. and their consultants.
  - Preservation Inc. submitted a final work plan on November 17, 2025 that is currently under review by ILP staff.
- **Follow-up Surface Receiving Water Implementation work plans** – Phased in based on watershed areas: work plans for High Priority Areas due March 1, 2024, for Medium Priority Areas is due on March 1, 2026. Preservation, Inc. has initiated early implementation and outreach efforts in High Priority Areas, in advance of work plan approval.
  - Preservation, Inc. submitted a work plan for High Priority Areas on March 5, 2024. ILP staff reviewed the work plan, provided feedback (including a work plan review checklist indicating which sections of the work plan were complete, partially complete, or incomplete), and advised Preservation, Inc. the work plan did not meet all minimum criteria set forth in the MRP.<sup>15</sup>

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<sup>12</sup> The minimum required elements for the groundwater quality trend work plans are set forth in the MRP at pages 16-17, paragraph 20 (see link to MRP in footnote 1).

<sup>13</sup> Preservation, Inc.’s annual reports website: <https://ccwqp.org/reports/>

<sup>14</sup> The minimum required elements for the surface receiving water work plan are set forth in the MRP at pages 23-24, paragraphs 6-10 (see link to MRP in footnote 1).

<sup>15</sup> The minimum required elements for the Follow-Up Surface Receiving Water Implementation work plan are set forth in the MRP at pages 26-27, paragraphs 15-19 (see link to MRP in footnote 1).

- In 2025, Preservation, Inc. submitted sections of the High Priority Areas work plan. ILP staff reviewed, provided feedback, and participated in focused topic meetings to discuss these sections with Preservation, Inc. and their consultants.
- Preservation Inc. submitted a revised work plan on October 28, 2025 that is currently under review by ILP staff.

### **Multiple Discharger Complaints**

As reported last year, the ILP received five complaints in late 2023 and early 2024 from counties alleging ongoing sediment-laden discharges in three lower Salinas River watersheds, the Galligan Slough watershed, and the Pacific Coast Nearshore Zone at Soquel Point that involved multiple dischargers. ILP staff and Preservation, Inc. continue to coordinate on these complaint cases to develop a watershed-based approach to resolving sediment discharges in these watersheds. Actions from the past year include the following:

- Preservation, Inc. conducted ranch site visits for the majority of the ranches, including on-site training on self-assessment of the effectiveness of implemented management measures.
- Preservation, Inc. reviewed growers submitted Sediment and Erosion Management Plans (SEMPs) for the majority of the ranches and provided feedback to growers.
- Preservation, Inc. issued past due reminders to operations with ranches that did not submit SEMPs in June 2025. If the SEMP is not submitted, Preservation, Inc. intends to issue a letter advising the operator they are no longer eligible for third-party program membership.
- Additional ILP and Preservation, Inc. coordination included.
  - Issuing past due and final reminders to submit SEMPs in December 2024.
  - Issuing Water Code section 13267 letters requiring submission of SEMPs directly to the Central Coast Water Board in May 2025. The SEMPs were submitted, reviewed, and the cases turned back over to Preservation, Inc. for follow-up actions (e.g., ranch site visits).
  - Focused topic meetings (in January and July 2025) to discuss current case status and planned outreach efforts in each complaint case area.

The goal is to use one case as a model for outreach efforts which are anticipated to include a coordination meeting(s) with county representatives, RCD staff, growers, landowners, ILP staff, and Preservation, Inc. regarding potential watershed-based solutions to the sediment and erosion issues in the complaint case area.

### **Outreach and Education**

ILP staff collaborated with Preservation, Inc. on outreach and education efforts to assist growers with compliance including general grower support, workshops, guidance and instruction documents, tutorial videos, etc. ILP staff will participate in four grower workshop events coordinated by Preservation, Inc. and scheduled between November



and December 2025. ILP staff are coordinating an additional four grower workshops between January and February 2026 where Preservation, Inc. will participate. The goal of the workshops is to assist growers with enrollment, GeoTracker access, Annual Compliance Forms (ACF), TNA and INMP reporting.

### **Ag Order Enrollment, Compliance, and Enforcement**

The ILP implements a progressive enforcement approach that contemplates an escalating series of actions beginning with compliance assistance, requirement due date reminders, and notices of violation (NOVs), followed by enforcement orders compelling compliance, and in certain instances, a complaint for administrative civil liabilities where compliance is not attained within a reasonable time. ILP staff coordinate with the Enforcement Team to prioritize follow-up actions and progressive enforcement to effectively balance enforcement efforts with other fundamental implementation-related activities (e.g., outreach, general compliance assistance, coordination with technical assistance providers) with the goal of achieving higher levels of compliance and meaningful water quality outcomes.

The following sections describe efforts to enroll ranches (non-filers), compliance evaluations, NOV's issued, and enforcement cases pursued over the past year. For information on all

Ag Order requirements and their due dates, please refer to the Compliance Calendar located on the ILP website.<sup>16</sup>

- **Enrollment and Non-Filer Efforts** - The ILP currently estimates there are approximately 474,700 acres of commercial irrigated agricultural lands in the region.<sup>17</sup> As of October 2025, 1,637 operations, 3,898 ranches, and 403,943 irrigated acres (~85% of the estimated commercial irrigated agricultural lands in the region) are actively enrolled in the Ag Order. Since October 2024, ILP staff issued 68 directive to enroll (DTE) letters to landowners of 74 parcels pursuant to Water Code section 13260. As a result, 33 parcels have either been enrolled in the Ag Order or landowners provided information demonstrating the parcels are not required to be enrolled (e.g., the parcel is not used for commercial irrigated agricultural operations). On May 1, 2025, 15 NOVs (31 parcels) were issued. Ten landowners (29 parcels) resolved the NOVs.
- **Reminders** – ILP staff continue to issue Semi-Annual Ranch Summary Reports in the spring and fall. These reports alert growers to their status with respect to each Ag Order requirement and what type of action is needed from them to address any deficiencies. ILP staff have observed that these reminders help to improve overall understanding of and compliance with Ag Order requirements.
- **Notices of Violation** –Throughout the year, ILP staff conduct compliance analyses and issue NOVs to growers that have not met specific Ag Order

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<sup>16</sup> ILP Compliance Calendar:

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/ilp/compliance\\_calendar/](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/compliance_calendar/)

<sup>17</sup> A previous analysis conducted over five years ago estimated there were approximately 540,000 acres of commercial irrigated agricultural lands in the region. In 2025, ILP staff conducted a reassessment of commercial irrigated agricultural lands in the region using updated mapping layers and tools.



requirements. Table 1 provides a summary of monitoring and reporting requirements due, and a summary of NOVs issued, since October 2024.

**Table 1. Reporting Compliance and NOVs Issued Since October 2024**

Requirements	Complied	NOVs Issued
ACF (January – December 2024) - Report due: 03/01/2025	2,905 ranches 73%	None <sup>a</sup>
TNA (January – December 2024) - Report due: 03/01/2025	3,233 ranches 88%	437 ranches <sup>b</sup>
INMP (January – December 2024) Report due: 03/01/2024	338 ranches 95%	19 ranches <sup>b</sup>
Well Sampling - Monitoring: 03/01/2025 to 05/31/2025 - Results due: 07/31/2025	3,056 ranches 96%	TBD ranches <sup>c</sup>
Work Plans	None <sup>d</sup>	TBD

<sup>a</sup> A revised ACF was made available in GeoTracker on May 1, after the due date.

<sup>b</sup> ILP staff continue to follow-up with growers and anticipate this compliance rate will increase as a result of NOV issuance.

<sup>c</sup> ILP staff continue to work with Preservation, Inc. to provide more time for research and follow-up with growers prior to the issuance of NOVs, planned for early December 2025.

<sup>d</sup> Compliance analysis and NOV issuance is planned for early 2026. Please refer to third party section above for additional detail on the status of third-party work plan submittals, approvals, and ongoing monitoring and reporting occurring in advance of work plan approval. Former third-party members that lost membership eligibility in 2025 are now required to submit work plans individually.

## Enforcement Actions

When growers fail to comply with Ag Order requirements, following NOVs, follow-up communications, and other attempts to contact the responsible parties, ILP staff develop recommendations and coordinate with the Enforcement Team to offer the opportunity to enter into settlement negotiations to resolve violations. In the absence of a settlement agreement, the Enforcement Team may issue administrative civil liability (ACL) complaints to seek monetary penalties for violations. The Enforcement Team frequently reaches resolution of ACL complaints through settlement.

- **Enforcement of Directives to Enroll** – This year, the enforcement team followed up on NOVs issued in 2024 for failure to enroll and engaged in a project to research, attempt to resolve, and if needed, issue ACLs for failure to submit a report of waste discharge (i.e., enroll in the Ag Order). ILP staff also issued courtesy letters to pesticide use permit holders notifying them that according to Agricultural Commissioner records they may be actively farming on the parcel and required to enroll in the Ag Order.<sup>18</sup> On June 12, 2025, the Enforcement Team issued eight settlement offers to landowners of 18 parcels.<sup>19</sup> Five cases

<sup>18</sup> One of the lessons learned from this effort was that courtesy letters issued to pesticide use permit holders resulted in immediate enrollment in the Ag Order and resolution of 50% of potential ACL cases. Moving forward, the ILP will issue DTE letters to both landowners and pesticide use permit holders.

<sup>19</sup> Settlement meetings were conducted with three landowners in June and July of 2025.

were resolved, two cases settled, and one case is pending further settlement discussions with the landowner.

### Complaint Investigations

- **Complaints** – In addition to the multiple discharger complaints discussed in the Third-Party Program Engagement and Coordination Efforts section, the ILP currently has 11 active complaint cases, four of which were submitted after October 2024 (new cases). In the past year, the ILP received complaints from growers, citizens and municipalities. Geographically, 45% of the complaints were in Santa Barbara County and 35% were in Monterey County (San Luis Obispo and Santa Cruz counties each accounted for 9% of the complaints). Silt and sediment discharges represented the majority (60%) of complaint case allegations, followed by 30% related to riparian area disturbance, and 20% related to irrigation and fill discharges.
- **Case Resolution** – Seven complaint cases were resolved between October 2024 and October 2025, including cases reported in previous years. None were elevated to formal enforcement action. The average complaint resolution time was 46 days, with a maximum of 166 days, and a minimum of one day.

### GeoTracker Accomplishments

In addition to coordinating with Preservation, Inc. on GeoTracker uploads, the ILP coordinates with the State Water Board's GeoTracker team to develop and/or revise ILP GeoTracker forms (e.g., ACF, TNA, INMP), reports, data exports, batch data uploads, and other GeoTracker functionality. These improvements increase staff's ability to track compliance and have resulted in improved quality and completeness of grower reported data. Below is a summary of major efforts and accomplishments this year.

- **ACF** – On May 30, 2025, the revised ACF was made available as a read-only version in GeoTracker to allow for ILP outreach with growers prior to 2025 reporting (due by March 1, 2026). The revisions include new sections to report on management measure effectiveness assessments, improve data collection, data exports, and the user experience with the form.
- **Housekeeping** – A request was submitted on May 11, 2022 to develop or improve upon GeoTracker reports, data exports, and other GeoTracker functionality. When implemented, these changes will increase ILP staff efficiency and enhance the user experience with GeoTracker.

### Human Right to Water

California Water Code section 106.3, subdivision (a) states that it is the policy of the State of California "that every human being has the right to safe, clean, affordable, and accessible water adequate for human consumption, cooking, and sanitation purposes." Consistent with State legislation, on February 16, 2016, the State Water Board adopted Resolution No. 2016-00101, which identifies the human right to water as a core value and directs its implementation in State Water Board programs and activities.<sup>30</sup>

On January 26, 2017, the Central Coast Water Board adopted Resolution R3-2017-0004, which affirms the realization of the human right to water and the protection of human health as the Central Coast Water Board's top priorities. The resolution directs

staff to prioritize regulatory programs to prevent and address discharges that threaten human health by causing or contributing to pollution or contamination of drinking water sources; and to promote achievement of the human right to water through effective prioritization, implementation, outreach and participation, performance monitoring and reporting, and through building strategic partnership.

The Ag Order implements the Central Coast Water Board's human right to water law in several ways. Staff are actively working on the development of an alternative water supply program to provide safe drinking water to residents and communities impacted by nitrate from agriculture in groundwater. Please also refer to the August 2025 Board meeting and Public Workshop on the Development of an Alternative Water Supply Program.

The Ag Order establishes numeric targets for fertilizer application and nitrogen discharge to groundwater designed to be quantifiable and to reduce the amount of nitrogen discharging to groundwater. Based on TNA data evaluation, a high percentage of fertilizer nitrogen applications already meet both fertilizer nitrogen application targets, confirming that the adopted fertilizer nitrogen targets are consistent with their intended purpose: to control and reduce the over-application of fertilizer nitrogen and to focus on outliers where applications occur above fertilizer nitrogen application targets.

The Ag Order also implements the Central Coast Water Board's human right to water resolution by establishing numeric surface receiving water limits for nutrients and pesticides, and a series of requirements to further identify and control the discharge of these pollutants. The surface water follow-up monitoring requirements include identifying implementation measures to address the pollutant sources and perform additional follow-up monitoring for source identification purposes. Also, where the surface receiving water limit is not met by the compliance date, growers are subject to a ranch specific numeric discharge limit that is the same as the receiving water limit and may be required to perform additional ranch-level surface discharge monitoring and reporting to confirm they are achieving the ranch specific numeric discharge limit.

The Ag Order also requires monitoring of all on-farm domestic wells for nitrate and 1,2,3-Trichloropropane (1,2,3-TCP) and requires growers to notify all well users of monitoring results and of the health risks associated with elevated concentrations of these parameters. In the event nitrate or 1,2,3-TCP concentrations exceed applicable public health drinking water standards, growers also need to confirm that well users have an alternative source of water for domestic purposes. By requiring the notification of the sampling results and confirming there is an alternative water supply for the well users, the Ag Order implements and expands the Human Right to Water resolution.

### **Environmental Justice**

Environmental Justice principles call for the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income in the development, adoption, implementation, and enforcement of all environmental laws, regulations, and policies that affect every community's natural resources and the places people live, work, play, and learn. The Central Coast Water Board implements regulatory activities and water quality projects in a manner that ensures the fair treatment of all people, including Underrepresented Communities. Underrepresented Communities include but

are not limited to Disadvantaged Communities (DACs). Severely Disadvantaged Communities (SDACs), Economically Distressed Areas (EDAs), Tribes, Environmentally Disadvantaged Communities (EnvDACs), and members of Fringe Communities.

Furthermore, the Central Coast Water Board is committed to providing all interested parties with the opportunity to participate in the public process and provide meaningful input to decisions that affect their communities. On February 16, 2023, the Central Coast Water Board adopted the Racial Equity Resolution R3-2023-0002, which condemns racism, xenophobia, bigotry, and racial injustice and strengthens our commitment to racial equity, diversity, inclusion, access, and anti-racism in the central coast region.

In the past 12 months of Ag Order implementation, ILP staff continued to support efforts previously initiated and related to drinking water replacement and water treatment for disadvantaged communities. Please also refer to the February 2025 annual Board update on Environmental Justice, Racial Equity, and Tribal Affairs.

The Central Coast Water Board recognizes that certain limited resource growers (as defined by the USDA) may have difficulty achieving compliance with the Ag Order. The Central Coast Water Board will prioritize assistance for these growers, including but not limited to providing technical assistance and information about grant opportunities. ILP staff continue to increase our interpretation and translation efforts to provide information and resources in multiple languages (e.g., guidance documents, YouTube tutorials, drinking water health risk information, and our public workshops and Board Meetings).

### **Climate Change**

As discussed at the December 2018 Board Meeting, the Central Coast faces the threat and the effects of climate change for the foreseeable and distant future. To proactively prepare and respond, the Central Coast Water Board has launched the Central Coast Water Board's Climate Action Initiative, to identify how the Central Coast Water Board's work relates to climate change and prioritizes actions that improve water supply resiliency through water conservation and wastewater reuse and recycling; mitigate for and adapt to sea level rise and increased flooding; improve energy efficiency; and reduce greenhouse gas production. The Climate Action Initiative is consistent with the Governor's Executive Order B-30-15 and the State Water Board's Comprehensive Response Climate Change Resolution No. 2017-0012.

The Ag Order contains several requirements that further the Central Coast Water Board's climate change goals. The management measures that growers will implement to meet the Ag Order's fertilizer application and nitrogen discharge targets may have the added benefit of reduced nitrogen oxide emissions and therefore may help mitigate greenhouse gas emissions. In addition, and consistent with the state's Healthy Soils Initiative AB 406, the Ag Order encourages the use of compost, organic fertilizers and amendments, and planting cover crops, to improve soil health, nutrient and carbon sequestration, and water holding capacity. Carbon sequestration has a direct impact on climate change by reducing the carbon in the atmosphere.

## CONCLUSION

The Ag Order focuses on the highest priority water quality issues in the region and establishes requirements to address water quality impairments and restore water quality for the designated beneficial uses such as drinking water and aquatic life habitats. In the past year of implementation, ILP staff finalized revisions to the MRP, advanced development of the AWS Program, and coordinated with Preservation, Inc. on groundwater and surface water monitoring and reporting, outreach and other implementation priorities. Staff also evaluated compliance with requirements, developed web-based user-friendly dashboards, followed internal progressive enforcement processes to provide a series of reminders before moving to NOVs and formal enforcement actions, and negotiated settlements for enforcement cases. Additionally, ILP staff provided one-on-one assistance to over 1,000 growers, hosted multilingual workshops with Preservation, Inc., and developed instructional materials in English, Spanish, and Chinese to support compliance and environmental justice.

ILP staff will continue to conduct outreach and education, provide real-time compliance assistance to growers, and to coordinate and prioritize implementation efforts with Preservation, Inc. and other technical assistance providers and agencies (like USDA, Resource Conservation Districts, CDFA, DPR, etc.) to leverage their expertise in support of implementing the Ag Order.

ILP staff are currently in the process of revising the Ag Order to address the remanded items in the State Water Board Order WQ 2023-0081. Until a revised Ag Order is adopted, staff will continue to implement the provisions of the current Ag Order, including the newly revised MRP, while also implementing timely State Water Board remands, as appropriate. Staff will continue coordinating with agricultural and environmental justice groups to advance the AWS program for residents relying on groundwater where the MCL for nitrate is exceeded because of agricultural activities.