
North Coast Regional Water Quality Control Board

Regional Water Quality Control Board North Coast Region

Staff Summary Report August 6, 2026

ITEM: 5

SUBJECT: Public Hearing to Consider Adoption of Proposed Order No. R1-2026-0035, General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain, and Proposed Resolution No. R1-2026-0036, Certification of Environmental Impact Report, California Environmental Quality Act Findings of Fact, and Statement of Overriding Considerations. (David Kuszmar, Chris Watt, Brenna Sullivan, Ben Zabinsky)

BOARD ACTION: The North Coast Regional Water Quality Control Board (North Coast Water Board) will consider adopting proposed Order No. R1-2026-0035 (Proposed Lily Bulb Order) and proposed Resolution No. R1-2026-0036 (Certification of EIR).

BACKGROUND:

The Smith River Plain is a coastal plain located at the lower end of the Smith River watershed near the mouth of the mainstem Smith River. The drainage network of the Smith River Plain is comprised of several small coastal tributaries and the Smith River estuary, which provides high quality habitat for salmonids and other aquatic and riparian species, and which holds deep cultural and subsistence significance for the Tolowa Dee-ni' Nation. Commercial lily bulbs are cultivated in the Smith River Plain on a 3-5 year rotation with pasture and hay production on an area of roughly 1,000 acres. Accounting for this crop rotation, about 160 acres are planted to lilies each year, with another 160 acres in a given year being prepared to receive the following year's plantings.

Cultivation of lily bulbs involves soil disturbance and agricultural chemical use that can generate discharges of sediment, nutrients, and pesticides to surface waters and pesticides and nutrients to groundwater. Without effective implementation of management practices, these discharges have the potential to degrade water quality,

contribute to pollution or nuisance¹ conditions, and/or impair beneficial uses of state waters.

The North Coast Water Board regulates nonpoint sources of pollution, including agriculture, pursuant to the State Porter-Cologne Water Quality Control Act. The Proposed Lily Bulb Order is consistent with the precedential elements of State Water Resources Control Board Order WQ 2018-0002 (Eastern San Joaquin Agricultural Order) and implements applicable policies, including the State Water Board's Policy for Implementation and Enforcement of the Nonpoint Source Pollution Control Program (NPS Policy) and the State Antidegradation Policy.

The North Coast Water Board's efforts to address impacts of lily bulb agricultural discharges began in 2011. Following SWAMP monitoring conducted in 2013–2015 (issued as the 2018 SWAMP Report) that documented pesticide concentrations exceeding U.S. EPA aquatic life benchmarks, the North Coast Water Board partnered with lily bulb growers, the Tolowa Dee-ni' Nation, the Del Norte Resource Conservation District, NOAA Fisheries, CDFW, the California Department of Pesticide Regulation (CDPR), and other partners to develop the Smith River Plain Water Quality Management Plan (2021 Management Plan) in November 2021. Under the 2021 Management Plan, growers voluntarily implement management practices and the North Coast Water Board conducts site inspections and surface water monitoring. A follow-up SWAMP Report covering the 2021–2024 monitoring period was issued in September 2025.

Development of the Lily Bulb Order was initiated in 2023 with the formation of a Technical Advisory Group. On October 10, 2024, the North Coast Water Board published a Notice of Preparation of an Environmental Impact Report and initiated a 30-day CEQA Scoping public comment period. On January 30, 2026, the Draft Lily Bulb Order, Draft Environmental Impact Report (Draft EIR), and a Notice of Availability were released for a 45-day public review and comment period. On February 18, 2026, the North Coast Water Board held a Public Workshop on the Draft Lily Bulb Order and Draft EIR in Crescent City, Del Norte County, at which the Board directed staff to extend the public comment period to 60 days. The extended public comment period closed on March 30, 2026.

Additional background, including community engagement and recent groundwater and surface water quality monitoring results, is available in the Staff Summary Reports for

¹ as defined in Water Code §13050

the North Coast Water Board's [February 18, 2026 meeting](#) and from the [October 8, 2025 meeting](#), both in Crescent City.

DISCUSSION:

Proposed Order No. R1-2026-0035, General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain would establish General Waste Discharge Requirements (GWDRs) that are consistent with the State Water Board's Irrigated Lands Regulatory Program and would include: (1) enrollment and payment of fees; (2) implementation and adaptation of management practices; and (3) monitoring and reporting. The Proposed Lily Bulb Order would cover all commercial lily bulb farming operations in the Smith River Plain Hydrologic Subarea and the coastal terrace between Pyramid Point and the Oregon border.

The Proposed Lily Bulb Order would require Enrollees to implement management practices to control agricultural discharges in their fields in rotation for lily bulb cultivation, Appurtenant Agricultural Roads, and Streamside Areas. Through a Monitoring and Reporting Program, Enrollees would sample surface waters for pesticides and groundwater for pesticides and nitrates. When sampling results document exceedances of Water Quality Benchmarks for constituents of concern, Enrollees would be required to implement improved management practices on a time schedule to meet Receiving Water Limitations. As is consistent with the Irrigated Lands Regulatory Program, Enrollees may enroll individually or through an approved Coalition, which manages fees and may conduct monitoring and reporting on behalf of Enrollees.

Following the close of the public comment period on March 30, 2026, staff considered comments received and developed revisions to the Draft Lily Bulb Order and Draft EIR. All written comments, staff's responses, and a complete summary of revisions to the Draft Lily Bulb Order can be found in FEIR Attachment B: Responses to Comments and Summary of Revisions. Key categories of revision in the Proposed Lily Bulb Order include the following:

- **Streamside Area Requirements.** Expanded the annual time window for the vegetated ground cover requirement to better align with the storm season and support pollutant filtering and bank stabilization consistent with the Temperature Implementation Policy.
- **Surface Water Monitoring Program.** Refined the monitoring schedule and station network to focus sampling on the time periods, locations, and constituents most likely to reflect discharges from lily bulb cultivation, and updated Surface Water Quality Benchmarks to address the Estuarine Habitat Beneficial Use.

- **Surface Water Adaptive Management.** Refined the Adaptive Management Program to more precisely target the fields and application activities most likely responsible for a detected Water Quality Benchmark exceedance, improving the link between monitoring results and corrective action.
- **Groundwater Monitoring Program.** Consolidated the Groundwater Trend Monitoring and Drinking Water Supply Well Monitoring requirements into a single program with shared parameters and methods to remove redundancy, and adjusted sampling frequencies so that monitoring effort scales to observed water quality conditions.
- **Groundwater Adaptive Management.** Replaced the aggregate, statewide-precedent-scaled framework with individual, water-quality-based triggers and reporting appropriate to the scale of three growers and a single crop, focusing limited resources on direct actions that improve groundwater quality.
- **Reporting, Coalition, and Quality Assurance Requirements.** Scaled reporting, Coalition, and Quality Assurance requirements to a three-grower program, removing elements designed for large regional Coalitions and embedding Quality Assurance specifications directly in the Order to streamline implementation without reducing water quality protection.

PUBLIC ENGAGEMENT:

Since 2023, North Coast Water Board staff have actively engaged with growers, the Tolowa Dee-ni' Nation, agency partners, environmental organizations, and the broader Del Norte County community to inform the development of the Lily Bulb Order. Additional detail on this engagement is included in the [Staff Summary Report](#) for the February 18, 2025 public workshop. Since the workshop and prior to the release of the Proposed Lily Bulb Order staff have conducted the following outreach and engagement:

- A 60-day public comment period on the Draft Lily Bulb Order and Draft EIR (extended from 45 days), which included a hybrid Public Workshop during the February 18, 2026 meeting of the North Coast Water Board in Crescent City.
- Direct meetings with lily bulb growers to contextualize written comments and discuss intended revisions to the Draft Lily Bulb Order.
- Continued AB 52 consultation with the Tolowa Dee-ni' Nation and coordination with the Tribe's cultural and natural resources staff on intended revisions to the Draft Lily Bulb Order.
- Field tours with the lily bulb growers and CDFW staff to scope revised surface water monitoring location(s) and characterize field drainage.

- Technical consultation with CDPR through the Management Agency Agreement.

During the 60-day public comment period that closed March 30, 2026, the North Coast Water Board received approximately 180 written comment letters (41 distinct comment letters and 135 customized submissions of 2 different form letters) on the Draft Lily Bulb Order and Draft EIR. Additionally, the Board Chair admitted four late comment letters submitted by April 1, 2026. At the February 18, 2026 public workshop, members of the public provided oral comments on the Draft Lily Bulb Order and Draft EIR. All written comments on the Draft Order and Draft EIR and staff's responses are included in FEIR Attachment B: Summary of Revisions and Response to Comments. Comment letters are available upon request.

As a component of public engagement, staff developed an Enrollee Help Guide to assist growers and members of the public in understanding and implementing the requirements of the Proposed Lily Bulb Order. The Guide explains key components of the Order through visuals and plain language and is intended as a living document that can be updated as needs evolve during implementation of the Order.

FINAL ENVIRONMENTAL IMPACT REPORT:

The Final Environmental Impact Report (FEIR) found that implementation of the Proposed Lily Bulb Order has the potential for significant and unavoidable impacts to Agriculture and Forestry Resources due to Streamside Area setbacks. The FEIR estimates that up to approximately 28 acres of the Baseline Cultivation Area (approximately one percent)² and up to approximately 132 acres of the Potential Cultivation Area (less than two percent) in the Smith River Plain could potentially be converted to non-agricultural uses (e.g., riparian vegetation and vegetated buffer) due to the Streamside Area setback requirements. While Prime Farmland could be taken out of production under the Lily Bulb Order, the converted land would be allowed to revert to riparian vegetation, which is generally beneficial for water quality and the ecosystem.

No alternative was identified which would both avoid the significant and unavoidable impact to Agricultural Resources and fully achieve the stated objectives of the Project (Proposed Lily Bulb Order). However, the Project was modified to mitigate the significant impact by incorporating a Riparian Vegetation Area Restoration Alternative, under which Enrollees may avoid converting the full Streamside Area to non-agricultural use by restoring and providing long-term protection of riparian vegetation at an

² see Table V.1. in the Draft EIR:

https://www.waterboards.ca.gov/northcoast/water_issues/programs/agricultural_lands/lily/pdf/2026/Draft_EIR_GWDRs_Comm.pdf

alternative location within the same HUC-12. The Final EIR also identifies potentially significant impacts to Biological Resources, Cultural Resources, and Tribal Cultural Resources, and identifies mitigation measures that would reduce those impacts to less-than-significant levels. The adopted mitigation measures are incorporated into the Proposed Lily Bulb Order as Attachment E (CEQA Mitigation Measures) and the corresponding Mitigation Monitoring and Reporting Program.

Proposed Resolution No. R1-2026-0036 certifying the Final EIR includes CEQA Findings of Fact and a Statement of Overriding Considerations, which finds that the Project's overall benefit to the public and the environment outweighs the significant and unavoidable impact to Agriculture and Forestry Resources.

RECOMMENDATION:

Adopt Order No. R1-2026-0035 and Resolution No. R1-2026-0036, as proposed.

SUPPORTING DOCUMENTS:

- Proposed Order No. R1-2026-0035, General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain
 - Attachment A: Monitoring and Reporting Program
 - Attachment B: Management Practices
 - Attachment C: Grower Coalition Requirements
 - Attachment D: Methodologies and Procedures
 - Attachment E: CEQA Mitigation Measures
 - Attachment F: Forms and Templates
- Summary of Revisions and Response to Comments
- Proposed Resolution No. R1-2026-0036, Certification of Environmental Impact Report, California Environmental Quality Act Findings of Fact, and Statement of Overriding Considerations
- Final Environmental Impact Report for General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain
 - FEIR Attachment A: Proposed General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain
 - FEIR Attachment B: Summary of Revisions and Response to Comments
 - FEIR Attachment C: Draft Environmental Impact Report
 - FEIR Attachment D: Draft General Waste Discharge Requirements for Commercial Lily Bulb Operations in the Smith River Plain
 - FEIR Attachment E: Comment Letters (available upon request)
- Notice of Public Hearing
- Notice for Opportunity for Public Comment
- Enrollee Help Guide