
Dischargers in Priority 1 groundwater subbasins (Kaweah, Chowchilla, Modesto, Turlock, Kings, Tule) develop Preliminary Management Zone Proposals within 270 days (9 months) of Notice to Comply. The purpose of developing Preliminary Management Zone Proposals is to provide all dischargers within a specified priority area where a management zone is in development with enough information to make an election for complying with the Nitrate Control Program via Pathway A or Pathway B. Dischargers elect Pathway A or B within 330 days (11 months) of Notice to Comply.

Step 1 - Dischargers submit Notice of Intent (NOI) which includes:
- Initial assessment of discharge to shallow zone
- Submittal of Early Action Plan (EAP) (if applicable)
- Discharge categorization
- Submittal of Alternative Compliance Project (ACP), if required.

Step 2 - Implement Early Action Plan if included in NOI. Begin implementation of EAP within 60 days after submittal unless a letter of objection is provided to the discharger by the Central Valley Water Board within that 60-day period. If no EAP is necessary, dischargers go to Step 3.

Step 3 - Nitrate Control Program Compliance Determination and Revision of WDRs to incorporate Compliance Requirements (WDR revisions per Central Valley Water Board schedule)
- Category 1 or 2 - Generally comply through existing WDR requirements.
- Category 3 - Compliance may include additional monitoring/trend evaluation.
- Category 4 or 5 - To support an allocation of assimilative capacity or authorize an exception, the discharger will need to propose an Alternative Compliance Project (ACP)