Challenges of Complying With INMP Reporting Requirements for Greenhouse Growers on the Central Coast

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UNIVERSITY OF CALIFORNIA Agriculture and Natural Resources

Asian Specialty Vegetable Production

County	No of Asian Farmers	Acres Harvested	Value of Asian Vegetable Production
Fresno*	1,499	950	\$15,975,000
Santa Clara*	277	503	\$6,981,000
San Bernardino	157	1716	\$16,471,184
Monterey	128	963	\$17,378,000
San Luis Obispo	118	267	\$2,161,000
Riverside	368	2627	\$19,866,000
Ventura	255	755	\$15,006,000
Total	2802	7781	\$93,838,184

* Limited-resource, small-scale, socially disadvantaged Chinese, Hmong, and other Asian immigrant farmers.
2023 Santa Clara County Crop Report: Value \$10,274,000 on 678 acres

Asian Farms Information

	Fresno	Santa Clara
Total no. of farms	1036	277
Median size of farms (acres)	8.8	4
No of farms <10 acres	141 (14%)	140 (68%)
No of farms <\$50,000 in sales	445 (43%)	137 (67%)

Farming Practices: Production Systems

Greenhouse Production



Open Field Production



Farming Practices: Irrigation Systems

Overhead Irrigation

Senninger Super Spray





Farming Practices: Nutrient Management



Farming Practices: Marketing

Direct Marketing



Wholesale Marketing



Challenges of Complying With INMP Reporting Requirements

- 1. Highly diverse crop systems
- 2. High variability within a crop type
- 3. Small scale operations
- 4. Language barriers
- 5. Gaps in research

UCCE outreach and technical assistance UCCE INMP related research

1. Different Types of Cut Flowers

Chrysanthemum, statice, snapdragon, safflower, etc.







Ong Choy



Malabar Spinach





Purslane

Mint

Perilla



Tatsoi



Yu Choy Sum



Pea Tips



Chayote Shoots



Garlic Greens



Asiatic Pennywort



Bitter Melon



Asian Cucumber



Asian Cauliflower



Winter Melon



Asian Basil





Bok Choy



Edible Chrysanthemum



Garlic Chives





Amaranth



Chinese Celery

A Choy

1. Variability in Length of Growing Season

45-60 days duration crops (1 harvest)
Bok choy
Baby bok choy
A choy (celtuce)
Gai choy
Yu choy
Gailan
2-4 months duration crops (1-2 harvest)
Amaranth
Daikon radish
Garlic
Chinese celery
Edible chrysanthemum
4-9 months duration crops (multiple harvests)
Malabar spinach
Yam leaves
Ong choy
Pea tips
3-4 year duration (multiple harvests)
Garlic chives

2. High Variability Within a Crop Type – Different Types of Bok Choy



Taiwan bok choy

Shanghai bok choy

Bok choy

2. High Variability Within a Crop Type – Different Types of Bok Choy





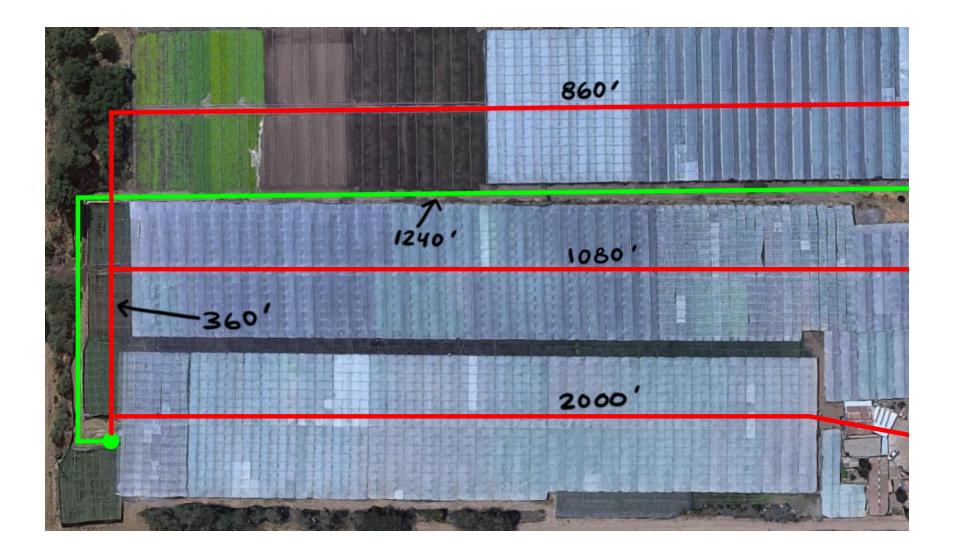


Tall Type Big Choi Medium Type New Nabai Dwarf Type Hotau Improved

3. Small-scale Farms



3. Small-scale Farms 20 Acre Asian Leafy Vegetable Farm



3. Small-scale Farms 20 Acre Asian Leafy Vegetable Farm



3. Small-scale Farms with ~2000 sq ft Blocks



3. Small-scale Farms with ~2000 sq ft Blocks



3. Small-scale Farms where Entire Family is Involved in Farming – Lack of Capacity and Technical Expertise



4. Language Barriers – Monolingual Spanish, Chinese, Vietnamese, and other Asian Grower Communities

NAME OF OPERATOR	OPERATION NAME	NOTES				
An Yang Chen	An Yang Chen Nursery					
Bob Kuang	Bob Kuang Nursery	SPEAKS ENGLISH				
Cai Zhang - 1	Zhang's Farm Inc.	1 of 2 active ranches SPEAKS ENGLISH				
Cai Zhang - 2	Zhang's Farm Inc.	2 of 2 active ranches. Ted Zhang, Cai's brother, grows on the property. SPEAKS ENGLISH				
Chengjiu Li	Chengjiu Li					
Han Qiang Kuang	Han Qiang Kuang Nursery	needs to sign auth. RP form				
Hao Qin Chen - 1	Hao Qin Farm	1 of 2 active ranches				
Hao Qin Chen - 2	Hao Qin Farm	2 of 2 active ranches. Yuan Ming Chen, Hao Qin's son, grows				
Hung Quoc Nguyen	N & L Farm Inc.					
Jason Phan - 1	South Pacific Orchids Inc.	SPEAKS ENGLISH, needs auth. RP form for each operation				
Jason Phan - 2	South Pacific Orchids Inc.	SPEAKS ENGLISH				
Jian Guang Liang/Xiao Teng Kuang	Jian Guang Liang Nursery	needs to sign auth. RP form				
Jianbin Guo	Golden Fields Produce					
Joe Chen - 1	Joe Chen Nursery	1 of 2 active ranches, SPEAKS ENGLISH				
Joe Chen - 2	Joe Chen Nursery	2 of 2 active ranches, SPEAKS ENGLISH				
Julie Lee	A & M Farm	SPEAKS ENGLISH				
Kawa Vong	Vong farms LLC	SPEAKS ENGLISH				
Keith Lo	Keith Lo Nursery	SFEAKS ENGLISH				
Kentin Lo	Refer to Nursery					
Mei Huan Huang	S & M Farms LLC	Shares well with Sonny Lo				
Peter Chak	Peter Chak Nursery	SPEAKS ENGLISH				
Ping Huang Cheng	Ping Huang Cheng Nursery	SPEAKS ENGLISH				
Qiaohua Xie	FOUR SEASON FARM					
Qing Qiang Zhen	Qing Qiang Zhen Farm					
Rui Kuang	Rui Kuang Farm					
Ryan Cho/Sandra Fang	VG Farms	SPEAKS ENGLISH				
Shun Heung Kwong	Shun Heung Kwong Nursery					
Shun Yu Kuang	Shun Yu Kuang Nursery					
Sik Kwan Kwong	Kwong Nursery					
Sonny Lo	Sonny Lo Nursery	Shares well with Mei Huan Huang				
Sung Wook Lee	Janong USA	SPEAKS ENGLISH				
Tian Kai Kuang/Yin Ying Mai	TKai Farm					
Tony Wong/Mibau Wong	T&L flowers	Also under Mibau Wong. SPEAKS ENGLISH				
Venh Tang	Tangs Farm	needs auth RP form under Kwong Samuel name				
Wendy chan	WY Chan Nursery	SPEAKS ENGLISH				
Xingguo Wang (George)	C & C Farm LLC					
Xu Hong Huang	Xu Hong Huang					
Yip Hing (Alan) Kwong	Kwong Nursery					
hou Ping Cai Zhou Ping Cai						
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4. Language Barriers – Monolingual Spanish, Chinese, Vietnamese, and other Asian Grower Communities

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Water Boards	Year Gamida Revealed The Control Contr
California Regional Water Quality Co	Ontrol Reard Control Coast Perion
Esta carta es un aviso de infracción de la Orden Agrícola y REQUIERE UNA ACCIÓN INMEDIATA. La falta de respuesta puede resultar en una multa de hasta \$1,000 por cada día que perdure la Infracción. Para obtener ayuda en españo	行动。如果不回应,则可能会对违规行为每 天处以最高1,000美元的罚款。如需中文帮 时、博致电(2016)341-5893
llame al: (916) 341-5893.	
ecember 30, 2022	
	and the second
ear Operator:	
NFORCEMENT PROGRAM: NOTICE O	F VIOLATION FOR FAILING TO SUBMIT A Y TRENDS WORK PLAN
ne California Regional Water Quality Con	trol Board, Central Coast Region (Central
aters of the state, including surface water	gency responsible for protecting the quality of and groundwater, within its jurisdictional
nds to comply with the terms and conditions scharges from irrigated lands do not cause	ires operators and landowners of irrigated ons of the <u>Aaricultural Order</u> 's of that waste so or contribute to pollution of waters of the jed Agricultural Order violation and explains
e potential monetary penalties for non-co	impliance with the alleged violation.

1 The General Waste Discharge Requirements for Discharges from Irrigated Lands Order No. R3-2021-0040 (Agricultural Order) is available at

0040 (Agriculture on of) is an electronic operation of the second operation ope

JANE GRAY, CHAIR | MATTHEW T. KEELING, EXECUTIVE OFFICER

895 Aerovista Place, Suite 101, Sen Luis Obispo, CA 93401 | www.wstarbbards.ca.gov/centralceast

Alleged Violation

Based on Central Coast Water Board records to date, the above listed operator is allegedly in violation of Agricultural Order Monitoring and Reporting Program section E.4 for failing to submit a Surface Receiving Water Quality Trends Work Plan by July 1, 2022.

1.

December 30, 2022

Who Must Submit a Surface Receiving Water Quality Trends Work Plan

The Agricultural Order requires that all dischargers enrolled in the Agricultural Order submit a Surface Receiving Water Quality Trends Work Plan either individually or through a third-party program that has been approved by the Central Coast Water Board's Executive Officer. Central Coast Water Quality Preservation, Inc. (Preservation, Inc.) is currently the only approved third-party program in the central coast region that can submit a Surface Receiving Water Quality Trends Work Plan on behalf of its members to comply with this requirement. According to information provided by Preservation, Inc. to the Central Coast Water Board, the above listed operator is not a member of Preservation, Inc. and therefore, the above listed operator is required to submit an individual Surface Receiving Water Quality Trends Work Plan for their operation.2

To learn more about Preservation, Inc.'s services, membership, and fees, please visit www.ccwqp.org or contact their support line at support@ccwqp.org or (831-240-9533).

How to Update or Correct Inaccurate Information

Within 21 days of receiving this letter, notify Central Coast Water Board Irrigated Lands Program staff via email at AgNOI@waterboards.ca.gov or via phone at (805) 549-3148 of any of the following:

- The Surface Receiving Water Quality Trends Work Plan has been submitted.
- The operator contact information included in this letter is incorrect.³
- Justification why a Surface Receiving Water Quality Trends Work Plan is not applicable or required for the above listed operation.

In your electronic mail correspondence please include the following subject heading: Surface Receiving Water Quality Trends Work Plan - [insert AW number]. If the Central Coast Water Board does not receive evidence that the Surface Receiving Water Quality Trends Work Plan was submitted or not required or that the contact information is incorrect, the Central Coast Water Board staff will assume that the violation cited and contact information included in this notice of violation are accurate

How to Resolve the Alleged Violation

Immediately become a member of Preservation, Inc. or submit a complete individual Surface Receiving Water Quality Trends Work Plan for the above listed operation via

² In most cases individual growers will incur greater costs to conduct individual surface receiving water quality trends monitoring and reporting, than growers that are members of Preservation, Inc.











Irrigation and Nutrient Management Plan (INMP) EZ Form

Preservation, Inc.

Please populate this form as completely as possible. You can answer questions and return later with the answers populated. Once you Submit your answers, though, you must contact Preservation, Inc. to make changes.

This form allows you to enter up to 5 parcel numbers (APNs), 5 crops, and 3 organic fertilizer applications per crop, but you cannot enter compost or other materials to improve soil properties and/or nitrogen removal through cover crop scavenging or by treatment methods. If you want the soil amendment/other materials credit or if you have more APNs, and/or crops to report, please use the Preservation, Inc. MS Excel INMP Template available on the <u>CCWQP INMP</u> page.

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10	GLOBAL_ID (AGL0200#####)			Values to Report	#DIV/0!	#DIV/0!						
11	RanchID or Ranch Name											
12	Crop											
13	Date	Acres Fertilized	Fertilizer Name	Type of Fertilizer	Liquid or Solid	N from Fertilizer N-P- K	Liquid Fertilizer Density (pound/ gallon)	Total Amount of Fertilizer Applied (pounds for Solid or gallons for Liquid)	%N	Lbs of N Applied per Crop Acre	Total Lbs of N Applied	
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TOOLS	ZHOU PING CAI							
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✓ Check EDD	RANCH / FARM NAME	ADDRESS	CITY	IRRIGATED ACRES	TAILWATER ACRES	RANCH / FARM TIER		
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UCCE Research Efforts: Asian Leafy Vegetables Nitrogen Crop Coefficients

Commodity	Product	Pack Type	# fields sampled	mean %DM	min %DM	max %DM	mean %N	min %N	max %N	mean coeff	min coeff	max coeff
Bok Choy, baby	Fresh Market	Carton	15	3.57	1.88	5.33	5.73	4.24	6.58	0.00209	0.00085	0.00344
Bok Choy, Full siz	e Fresh Market	Carton	12	4.75	3.90	5.39	3.78	2.76	4.36	0.00178	0.00148	0.00188
Celery	Fresh Market	Carton	16	4.99	3.57	6.64	2.19	0.99	3.03	0.00106	0.00052	0.00144
Chinese Celery	Fresh Market	Carton	15	7.12	6.16	8.59	4.24	2.48	5.65	0.00301	0.00161	0.00418
Gai Choy	Fresh Market	c Carton	15	6.34	5.15	8.37	5.66	4.81	6.25	0.00360	0.00294	0.00523
Napa Cabbage	Fresh Market	Carton	12	5.00	4.49	5.90	3.67	2.51	4.73	0.00181	0.00148	0.00212
Tong Ho	Fresh Market	c Carton	15	6.94	5.50	9.26	4.97	3.53	6.46	0.00344	0.00194	0.00553
Yam Leaves	Fresh Market	c Carton	15	10.35	8.75	13.37	4.98	3.15	5.79	0.00510	0.00353	0.00607



UCCE Research Efforts: Asian Leafy Vegetables Nitrogen Crop Coefficients

Commodity	Product	Pack Type	# fields sampled	mean %DM	min %DM max %DM mean %N	max %N	mean coeff	min coeff	max coeff
Malabar Spinach									
A choy (celtuce)									
Pea tips									
Gailan									
Yu choy									
Ong choy									
Chayote tips									
Amaranth									



Thank You Any Questions?



CALIFORNIA DEPARTMENT OF FOOD & AGRICULTURE



Natural Resources Conservation Service

SNRC