



AGENDA

Dixon/Solano Resource Conservation District (RCD) Water Quality Coalition AD HOC ADVISORY COMMITTEE MEETING

**Wednesday, May 27, 2026
5:30 pm – 7:00 pm
RCD Conference Room
1170 N. Lincoln Street, Suite 109
Dixon, CA 95620**

CONTACT: Martha McKeen (707) 678-1655 x103 or (530) 867-6289

1. Water Quality (WQ) Coalition Finances and Budget Update – Martha McKeen
 - Review FY 2025/2026 projected year-end WQ budget.
 - Review FY 2026/2027 preliminary WQ budget.
 - Committee to provide recommendations on both budgets.

2. Fee Policy Review – Per irrigated acre fee cost of the program and Admin fee – Martha McKeen
 - Review the per acre fee, stay the same, decrease or increase the fees based on the water quality 2026/2027 preliminary budget.
 - Review a possible addition to an Admin fee.
 - Committee to provide recommendations of the per/acre fee cost and Admin fee.

3. Membership Policy Review – Consider reinstating policy to drop members for non-reporting
 - Review reinstating the drop member policy
 - Committee to provide recommendations of the drop member policy

4. Correspondence Policy Review – Consider a streamlined correspondence policy – Martha McKeen
 - Review possible policies change to streamline correspondence for members who pay and report past the set due dates.
 - Committee to provide recommendations of a correspondence policy for invoices.
 - Committee to provide recommendations of a correspondence policy for late reporters.



5. Tech Policy Review – Consideration to adopt a mass texting service – Martha McKeen

- Review adding new technology, mass text service for ILRP correspondence.
- Committee to provide recommendations of a mass text service for correspondence.

6. Coalition and Program Update – Enrolled acres, GSA, DMT, DWW, GWPT, AB 2447 and CV SALT – Martha McKeen and Kelly Huff

Informational only:

- Acreage update in the Dixon/Solano subwatershed
- GSA coordination update
- DMT water usage data
- Drinking Water Well sampling update
- Groundwater Protection Targets update
- AB 2447 Bill update
- CV Salts update

DIXON / SOLANO RCD WATER QUALITY COALITION

FY 2026/2027 BUDGET PLANNING

FY 2026/2027 Total Budgeted Income is \$456,206.

- Projected enrollment fees of **\$446,206** (Existing members are based on the May 2026 enrollment with approximately 120,055 enrolled acres and less the Pasture-No N credit of \$4,000)
- Projected Interest Income **\$10,000**.

FY 2026/2027 Total Budgeted Expenses are \$508,003.

- Fees & Permits cost \$184,887 reflects a projected State Fee increase of 5%, \$1.58 per irrigated acre (\$1.26 per acre for Pasture-No N). FY25/26 fees were \$1.50 and \$1.20 respectively.
- FY 2026/2027 RCD Staff cost of \$121,390 reflect adjustments to staffing and billable rates including both Dixon and Solano RCDs staff time.
- The Sacramento Valley Water Quality Coalition (SVWQC) preliminary budget figures will be in Sept-Oct.

Based on the attached budget, estimated expenses will exceed estimated revenues by **\$51,797**.

Total Income	\$456,206.25
Total Expenses	\$508,002.90
Net Position	-\$51,796.65

Projected **Beginning Funds** available are **\$236,900**
 Projected **Ending Funds** balance (cash-on-hand) will be **\$185,103**.

After subtracting the minimum fund balance reserves of \$100,000, there is a remaining balance of **\$85,103**.

FY 2026/2027 is a non-assessment year for surface water monitoring therefore, costs will be similar to FY 2023/2024 and 2025/2026 budget years plus a slight cost-of-living increase. FY 2027/2028 will be an assessment year again. Overall, the Water Quality enrolled acres remain steady and the budget is stable.

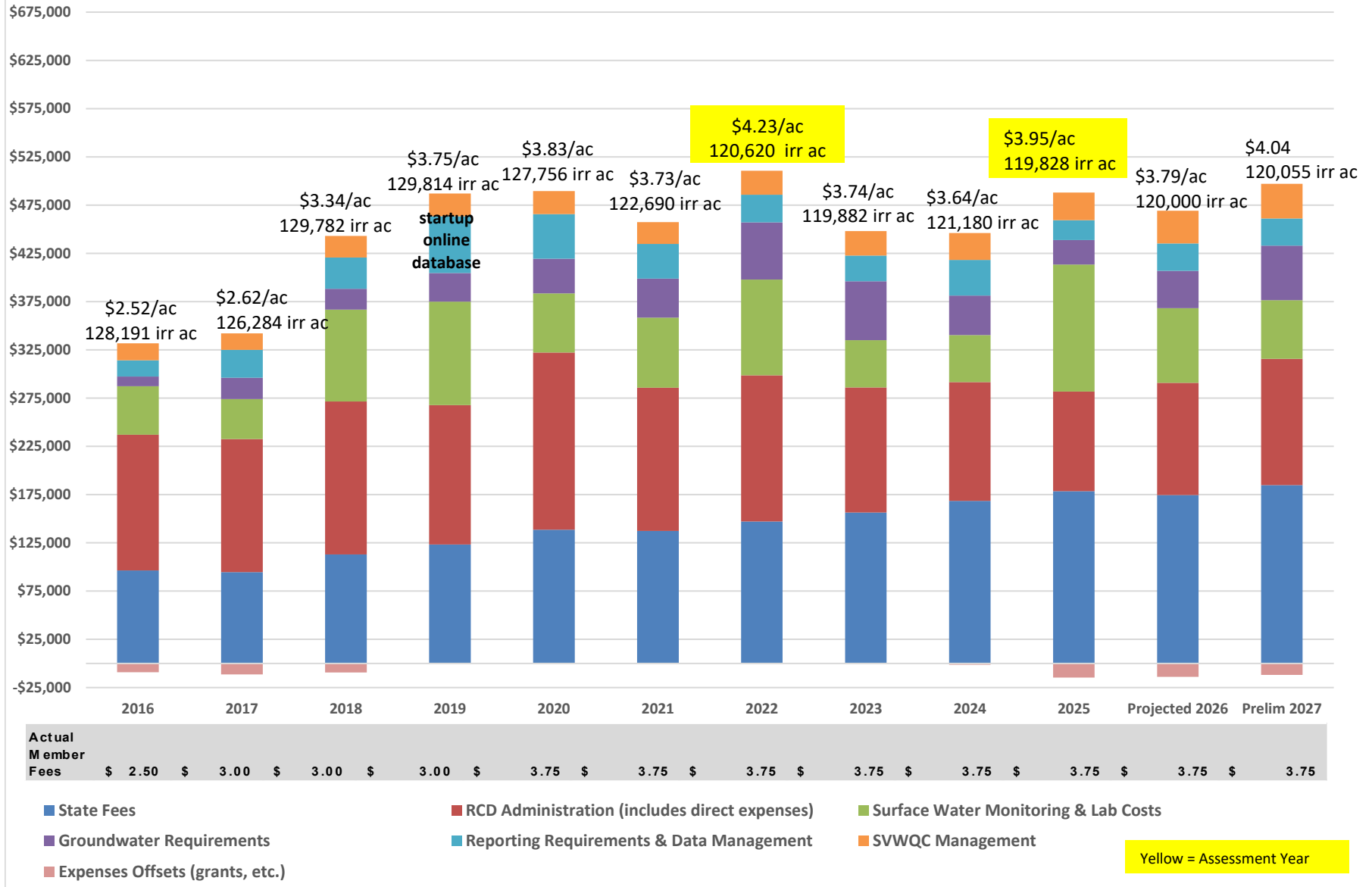
Year	Monitoring year type
FY 21-22	Assessment
FY 22-23	Core
FY 23-24	Core
FY 24-25	Assessment
FY 25-26	Core
FY 26-27	Core
FY 27-28	Assessment
FY 28-29	Core
FY 29-30	Core
FY 30-31	Assessment

ATTACHMENTS:

- 1.2-FY2025-2026 DSRCDWQC budget projected
- 1.3-FY2026-2027 DSRCDWQC budget prelim

Budget Code	2026 / 2027 Preliminary Irrigated Lands Budget - CASH FLOW	2026 / 2027 Budget	Year-to-Date	Total Remains	%	Notes
Monitoring Year		Core (Non-assessment)				
Beginning Fund Balance Actual		\$236,899.68	\$236,899.68			
Income						
9401	Interest Income	\$10,000.00	\$0.00	\$10,000.00	0.0%	Int. income approx. avg. of last 4 years
9669	Charges For Other Services (Annual Member Fees)	\$446,206.25	\$0.00	\$446,206.25	0.0%	Current Enrolled Irrigated acres 120,055 - less approx. \$4000 for Pasture No N credit
9668	Charges For Other Services (New Acres)	\$0.00	\$0.00	\$0.00	0.0%	
9669	Charges For Other Services (Late Fees)	\$0.00	\$0.00	\$0.00	0.0%	
9703	Other Revenue		\$0.00	\$0.00	0.0%	
Total Income		\$456,206.25	\$0.00	\$456,206.25	0.0%	
Total Funds Available		\$693,105.93	\$236,899.68	\$456,206.25		
Expenses						
2175	Miscellaneous Expense	\$0.00	\$0.00	\$0.00	0.0%	
2176	Fees and Permits (assume 100% enrollment)	\$184,886.90	\$0.00	\$184,886.90	0.0%	Project 5% State Board fee increase for 2026-2027 based on history of increases
2177	Documents / Records	\$1,200.00	\$0.00	\$1,200.00	0.0%	Parcel Quest cost share with DRCD and SRCD
2200	Office expense	\$1,400.00	\$0.00	\$1,400.00	0.0%	No change, includes copier costs
2205	Postage	\$800.00	\$0.00	\$800.00	0.0%	No change
2235	Accounting Service (Co. Account and Audit)	\$1,000.00	\$0.00	\$1,000.00	0.0%	Non-audit year
2238	Engineering	\$0.00	\$0.00	\$0.00	0.0%	
2239	Legal Services	\$0.00	\$0.00	\$0.00	0.0%	
2245	Contracted Services DRCD/SRCD Staff	\$121,390.00	\$0.00	\$121,390.00	0.0%	Based on staffing allocation & billable rates on DRCD budget, will have grant offset in FY 2027
2245	Contracted Services Instructors / Translation / Expert Advice	\$500.00	\$0.00	\$500.00	0.0%	No change
2250	Other Professional Services Surface Water Compliance	\$64,524.00	\$0.00	\$64,524.00	0.0%	Estimate based on an approx average of past three non-assessment years plus 10%
2250	Other Professional Services Groundwater Compliance	\$56,543.00	\$0.00	\$56,543.00	0.0%	Estimate based on SVWQC/WQ budget costs three-year avg. plus 10%
2250	Other Professional Services Coalition Reporting Requirements	\$28,186.00	\$0.00	\$28,186.00	0.0%	Slight increase based for revisions to the DMT
2250	Other Professional Services SVWQC Program Management	\$35,773.00	\$0.00	\$35,773.00	0.0%	Last year plus 5%
2261	Software Licenses & Maintenance Agreement	\$4,800.00	\$0.00	\$4,800.00	0.0%	Slight increase for texting service \$60 per/mo and website
2281	Advertising and Marketing (publications, etc.)	\$50.00	\$0.00	\$50.00	0.0%	No change
2295	Rents & Leases	\$5,200.00	\$0.00	\$5,200.00	0.0%	Inceased, includes 2nd office for ILRP farm reporting
2337	Meeting Refreshments	\$1,200.00	\$0.00	\$1,200.00	0.0%	No change
2335	Travel	\$200.00	\$0.00	\$200.00	0.0%	No change
2355	Mileage	\$350.00	\$0.00	\$350.00	0.0%	Slight increase, bank branch closed, have to drive to make a deposit
Total Expenses		\$508,002.90	\$0.00	\$508,002.90	0.0%	
Net Position		-\$51,796.65	\$0.00			
Ending Fund Balance (Budgeted)		\$185,103.03	\$236,899.68			
Minimum Fund Balance Reserve		\$100,000.00				
Ending Fund Balance Minus Minimum Fund Balance Reserve		\$85,103.03				

Water Quality Program Expenses for Fiscal Years 2016 - 2027 -updated May 2026



DIXON / SOLANO RCD WATER QUALITY COALITION

- Reinstatement fee of 20% of their annual fees or \$100 whichever is more plus all required farm reports.

Options:

- No change to current policy
- Reinstatement the membership policy if we can
- Another option

CONSIDERATIONS:

- No longer endless correspondence trying to get the farm reports.
- This becomes the Regional Board's task.
- Completion percentage for farm reporting may go up. Currently 99 -100% complete each year.
- An additional reinstatement admin fee could be considered as well to recoup staff time cost for the reinstatement of their membership.

ATTACHMENTS: 3.2 - FINAL DSRCDWQC Membership Policy FY20-21

Dixon/Solano RCD Water Quality Coalition

POLICY

POLICY TITLE: Membership

POLICY NUMBER: 1000

1000.1 Member. Per ORDER No. R5-2014-0300, Attachment E – Member is defined as owners and operators of irrigated lands within the Sacramento River Watershed that are members of a third-party group implementing this ORDER.

1000.2 Records. It is the responsibility of the member to keep ALL records held by the Dixon/Solano RCD Water Quality Coalition current (i.e. membership name, mailing address, phone number, email, parcel numbers, reporter (tenant) information and acres subject to the program, along with other confirmation requirements associated with a membership in good standing). It is NOT the responsibility of the Dixon/Solano RCD Water Quality Coalition staff and/or contractors to seek current records.

1000.3 Payment. Payment of member fees, is a requirement of membership in the Dixon/Solano RCD Water Quality Coalition. Membership fees are due 60 days from the date of invoice (usually October 1st invoice with December 1st due date). If member fees have not been received prior to July 1st annually, membership will be revoked and reported on annual member list to the Regional Board. In order to reinstate a revoked membership, the member will be required to re-enroll with the Dixon/Solano RCD Water Quality Coalition and pay all unpaid fees AND a re-instatement penalty fee equal to 20% of current year member fees OR \$100, whichever is more

The following actions will be taken and documented by staff for membership revocation.

1. Original invoice mailed/emailed with assigned due date of December (October)
2. Second notice mailed/emailed (January)
3. Final notice mailed/emailed (March/April)
4. Phone calls/emails (May/June)
5. Registered and return receipt mailed to member stating “Notice of Membership Revocation” if payment is not received by July 1st.

1000.4 Member Reporting Requirements. Completion and submittal of all farm reporting forms as required under the Order, are mandatory to maintain membership in the Dixon/Solano RCD Water Quality Coalition.

Late Fees: All required reports are due by February 15th. Memberships with farm reporting submitted after February 15th deadline (online date-stamped or over the phone with a staff person) will be charged a late fee of equal to 20% of current year member fees OR \$100, whichever is more.

Waived Late Fees: Each owner/reporter (member) has the right to request a one-time late fee waiver for each membership/account. The member is required to write a letter with the reason why they are requesting the late fee to be waived and for which membership/account (s). The WQC Staff will grant this request and log the membership/account name and number and notify the member in writing (email) that their one-time late fee has been waived.

Failure to Report: If member does not complete the required farm reporting by July 1st annually, the member will be reported to the Regional Board on the annual participant's list as failure to complete the annual farm reporting and for fulfilling the education requirement The Regional Board will follow-up with the member with a letter of non-compliance.

The following actions will be taken and documented by staff for failure to report.

1. Original information notification with assigned due date of Feb 15th (Nov-Dec)
2. Second information notification (January)
3. Final information notification with late fee invoice (March)
4. Phone calls/emails(May/June)

Registered and return receipt mailed to member stating " membership in the Coalition is no longer in good standing and notification will be sent to the Regional Board for the failure to complete the annual farm reporting and education requirement of the Irrigated Lands Program if reporting is not completed by July 1st.

Example 1:

Member X Owns 10 acres Annual member fee: \$30.00 PAID

Annual Invoice sent in October

Payment due in December

June 15th Certified Letters sent

July 1st Membership Revoked for failure to pay

Reinstatement 20% of \$30.00=\$6.00 so fees are **\$100.00**

Member owes \$200.00 plus required reporting to reinstate their membership.

Example 2:

Member Y Owns 1000 acres Annual member fee: \$3000.00 PAID

Annual Invoice sent in October

Payment due in December

January-May: Reminders sent

June 15th Certified Letters sent

July 1st Membership Revoked for failure to pay

Reinstatement 20% of \$3000.00=\$600.00 so fees are **\$600.00**

Member owes \$1200.00 plus required reporting to reinstate their membership.

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Action Needed:

- No change, Option 1
- Adopt proposed streamlined policy, Option 2
- Propose a different option

CONSIDERATIONS:

- Figuring in text as the primary correspondence
- Our invoices to Sac-Valley Water Quality Coalition for state fees are in two installments in December and March
- Option 2 reduces the number of emails and a final notice mailing
- Staff time will be reduced by approx. one-third or 15 hours and a cost reduction of approx. \$1,050 annually.

Option 1:

Current correspondence for farm reporting/late reporters:

December 1 – Farm reporting email/letter
January – Email reminder
February – Email reminder, late reporting invoices (25 avg.)
March – Email/letter, name being placed on the late reporter list (15 avg.)
April 1 – Late reporter list sent to Regional Board, reminder letter
May – Email and phone calls to notify owner if they are not the reporter
June – Certified letter (4 avg.)
July 1 – Name on the participant's list sent to the Regional Board, NOV-Notice of Violation

Option 2:

Proposed more streamlined correspondence for farm reporting/late reporters:

December 1 – Farm reporting detailed email/letter is sent
February – Text reminder, late reporting invoices
April 1 – Late reporter list sent to RB, reminder letter
May – Text and/or phone calls to notify owner if they are not the reporter
June – Certified letter
July 1 – Name on the participant's list sent to the Regional Board, NOV-Notice of Violation (Or Name on the dropped list if membership policy is changed.)

Action Needed:

- No change, Option 1
- Adopt proposed streamlined policy, Option 2
- Propose a different option

CONSIDERATIONS:

- Figuring in text as the primary correspondence
- Staff time will be reduced by approx. 10-15 hours and a cost reduction of approx. \$700-\$1,050 annually.

ATTACHMENTS: None

DIXON / SOLANO RCD WATER QUALITY COALITION

TO: Coalition Advisory Committee **Agenda Item No.** 6.1
Meeting Date: 05-27-2026

FROM: Martha McKeen and Kelly Huff

DATE: May 22, 2026 Action Item
 X No Action Requested

SUBJECT: Coalition and Program Update – Enrolled acres, GSA, DMT, DWW, GWPT, AB 2447 Bill and CV SALT requirements

NO ACTION REQUIRED: INFORMATIONAL ONLY

Dixon/Solano RCD Water Quality Staff will update the Advisory Committee on the above Coalition items.

ENROLLED ACRES:

The enrolled irrigated acreage in the D/S RCD Water Quality Coalition appears stable.

2027 – 120,055 irrigated acres	2024 – 121,180 irrigated acres
2026 – 120,000 irrigated acres	2023 – 119,882 irrigated acres
2025 – 119,828 irrigated acres	2022 – 120,620 irrigated acres

We continue to monitor the nearly 2500 acres around Dixon/Vacaville area that are either currently going to be developed or are being discussed as potential development areas over the next several years.

GROUNDWATER SUSTAINABILITY AGENCY (GSA):

Coordination efforts with the local GSAs continues by assisting with outreach and well recruitment for areas with data gaps to local well owners in the lower portion of Solano County. This effort consists of sending letters along with the sampling agreement. The well sampling is mainly tracking water levels and also water quality, if owner agrees, at no-cost and they can request the sampling results to be sent to them. Our staff time cost is currently being supported with grant funds from a CA Department of Water Resources (DWR) Implementation Grant.

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DATA MANAGEMENT TOOL (DMT) WATER USE DATA:

The DMT reporting for groundwater/surface water use on crops continues to be useful information and has proved to be beneficial to fill data gaps for the GSA. Dixon/Solano RCD Water Quality Coalition Staff are always on the lookout for ways to coordinate efforts with other agencies and share information to help avoid duplicative data collection from landowners and growers.

DRINKING WATER WELLS (DWW):

As of January 2022, all members with actively used drinking water wells on enrolled parcels needed to have their well tested for nitrates. At the end of 2025, 356 Sac-Valley landowners qualified to reduce the testing to every five years since they had tests that resulted in nitrates as nitrogen less than 8 mg/L for three consecutive years.

Drinking Water Well Sampling Statistics					
Statistics from the Regional Board as of May 5, 2026:					
Sac-Valley 2025		Sac-Valley 2026		Sac-Valley difference from 2025 vs. 2025	
Total samples submitted	3960	Total samples submitted	4518	558	more samples
Exceedances	439	Exceedances	480	41	more exceedances
% of samples exceeding DW limit	11.0%	% of samples exceeding DW limit	10.6%	-0.4%	less samples that exceed DW limit
Solano 2025		Solano 2026		Solano difference from 2025 vs. 2026	
Total samples submitted	484	Total samples submitted	528	44	more samples
Exceedances	117	Exceedances	122	5	more exceedances
% of samples exceeding DW limit	24.2%	% of samples exceeding DW limit	23.1%	-1.1%	less samples that exceed DW limit
Out of all Sac-Valley exceedances, % that came from Solano	27.7%	Out of all Sac-Valley exceedances, % that came from Solano	25.4%	-2.3%	Overall, less exceedances coming from Solano

GROUNDWATER PROTECTION TARGETS (GWPT):

Groundwater Protection Targets have been developed and submitted to the Regional Board for HVA - high vulnerability area - townships in the Central Valley, including Solano County. Coalitions are now working to update Groundwater Management Plans that show how those targets will be achieved. Workshops will be scheduled when the new target requirements for nitrogen are in place for affected growers in the Sac-Valley.

AB 2447 BILL UPDATE:

If you haven't heard about AB 2447, it is a bill, if passed, requires the State Water Resources Control Board and Regional Water Quality Control Boards to establish enforceable limits on nitrogen discharges from agricultural lands. The bill would require regional boards to adopt revised orders with waste discharge requirements on or before January 1, 2028, that are sufficient to meet certain reductions in nitrogen waste discharges. The bill would require the state board to, on or before July 1, 2027, publish both a list of standardized crop names and categories, and a statewide methodology for calculating, and field-level reporting of, nitrogen balances for

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croplands, including nitrogen fertilizer applications and nitrogen discharges, that account for available soil nitrogen, to be used by the regional boards and incorporated into the revised orders. The bill would require the state board, on or before January 1, 2031, and in coordination with the regional boards, to submit a report to the relevant policy committees of the Legislature on progress achieved in implementing these requirements, including data on the extent of progress made toward reducing nitrogen waste discharges, as provided.

The coalition has been closely watching this and wrote a letter of opposition to the assembly in April. Good news is that AB 2447 was suspended by the Assembly Appropriations Committee on May 14, 2026, eliminating the chances of passing this year. Attached is a copy of the letter written by California's farmers, ranchers, processors, and allied agricultural businesses from all over California. [AB 2447 Oppose Letter](#)

The Coalition continues to stay involved and will keep growers updated as we learn more.

CV SALTS - CENTRAL VALLEY SALINITY ALTERNITIVE LONG-TERM SUSTAINABILITY:

In 2020, coalitions in high-priority (Priority 1) areas of the Southern Central Valley received notices to comply with the CV SALTS Nitrate Control Program, along with all permitted dischargers that could contribute nitrates (e.g. dairies, processing facilities, wastewater treatment plants and like facilities).

Yolo County is the only prioritized region (Priority 2) in the Sacramento Valley. The Yolo County Farm Bureau's subwatershed coalition charges an additional fee (\$2.15/acre) for CV SALTS program for the ILRP members. Free well water sampling is available and distribution of clean drinking water is provided to those who have water samples over the safe drinking water limits for nitrates as nitrogen exceeding 10 mg/L.

Solano County remains a non-prioritized region. The Coalition Staff will continue to track this process and keep the committee and board members informed as needed.

ATTACHMENTS: 6.2 - AB 2447 Oppose Letter



April 27, 2026

The Honorable Buffy Wicks
 Chair, Assembly Appropriations Committee
 1021 O Street, Suite 8220
 Sacramento, CA 95814

RE: AB 2447 (Bauer-Kahan) – Oppose

Dear Chair Wicks:

On behalf of California’s farmers, ranchers, processors, and allied agricultural businesses, we must respectfully oppose AB 2447. As residents of agricultural and rural communities, we share the goal of protecting groundwater quality and ensuring safe drinking water for all Californians. For this reason, we have engaged with the State Water Resources Control Board (State Water Board) and regional water boards for decades to investigate, monitor and attempt to remedy long-standing water quality issues across the State. And while we share your interest in hastening this process, we express our concerns here with the approach proposed in AB 2447.

First, AB 2447 is premised on an incorrect assumption that nitrogen discharges from irrigated agriculture are unregulated. Contrary to this assumption, California agriculture operates under one of the most comprehensive regulatory frameworks in the nation. Starting in or around 2003, discharges of waste from irrigated agricultural operations have been regulated by regional water quality control boards through Conditional Waivers or Waste Discharge Requirements. Such regulatory requirements have evolved over time resulting in today's comprehensive Irrigated Lands Regulatory Program (ILRP), which is administered by the State Water Board and the regional boards.

Under the current program, agriculture throughout California is regulated through Waste Discharge Requirements, which require various levels of enrollment, surface and groundwater monitoring, Irrigation and Nitrogen Management Plans, Farm Plans, nitrogen applied reporting and more. Through the ILRP, more than 30,000 farms and ranches are enrolled statewide, covering millions of irrigated acres. Based on State Water Board data, to date 89% of irrigated farmland is currently enrolled in ILRP, with the remaining to be enrolled soon.¹

In some regions, third party coalitions help to administer these programs and coordinate efforts amongst vast agricultural acreages. The leading example of coalition efforts occurs in the Central Valley where there are 14 coalitions working with over 25,000 individual grower operations covering over 5 million acres of irrigated farmland. The Central Valley coalitions collect nitrate application and crop yield data from their growers to estimate the amount of nitrate that may potentially leach to groundwater or runoff into surface water. Once the data is collected, the coalitions annually submit this information, along with detailed analysis of the information, to the Central Valley Regional Water Quality Control Board (Central Valley Water Board). The Central Valley Water Board reviews this information for its accuracy, conducts farm inspections, evaluates grower compliance, and brings enforcement actions against non-compliant growers when necessary.

Moreover, coalitions regularly conduct surface and groundwater monitoring, per a methodology directed in WDRs. Groundwater monitoring includes requirements on growers to individually test on-farm domestic wells for nitrate and provide notice to those reliant on domestic wells if the well exceeds the nitrate drinking water standard. In the Central Valley, through the region's preeminent Nitrate Control Program, growers along with other nitrate dischargers, offer free domestic well testing and replacement drinking water as an interim approach for those reliant on groundwater. There are also significant efforts taking place to identify and implement long-term drinking water solutions.

To date, substantial progress has been made by growers, coalitions and other third-party groups in all facets of ILRP. Specifically, irrigated lands coalitions working with the Central Valley Water Board have achieved the following in recent years:

- Completed Groundwater Quality Assessment Reports to delineate areas across the Central Valley that are vulnerable to nitrate contamination and characterize current groundwater quality conditions
- Established Groundwater Trend Monitoring programs to track changes in groundwater quality
- Established annual grower-reporting programs to understand trends in implemented practices and nitrogen application ("A") and removal ("R") rates for all parcels enrolled in the ILRP
- Developed Management Practice Evaluation Programs to identify, evaluate, and promote practices that are protective of groundwater quality
- Created a robust and comprehensive Groundwater Protection Formula, Values, and Targets approach to estimate current nitrate discharge rates at the field-scale and consider local hydrologic conditions; establish and routinely revise (every five years) targeted township-based

¹ https://www.waterboards.ca.gov/about_us/performance_report_2122/regulate/241_irrigated_lands.html

(6-mile x 6-mile) discharge rates that are protective of groundwater quality; and track progress towards these Targets over time

- Proposed crop-specific Acceptable Ranges of A/R to establish agronomically appropriate nitrogen use efficiencies based on research and the current grower-reported distribution of A/R ratios by crop and identify growers outside of the Acceptable Ranges for follow-up actions
- Established Groundwater Quality Management Plans to synthesize the above information into coherent plans to manage irrigated agriculture's impact on groundwater quality
- Conduct annual, ongoing grower outreach and education to inform growers of the need to protect groundwater quality from the impacts of nitrogen applications through the use of best management practices

This framework integrates monitoring, detailed reporting, state of the art modeling, local water quality, individual grower-based efficiency metrics, and outreach and education to growers and their advisors to chart a clear path forward towards protecting water quality while sustaining a vibrant agricultural landscape. Such accomplishments represent a substantial body of work that informs the collective understanding of the state of nitrate issues and what is needed to address them. Considering the regulatory systems currently established and its successes to date, the claim that nitrogen application is unregulated is simply inaccurate.

Second, to assume the State Water Board and regional boards are relying on the status quo to address water quality issues is also a falsehood. The State Water Board recently convened the Second Statewide Agricultural Expert Panel to evaluate nitrogen management, and feasible regulatory metrics. This panel, consisting of scientists, agronomists, university researchers and nutrient management experts have been evaluating vast amounts of data collected through the ILRP, taking public testimony, and are developing their final expert recommendations to the State Water Board. Their process is set to be completed no later than June of this year. AB 2447 would effectively pre-judge and override this time intensive, objective, technical process by imposing prescriptive statewide mandates before scientific consensus and feasibility determinations are complete. Legislatively mandating specific nitrogen discharge standards on an accelerated timeline risks replacing an evidence-based approach with statutory rigidity.

AB 2447 also seeks to undermine a key tenant of the ILRP—a recognition that farm-level nitrogen application information is highly sensitive operational data and publicly disclosing this data at an individual level creates significant risk without improving environmental outcomes. Because of the proprietary nature of farm characteristics reflected in nitrogen application rates (crop type, rotational strategy, yield, irrigation and soil management techniques, etc.), much of the reporting under ILRP is currently managed by coalitions. Notably, all grower data is reported to the regional water boards. However, in some regions, the data is anonymized on a grower level and parcel level before being submitted to the respective regional board. Although anonymous, the regional water boards have sufficient information to evaluate grower compliance with WDRs and have the ability to identify growers that are not making improvements towards protecting groundwater and surface water quality. This approach has been found to be appropriate by the State Water Board and the courts because it incentivizes grower participation in coalitions, promotes accuracy in reporting, allows coalitions to work directly with growers, and provides the State Water Board and regional boards with data and information necessary to evaluate the efficacy of the ILRP.

Beyond duplication, AB 2447 requires compliance with strict standards under an impossible timeline. Simply put, under current agricultural practices and knowledge, it is nearly impossible for all of California agriculture to comply by the date proposed. AB 2447 requires agricultural operations to “not cause or contribute” to nitrate exceedances, coupled with nitrogen application limits, by 2030. Nitrogen cycling in the soil is influenced by a variety of factors.

AB 2447 would cement in place a one-size-fits-all approach that does not account for the diversity of production, regional hydrogeology, crop nutrient demands, soil mineralization rates, irrigation methods and legacy nitrate issues. This approach will result in disproportionate impacts on growers in certain basins, particularly the Central Valley and coastal regions, creating inequitable burdens for rural communities that already face economic challenges. In 2020, a well-known and respected economics firm evaluated the impact of nitrogen application and discharge limits being considered by the Central Coast Water Board. In their evaluation, the firm looked at the economic impact specifically for Monterey County and lettuce production exclusively. The study found that these restrictions would result in a county-wide economic loss of \$683 million annually, job loss of 11,340 positions and the probability of a farm generating revenue greater than costs falls to 14%.

(ERA Economics LLC, 2020).² This limited analysis illustrates the magnitude AB 2447 would impose across California by taking the same approach across all commodities and all regions as evaluated by ERA Economics.

Time-over-time, the State Water Board has recognized that even with precision agriculture, cover cropping, and advanced fertigation systems, it is scientifically impossible to guarantee zero contribution to exceedances in every hydrologic setting. This is evidenced by, among other things, the State Water Board's remand of the Central Coast WDR that included limits similar to those being required by AB 2447. In short, the State Water Board remanded the WDR because it found the imposition of such limits to be premature until more information is available. (State Water Board Order WQ 2023-0081).³ As a result of this decision, the State Water Board created the Second Statewide Ag Expert Panel and charged them with evaluating the potential for limits or targets to be imposed over variable time horizons. As noted previously, the Second Ag Expert Panel is in the middle of developing their final recommendations, which are expected to be finalized by the end of June this year. While we await the final report in June 2026, the panel's draft recommendations released in 2025 found "...based on scientific and technical considerations the Panel recommends that limits are not required statewide or as a precedential tool to be used by Regional Boards."⁴

In addition to the time and agronomic infeasibility of the provisions of AB 2447, the bill would institutionalize an entirely new water quality program and fees to support implementation on a community not healed to bear the new and growing costs. The current water quality program costs in place are funded through fees on farmers. Coalition monitoring, domestic well testing, nitrate replacement water programs and compliance administration already cost the agricultural community tens of millions annually. In addition to pivoting these obligations to the State and regional boards, AB 2447 would increase data reporting requirements, and require an entirely new level of regulatory oversight and enforcement capacity at the regional water boards and the State Water Board. For example, in 2010, the Central Valley Water Board published its Environmental Impact Report for the ILRP as proposed in the Central Valley. As part of the EIR, the Central Valley Water Board had prepared an economic impact analysis of the regulatory alternatives, one which included a program similar to that envisioned by AB 2447. According to that analysis, the Central Valley Water Board alone would need over 400 PYs to implement a program that required individual grower reporting to the Central Valley Water Board.

² [ERA Economics LLC, Technical Memorandum: Example Economic Impacts of the Central Coast Water Board Ag Order 4.0, prepared for Kahn, Soares & Conway LLP \(Davis, CA: ERA Economics, June 19, 2020\)](#) .

³ State Water Resources Control Board, *Order WQ 2023-0081: In the Matter of Review of General Waste Discharge Requirements for Discharges from Irrigated Lands, Order No. R3-2021-0040, Issued by the California Regional Water Quality Control Board, Central Coast Region, SWRCB/OCC Files A-2751(a)-(b)* (Sept. 20, 2023), https://www.waterboards.ca.gov/public_notices/petitions/water_quality/docs/2023/wqo2023-0081.pdf.

⁴ 2025-2026 State Water Resource Control Board. Second Expert Panel, Version 9 Draft Report. https://www.waterboards.ca.gov/water_issues/programs/agriculture/2025-expert-panel.html

The cost of these PYs would be borne by growers, further limiting agriculture's ability to survive economically in a time of increased water costs, increased input costs and depressed commodity prices. Moreover, for many small- and mid-sized farms operating on thin margins, particularly in specialty crops, additional regulatory fees required to implement AB 2447 will exceed their capacity to pay. In regions already facing water scarcity, regulatory expansion, market competition and rising labor costs, this bill will accelerate farm exits and consolidation.

Finally, AB 2447 undermines the role of the coalitions under ILRP and implementation of the Nitrate Control Program. Ultimately, the bill would result in dismantling the coordination and financing for domestic well testing and, where contamination is identified, drinking water replacement for affected households.

In short, nitrate contamination in groundwater is a decadal long challenge for the State regardless of grower practices today. Over the decades, growers have followed and employed the best scientific and state-supported research on application rates and fertilization management practices. Data shows that even if growers applied zero nitrogen fertilizer and essentially stopped farming, water quality issues will persist in some areas for over a hundred years. Importantly, California agriculture is committed to improving water quality, protecting public health and advancing the best precision agricultural practices possible. To that end, the existing ILRP framework, regional orders, coalition monitoring, and ongoing expert review provide a robust and iterative pathway for progress grounded in science and regional adaptability. AB 2447 replaces that adaptive framework with rigid mandates, exposes growers, communities and the state to unsustainable burdens, and generates unintended harm.

For these reasons, we respectfully oppose AB 2447 and urge a collaborative approach that builds upon, rather than dismantles, California's existing regulatory structure.

Sincerely,



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Tricia Geringer, Vice President of Government
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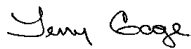
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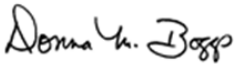
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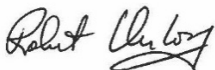
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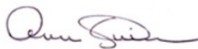
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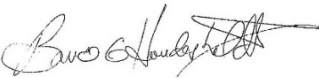
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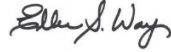
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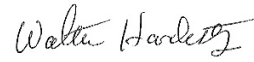
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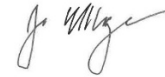
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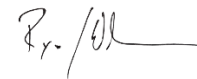
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Brian Greathouse, President
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cc: The Honorable Rebecca Bauer-Kahan, California State Assembly
Members, Assembly Appropriations Committee