



Irrigated Lands Program
INMP Exemption(s)
Technical Report
Approval Process

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INMP Exemptions Overview

There are three (3) exemptions outlined in the [Agricultural Order](#) that can exempt growers from having to report certain information in sections of the Irrigation and Nutrient Management Plan (INMP) Summary Report. To obtain approval of any of the three (3) exemptions, growers must submit a technical report that provides the information required for the exemption they are requesting. This guidance document specifies the minimum required information that must be included in a technical report and the approval process.

No Threat to Surface Water or Groundwater Quality

Condition 22¹

*“Dischargers who can quantifiably demonstrate that their ranches pose no threat to surface water quality or groundwater quality may submit a technical report to the Executive Officer for review. If approved, the Discharger is not required to conduct the nitrogen application (A) or removal (R) monitoring and reporting or to submit the INMP Summary Report, regardless of what Groundwater Phase area the ranch is in. **The technical report must demonstrate that nitrogen applied at the ranch does not percolate below the root zone in an amount that could degrade groundwater and does not migrate to surface water through discharges, including drainage, runoff, or sediment erosion.** Dischargers must provide the Executive Officer with annual updates to confirm that the exemption is still applicable. Failure to provide sufficient annual updates confirming that the exemption is still applicable will result in an immediate reinstatement of the requirement to submit the INMP Summary Report for applicable Dischargers. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway for groundwater protection.”*

Exempted INMP Summary Report Information

If a condition 22 exemption is approved, the grower is not required to conduct the nitrogen application (A) or removal (R) monitoring and reporting or to submit the INMP Summary Report.

Technical Report Minimum Required Information

The technical report for a condition 22 exemption must at a minimum, include:

General Ranch and Operation Information

1. Operation identification (AW) number,
2. List of activities and any other changes implemented, specific to achieving the objective of eliminating the ranch’s threat to surface water and groundwater quality (e.g., no nitrogen applications, no nitrogen discharge, control of all nitrogen discharge),
3. Ranch identification (AGL) number,
4. Ranch name,
5. Ranch address,

¹ Agricultural Order, Page 27, Number 22

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/ag_order4/2021/ao4_order.pdf

6. Ranch assessor parcel number(s),
7. Ranch map(s) that include information on wells location, discharge points, conveyances features (e.g., ditches) and surrounding area,
8. Proximity to nearest surface waterbody(s), and
9. Soil type(s).

General Ranch History

10. History of crops and associated crop acres grown on ranch,
11. History of compliance/non-compliance with Ag Order monitoring and reporting requirements (e.g., third-party program participation status, complaints, on-time/past due monitoring and reporting submittals, Notice of Violation(s), other enforcement issues),
12. History of water quality issues and irrigation discharge (groundwater and surface water) from ranch (e.g., individual ranch monitoring results, previously required under Ag Order 2.0 or 3.0 to conduct individual ranch monitoring, previously required to submit additional information or technical reports according to the California Water Code Section 13267),
13. The sum of water quality improvement projects and management practices implemented on the ranch to eliminate any threat(s) to surface water and groundwater quality, must be reported in the annual compliance form.

Supporting Documentation

14. Supporting information that provides ranch-specific justification, ranch characteristics, the farming activities, and implemented management practices that quantifiably demonstrate the ranch poses no threat to surface and groundwater quality². At a minimum, the technical report must include all the information listed below for either Option 1, Option 2, or Option 3.

Annual Confirmation Information

15. Identification of specific data, values, calculations, or information proposed to be reported annually to verify that condition 22 exemption is still applicable.

Option 1. No Nitrogen Applications

16. Identification of crop name and crop acres produced without nitrogen applications from organic and/or conventional fertilizers, compost, amendments, or products containing nitrogen,
17. Identification of crop names and crop acres produced only by utilizing (pumping and fertilizing) the nitrogen present in the water used for irrigation (i.e., pounds of nitrogen applied in irrigation water),
18. Identification of crop non-legume crops and crop acres produced (e.g., lettuce) in rotation with legume crops and/or cover crops that can capture nitrogen from the air via fixation
19. Identification of crop names and crop acres produced along with legume crops in rows that capture nitrogen from the air via fixation and allows for production of a commercial crop without any fertilizer inputs (without organic

² As specified in Page 27 of the Ag Order, Condition 22.

and/or conventional fertilizers, compost, amendments, or products containing nitrogen).

Option 2. No Discharge

20. On an annual basis, demonstrate that the total volume of irrigation water applied plus rainwater is entirely captured by the crop(s). You must submit documentation demonstrating that the irrigation water applied does not percolate below the root zone (e. g. detailed water budget including soil types), moisture retention information, volume of irrigation plus rainwater applied compared to the crops water demand such as crop evapotranspiration, description of the irrigation system efficiency and performance, and a detailed description of the irrigation scheduling (frequency and duration), and
21. On an annual basis, submit documentation demonstrating that the total amount of nitrogen applied is completely captured by the crop(s), (e.g., amount of nitrogen applied and nitrogen removed at harvest).

Option 3. The Discharge does not Degrade Surface and/or Groundwater Quality

22. Demonstrate that irrigation water does not migrate below the crop's root zone towards groundwater and does not migrate to surface water.
23. Relevant and extensive information on the presence and extent of impermeable soil layers such as hard pans, or the presence and extent of low permeability soils combined with saturated conditions, which result in a chemical reducing environment that favors the conversion of nitrate to nitrite and volatile gases (i.e., denitrification).
24. Information on the first-encountered groundwater quality to confirm it does not contain nitrate concentrations (measured as nitrogen) greater than the MCL (10 mg/L).
25. Substantiation of the irrigation and drainage system components, irrigation performance and management, including layouts of both the irrigation and the drainage system components, including the presence of any frost protection irrigation systems.
26. Map(s), graph(s) and/or picture(s) identifying and describing all water conveyances and all water management features, including specifications related to the presence of shallow groundwater, if any.
27. Map(s) identifying well(s) that have been monitored to assess groundwater quality.
28. Well construction information for the monitored well(s), including groundwater elevations for each well.
29. Certified laboratory analytical results of groundwater samples from on-farm wells and private or public wells located within a 5-mile radius (i.e., detections and non-detections of nitrate [measured as nitrogen]), for any past year that could be used as baseline.
30. Certified laboratory analytical results of surface water samples of the individual ranch level discharge or surface receiving waterbodies (i.e., detections and non-detections of nitrate [measured as nitrogen]), of any past year that could be used as baseline.

Achieving Final Nitrogen Discharge Target(s)

Condition 23³ Language

*Dischargers who can quantifiably demonstrate that their ranch is achieving the final nitrogen discharge target, as shown in Table C.1-3, are not required to submit the nitrogen removal (R) reporting in the INMP Summary Report, regardless of what Groundwater Phase area the ranch is in. **Example situations where this may apply include participation in an approved third-party program that certifies that the Discharger is meeting the final discharge target and will continue to do so for the duration of the Discharger's participation in the approved third-party program, or by submitting a technical report, subject to Executive Officer review, that quantifies the amount of nitrogen discharge based on the volume and nitrogen concentration of all discharges from the ranch.** In these situations, confirmation of membership in the approved third-party program or Executive Officer approval of a submitted technical report constitute compliance with the nitrogen removed (R) reporting requirement in the INMP Summary Report. This exemption only applies to removal (R) in the INMP Summary Report; all other requirements, including the TNA report, still apply as described in this Order. Dischargers must provide the Executive Officer with annual updates to confirm that the exemption is still applicable. Failure to provide sufficient annual updates confirming that the exemption is still applicable will result in an immediate reinstatement of the requirement to submit the nitrogen removal (R) reporting information in the INMP Summary Report for applicable Dischargers. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway for groundwater protection.”*

Exempted INMP Summary Report Information

If a condition 23 exemption is approved, the grower is not required submit the nitrogen removal (R) reporting in the INMP Summary Report, regardless of what Groundwater Phase area the ranch is in; all other INMP Summary Report requirements, including total nitrogen applied and information associated with irrigation management (crop evapotranspiration and the estimation of irrigation discharge to surface water), still apply and must be reported in Geotracker prior to the approval of the exemption request.

Technical Report Minimum Required Information

The technical report for a condition 23 exemption must at a minimum, include:

General Ranch and Operation Information⁴

1. Operation identification (AW) number,
2. List of activities and any other changes implemented to achieve the final nitrogen discharge target (e.g., reductions in the amount of nitrogen applied in fertilizers, increases in the amount of nitrogen removed at harvest, and/or increase the utilization of nitrogen applied in the irrigation water),
3. Ranch identification (AGL) number,

³ Agricultural Order, Page 28, Number 23

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/ag_order4/2021/ao4_order.pdf

⁴ In the case that multiple ranches are included in a proposal under the same exemption request but with a slightly different justification, a list of ranches would be acceptable (for example in a excel table) including each ranch minimum required information, and each ranch's specific rational/justification for the exemption request.

4. Ranch name,
5. Ranch address,
6. Ranch assessor parcel number(s).

General Ranch History

7. Compile and submit one (1) year of the information reported in the Total Nitrogen Applied form,
8. History of crops and associated crop acres grown on ranch,
9. History of compliance/non-compliance with Ag Order monitoring and reporting requirements (e.g., third-party program participation status, complaints, on-time/past due monitoring and reporting submittals, Notice of Violation(s), other enforcement issues),
10. History of water quality issues and irrigation discharge (groundwater and surface water) from ranch (e.g., individual ranch monitoring results, previously required under Ag Order 2.0 or 3.0 to conduct individual ranch monitoring, previously required to submit additional information or technical reports according to the California Water Code Section 13267),
11. The sum of water quality improvement projects and management practices implemented to achieve the final discharge targets, must be reported in the annual compliance form.

Supporting Documentation

12. Supporting documentation that quantifiably demonstrates the ranch is achieving the final nitrogen discharge targets as shown in Table C.1-3:
13. Description of the irrigation and drainage system components, irrigation performance and management, including layouts of both the irrigation and the drainage system components, including the presence of any frost protection irrigation systems,
14. Map(s), graph(s) and/or picture(s) identifying and describing all water conveyances and other water management features, including specifications related to the presence of shallow groundwater, if any,
15. Ranch level data or monitoring results that quantifiably demonstrates the ranch is achieving one of the final nitrogen discharge targets. Examples of data or monitoring results include but are not limited to:
 - a. Total amount of nitrogen applied (if the application of nitrogen to the ranch is lower than the final target, that can be provided as the justification for this exemption request),
 - b. Amount of nitrogen applied in irrigation water that is utilized to reduce the nitrogen applied in fertilizers,
 - c. Quantification of the total amount of nitrogen applied minus the total amount of nitrogen removed (if the difference is less than 50 Lbs./acre/year, that can be provided as the justification for this exemption request),
 - d. Ranch level discharge monitoring results (volume and nitrogen concentrations) demonstrating that nitrogen discharged from the ranch basis is less than 50 Lbs./acre/year.

Annual Confirmation Information

16. Identification of the specific data, values, calculations, or information proposed to be reported annually to verify that the Condition 23 exemption is still applicable, and
17. Explanation for why the proposed annual reported information is consistent with the justification included in the exemption request (e.g., the total amount of nitrogen applied, the difference between the A minus R, or the results of the monitoring program).

Compliance Through Direct Monitoring of Discharge

Condition 24⁵ Language

*“Dischargers, groups of dischargers or commodity groups who can quantify the amount of nitrogen discharged from their ranch or for specific crops or via specific management practices by directly monitoring it at the points of discharge can propose an alternative monitoring methodology to comply with the nitrogen discharge targets, in lieu of using the A-R compliance formulas. Example situations where this may apply include greenhouse, nursery, container production or intensive crop production where irrigation and drain water is captured and allows for direct monitoring of discharges. For these types of situations, it may be easier to monitor nitrogen discharge than to calculate the amount of nitrogen removed at harvest for each one of the many different crops and plants being grown. **Dischargers must submit a request to the Executive Officer with a technical report of the methodology proposed to quantify nitrogen discharges. The methodology must include enough information to quantify the amount of nitrogen discharged and confirm compliance with the nitrogen discharge targets and targets, as shown in Table C.1-3 or Table C.2-2 (for Dischargers participating in the Third-Party Alternative Compliance Pathway Program for Groundwater Protection described in Part 2, Section C.2). Acceptable methodologies must include direct measurements of the volume and nitrogen concentration of the water discharged from each ranch per acre and year. Executive Officer approval of the method(s) must be granted before the discharger begins reporting nitrogen discharge based on the proposed methodology. Dischargers who obtain Executive Officer approval to directly monitor their nitrogen discharge from their ranches will not be required to submit nitrogen removal (R) reporting in the INMP Summary Report. Dischargers electing to use this approach are still eligible to participate in the third-party alternative compliance pathway program for groundwater protection.**”*

Exempted INMP Summary Report Information

If a condition 24 exemption is approved, the grower is not required to report the nitrogen removal (R) section of the INMP Summary report; all other requirements, including the TNA report and the information associated with irrigation management (crop evapotranspiration and the estimation of irrigation discharge to surface water), still apply and must be reported in Geotracker prior to the approval of the exemption request.

Technical Report Minimum Required Information

The technical report for a condition 24 exemption must at a minimum, include:

General ranch and operation information

1. Operation identification (AW) number,
2. List of activities and any other changes implemented to capture the amount of nitrogen discharged to carry on the alternative monitoring methodology (changes in the irrigation system type or irrigation components, installation of

⁵ Agricultural Order, Page 28, Number 24

https://www.waterboards.ca.gov/centralcoast/water_issues/programs/ilp/docs/ag_order4/2021/ao4_order.pdf

- features and equipment to capture the irrigation water leaving, draining from the ranch),
3. Ranch identification (AGL) number(s),
 4. Ranch name,
 5. Ranch address, and
 6. Ranch assessor parcel number(s).

Supporting Documentation

7. Supporting documentation that quantifies the ranch-specific information and rationale for the direct monitoring discharge exemption request, at a minimum must include type of farming operation, such as greenhouse or nursery,
8. Number of crops produced or shipped annually for the entire area, and/or per greenhouse or nursery square footage,
9. Fertilization scheme (fertigation or in pot application of dry fertilizer), discharge points, and any other relevant information in support of the “Direct Monitoring Discharge” exemption request,
10. Description of the irrigation and drainage system components, irrigation performance and management, including layouts of both the irrigation and the drainage system components, and
11. Map(s), graph(s), layout(s), and/or picture(s) identifying and describing:
 - i. All water conveyances and water management features, a description of how the equipment will be installed, managed, and properly maintained to monitor the volume and nitrogen concentration of the discharges, and
 - ii. Detailed information of drainage structures and how the water will be conveyed or redirected towards the discharge areas and monitoring locations (the volume of irrigation water draining below ground, or underground draining pipes/systems must also be monitored),
 - iii. Specifications related to the presence of shallow groundwater, if any.
12. Explanation of the percentage of the discharge to be captured for monitoring.
13. Identification of formulas proposed to convert the measured nitrogen concentrations from mg/L per unit of volume into pounds of nitrogen discharged per year for each acre of the ranch.
14. All the equations and formulas used to calculate the annual total pounds of nitrogen discharged from the ranch (pounds per ranch acre).

Annual confirmation information

15. Total pounds of nitrogen discharged from the entire ranch in pounds (lbs),
16. Average pounds of nitrogen discharged per ranch acre (lbs./ranch-acre), and
17. Confirmation that the implemented alternative monitoring methodology continues to be sufficient to monitor the nitrogen discharged from the ranch.

All Exemptions Approval Process

Follow this process to request and obtain approval of one or more exemptions:

1. The individual grower, or the certifying or third-party agency, submits a technical report to the Central Coast Water Board Executive Officer (EO), for each individual ranch seeking an exemption. The technical report request is submitted in an email to AgNOI@waterboards.ca.gov. The technical report must clearly state for which of the three (3) exemptions is requesting approval (condition 22, 23, or 24, and include the minimum required information described in the previous pages of this document.
2. Technical reports submitted by an approved certifying or third-party agency, must also provide a list of all the approved certification program auditing activities, such as inspections and/or review of documentation of each individual ranch, verification of the applicability of each individual ranch (as identified in the GeoTracker ranch eNOI) to receive the exemption requested.
3. The EO reviews the technical report request and either approves or denies the exemption.

Annual Update Confirmation Report

1. To maintain the exemption status for future years, the Annual Update Confirmation Report must be submitted annually by January 31 to AgNOI@waterboards.ca.gov. The Annual Update Confirmation Report must include the results of the certifying or third-party agency certification program auditing activities, any relevant ranch specific information, and records necessary to confirm the approved exemption is still applicable.
2. The EO will review the Annual Update Confirmation Reports received by the January 31 deadline and will either confirm or revoke the ranch exemption status.
3. Ranches with a revoked exemption, or those who did not submit the Annual Update Confirmation Report by January 31, are required to submit the entire INMP Summary Report by the next March 1 reporting deadline.

How to Submit the Technical Report?

Attach the technical report to an email and send to AgNOI@waterboards.ca.gov.

The technical report must be submitted for approval by January 25, after the year when the ranch is required to begin reporting the INMP Summary Report. For example, a grower seeking approval of an exemption for a ranch located in Groundwater phase area 2, required to submit the INMP Summary Report by March 1, 2026 (for the reporting period that extends from January 1 to December 31 of 2025) must submit the technical report by January 25, 2026.

What if I still have questions?

If you have any questions, you can contact Irrigated Lands Program staff by phone (805) 549-3148 or email AgNOI@waterboards.ca.gov.