

## RWB Staff and Stakeholder Comments to Draft Templates

Comment Number	Commentator	Template	Comment Detail	Comment Summary	ESJ Response / Action
1	RWB Staff	Overall	The supplemental information you provided was very helpful in explaining how you believe the templates comply with the requirements. However, a key piece of the template will be the instructions to the grower on how to fill out the template form. The instructions will be important to ensure the grower knows what is required; that the information being provided on the form is done in a consistent manner; and the information is of high quality. Your next submittal must include the instructions for filling out the form or provide the timeline for developing the instructions.	Instructions to growers for filling out the form needs to be included in next submittal.	Add Instructions.
2	RWB Staff	Overall	The templates are either used to convey information to the third-party or will serve as a plan that is kept on site and must be produced as described in the Order. The templates, therefore, must include the certification statement in section IX.3. of the Order. As part of the certification, a data field that indicates the date the template was completed and who completed it must also be included.	Templates must include date template was completed and who completed it.	Add certification field (IX.3 of the Order).
3	RWB Staff	Overall	Currently, it is not clear how the practices are going to be linked to a location. This linkage is especially critical where a grower has multiple parcels, potentially with multiple crops. Without linking the practices to a given crop and a given parcel (or field), it is not clear how the Coalition would be able to relate water quality monitoring results to practice implementation. The Order currently requires reporting from the third-party to the board on a township basis, however, the Coalition will need the practice information at a finer scale to conduct its analysis. Also, if requested, those data must be provided to the board as part of an inspection or upon written request from the Executive Officer. The templates must be modified to ensure the data collected can be associated with the appropriate location.	Practices need to be linked to crop and specific parcel location.	Database design will link answers by field to APN and member which can be associated with TRS.
4	RWB Staff	Overall	The templates appear to have different data fields for basic information that should be common for a given farm. To save the grower time in entering such information multiple times and to avoid possible misunderstanding, the templates should have certain basic information / data fields in common. The Farm Evaluation has name (it is not clear whose name); Coalition Member ID#; parcels; and total acres. The Nitrogen Management Plan adds Field # and has a data field called "Owner/manager". The Sediment and Erosion Control Plan has more specific information including, both the name of the owner and operator, as well as address and contact information, but does not include the Member ID number. The templates should be modified to have common information in each of the templates regarding the farm.	Standardize basic information across all forms; such as Title and Name, Member ID, Parcels and Total Acres.	Standardize basic information across all forms; such as Title and Name, Member ID, Parcels and Total Acres.
5	RWB Staff	Overall	The Coalition and cooperating agricultural groups have provided hard-copy versions of the templates. Any electronic version of the templates must be consistent with the hard-copy version approved by the Executive Officer. Board staff strongly encourage the Coalition to develop electronic templates, and, to the extent feasible, eliminate the need for a grower to submit hard-copy reports to the Coalition. Such electronic templates will greatly reduce the need to enter the same information multiple times for each template and will greatly reduce the time and cost for growers to update their information. Although there may be many growers who do not have the technical capacity to complete electronic templates, the agricultural community has a significant infrastructure to assist those growers. As part of the template submittal, or soon thereafter, the Coalition should describe its general plans for providing the necessary technical support for growers to efficiently complete the templates. We would also like to discuss how the Board and other state and local agencies can help provide such support.	Provide electronic version of the templates and assistance for growers to complete the templates. Submit general plans to RWB for providing technical support to growers.	Develop plan for electronic submittal and supply information to RB with next submittal.
6	Paramount Farming Company	Overall	The success of the ILRP hinges on the ability to identify, track, record and analyze current practice and site condition contributions, if any, of discharges of waste to surface water and groundwater. To be effective and to avoid burdening growers with costly reporting efforts, all data needed to assess discharges of waste, if any, from current practices must be identified and collected in a uniform manner.	Data should be collected and identified in a uniform manner.	Agree.
7	Paramount Farming Company	Overall	We feel additional scientific and expert analysis to support the program requirements and identify the data needed to determine the contribution, if any, of current practices is necessary. The SWRCB and the CDFA agree and have convened expert panels to analyze key aspects of the ILRP and provide recommendations to be applied statewide...The timeline for approval of the Draft templates by the Executive Officer, as well as any actions to adopt the Orders by the Regional Board should be similarly postponed until the recommendations of the panels can be addressed it is premature for the Board to continue a timeline for implementation that does not incorporate the panel processes.	Wait for expert panel analysis prior to implementing template timelines.	Noted.
8	Paramount Farming Company	Overall	Grower compliance should provide the needed data in the least burdensome manner possible recognizing that many growers will be in several Coalitions and would benefit from a universal reporting system.	Universal reporting system across all Coalition Groups.	Agree.

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9	John Zentner	Overall	Assemble some real growers who represent the majority of commodities grown in the central valley in a room and start over.	Have a grower panel representative of major crops analyze templates.	Cannot start over; commodity groups were involved in the development of the templates.
10	John Zentner	Overall	The templates as written will add thousands of hours of time for the growers to complete, more thousands of hours by administrators to compile and will not result in the goal of protecting water quality. The decision tree format used by the USDA for the annual agricultural census would be more familiar to growers and could be used to easily identify where management practices need to be increased.	Use annual ag census decision tree format familiar to growers.	Review the Census webpage and surveys to see what can be implemented in the webpage design and survey template (e.g. the FAQ page has good examples of questions).
11	John Zentner	Overall	There should be three choice for answers: USED, NOT APPLICABLE (or APPROPRIATE), NOT USED. It is important to identify practices that could be used and aren't so that if the practices that are in place are inadequate you have a list of additional practices that may be able to help protect the receiving water.	Have the following options for answers: 1-Used 2-Not Used 3-Not Applicable	This may work for some questions but not all; will be incorporated into the design of the questions. Not Applicable is important to include as well as a place to make notes.
12	Grassland Water District	Overall	In addition to providing habitat for migratory waterfowl and other wetland-dependent animals and plants, wetlands provide significant ecological benefits, such as recharging aquifers, absorbing and storing floodwaters, reducing erosion, and improving water quality. <sup>3</sup> Unlike irrigated croplands, the owners of managed wetlands do not apply pesticides, herbicides, or fertilizer to the land. Accordingly, management of these wetlands through seasonal flooding to mimic natural processes does not contribute pollutants that increase the toxicity, turbidity, or nutrient content of surface and groundwater.	Managed wetlands do not contribute farm-related pollution.	Not applicable to ESJWQC.
13	El Dorado County Farm Bureau	Overall	The templates are confusing and include redundancies. This unfairly adds additional effort on the part of the farmers and the coalitions, whose costs are borne by the growers. There is no alternative for subwatersheds where monitoring is infeasible due to hydrology.	Provide alternative for subwatersheds where monitoring is infeasible.	Online system and database design will be developed to reduce as much redundancy for the grower as possible.
14	El Dorado Agricultural Water Quality Management Corp	Overall	The templates are, in general, confusing, incomplete and the data requested does not appear useful.	Reformat templates. Data does not appear to be useful.	Not applicable to ESJWQC.
15	El Dorado Agricultural Water Quality Management Corp	Overall	There are redundancies between the various forms in terms of parcel, cropping and member information that require duplicative effort. This imposes a burden on the farmers who must complete the forms and the coalitions that must monitor for completeness.	Remove/reduce redundant fields across forms.	Online system and database design will be developed to reduce as much redundancy for the grower as possible.
16	El Dorado Agricultural Water Quality Management Corp	Overall	There is no appeal process for subwatersheds where monitoring is infeasible due to hydrologic conditions. A low threat option needs to recognize those areas that present no risk to groundwater due to the lack of defined basins.	Provide alternative for subwatersheds where monitoring is infeasible.	Not applicable to ESJWQC.
17	City of Sacramento Department of Utilities	Overall	In agreement with RWB Staff Comments	Agree with RWB comments.	Comment noted.
18	City of Sacramento Department of Utilities	Overall	Suggest the instructions should provide clarification on what would trigger an update to the Farm Evaluation or the SECP by the grower.	Provide info on what triggers a need for an updated form from grower.	Include in Instructions or FAQs when an update to the Farm Evaluation is triggered.
19	City of Sacramento Department of Utilities	Overall	Templates are not annually updated, so not certain of how a grower would report any deviations from the management practices outlined in the templates to the Coalition for consideration in assessing impacts for Annual Reports.	How will growers report deviations from template practices?	There will be options for growers to add comments on the template if there is no suitable answer or to add clarification to Not Applicable answers.
20	California Farm Bureau Federation	Overall	Farm Bureau respectfully requests that the templates allow for flexibility and variability so that coalitions can appropriately tailor the templates depending on the geographic area, elevation, existence of groundwater basins or sub-basins, soil content, presence of fractured rock, types of commodities grown, known water quality impairments, the propensity to impact water quality, and the size and scale of farming operations, for example. Such tailoring will allow the Regional Board to obtain the most relevant information specific to the area being regulated while also allowing growers to minimize costs and maximize benefits.	Allow for variations of templates dependent on geographic and farm types.	Not applicable to ESJWQC.
21	RWB Staff	Farm Evaluation	In Part A, the Farm Evaluation template appears to identify all parcels associated with a Member, although Part B appears to be crop specific. The parcels and associated crops will need to be linked. The Nitrogen Management Plan includes a "Field #" data field, yet the Farm Evaluation does not. There should be consistency between the templates.	Link parcels to crop and be consistent with Nitrogen template add "Field #".	Database design will link answers by field to APN and member which can be associated with TRS.

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22	RWB Staff	Farm Evaluation	The Farm Evaluation could be used to help educate the grower on whether their parcel is in a high vulnerability area and for what constituents. Board staff recommend including data fields for whether the parcel is associated with a high vulnerability area and for what constituent. We realize the Coalition can provide this analysis, however, the addition of these data fields could raise the grower's awareness of water quality issues related to the area where their operation is located.	Include parcel vulnerability data.	The ESJWQC will evaluate supplementing the template with additional information for members including surface and groundwater vulnerability (if applicable).
23	RWB Staff	Farm Evaluation	For the wellhead practices section, it is unclear whether the answers to the questions imply that the practice applies to all wells or just some of the wells. The format of the questionnaire must be changed to clarify whether wellhead protection practices apply to all wells or a subset of the wells. Board staff suggest a table, with well numbers keyed to the Farm Map, that would be used to indicate the wellhead protection practices that apply to each well.	Reformat wellhead practices to be clear if practices apply to all wells. Suggestion: Table w/ well numbers key to farm map.	ESJWQC will consider in database design that wellhead practices may need to be identified per group of wells and offer instructions on keying the well to a map if there are different practices. It is not anticipated that this will occur often.
23	<i>Proposed Change</i>	Add New Page for Well Info			Instruction to fill out well information sheet including how to indicate on the map groups of wells associated with practices. Q1: Do you have any wells on your property? Q2: Are you aware of any abandoned wells on your property? Q3: For abandoned wells, what was the method of abandonment? Q4: Well management practices (check all that apply)
24	RWB Staff	Farm Evaluation	In addition to asking whether there are abandoned wells on the property, the template should include questions regarding how those wells were abandoned, if known. If the wells were not properly closed, there is a potential direct discharge pathway to groundwater from the land surface. Board staff suggest a table, with well numbers keyed to the Farm Map, that would be used to indicate the closure method used for each well.	Ask how abandoned wells were abandoned. Suggestion: Table w/ well numbers key to farm map.	Consider in database design that abandoned wells may need additional information including how the wells were abandoned and when (idea of keying the well to a map).
25	RWB Staff	Farm Evaluation	The template appropriately includes a question regarding the discharge of sediment. Either in Part A or Part B, the template must also allow the grower to report on their sediment and erosion control practices, if such practices are necessary.	Grower must report sediment and erosion control practices, if necessary.	Add question about if the member has a Sediment and Erosion Control Plan.
25	<i>Proposed Change</i>	Add Question			Do you have a Sediment and Erosion Control Plan?
26	RWB Staff	Farm Evaluation	In Part B, please clarify why the "represented crop acreage" field is provided, since Part A presumably identifies the parcels and acreage to which the Farm Evaluation applies.	Define "Represented Crop Acreage" field in Part B.	Automatically filled in based off of ESJWQC membership database (parcel, crop and acreage).
27	RWB Staff	Farm Evaluation	Under Irrigation Practices ("Water application scheduled to meet need") and Nitrogen Management Methods ("Minimize leaching") there are similar check boxes that should be expanded. If there are other methods of minimizing leaching besides through optimizing irrigation water management, those methods should be identified. The specific methods for how water application would be scheduled to meet need should be identified.	Identify more methods of minimizing leaching and specific methods for how water application would be scheduled to meet need.	Updated Q5 in Part B to be 2 different categories: 1) Practices to minimize surface runoff & 2) Practices to improve irrigation efficiency. Added the following options to Practices to improve irrigation efficiency: 1) Use of E <sub>r</sub> in scheduling irrigation 2) Use of soil moisture probe (e.g. tensiometer or irrometer) Updated Q6 to say "Nitrogen Management Methods to Minimize Leaching" and removed Minimize Leaching as an option since all of the practices are designed to minimize leaching.

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27	Proposed Change	Add New Page for Well Info			<p>1. Irrigation Practices:  a. Drip, b. Furrow, c. Overhead, d. Sprinkler, e. Micro Sprinkler</p> <p>2. Practices to Improve Irrigation Efficiency  a. Laser Leveling, b. Water application scheduled as needed, c. Use of ET in scheduling irrigation, d. Use moisture probe (e.g. irrometer)</p> <p>3. Practices to Minimize Surface Runoff  a. Border strip, b. Tailwater Return,</p> <p>4. Nitrogen Management Methods to Minimize Leaching  a. Cover crops, b. Split applications, c. Soil testing, d. Tissues testing, e. Variable rate/GPs, f. Crop advisors, g. Folier N application, h. Management planning, i. Water testing, j. Fertigation</p>
28	RWB Staff	Farm Evaluation	The Farm Map (Part C) will be a valuable tool for the growers to simply convey important information regarding their farm. The Farm Map should also identify the downstream water body that receives the discharge from the farm once it leaves the property. The template instructions indicate that the Farm Map would be kept on-site due to concerns about the locations of wells potentially being made public. The Order currently does not allow the grower to exclude any portion of the Farm Evaluation it submits to the third-party. The monitoring and reporting program or the waste discharge requirements would have to be modified to meet the stated intent to keep the Farm Map on-site.	include downstream water body on farm map. Map will not be excluded from public reporting-Monitoring & Reporting program or WDR would need to be modified to exclude map.	Map will be prepopulated with land marks such as waterbodies and roads to assist the grower. Map <b>CANNOT</b> be excluded from the submittal of the Farm Evaluation.
29	John Zentner	Farm Evaluation	Question 2 - Acreage (is it parcel size or ag operation size)	Define Q.2. Acres - full APN or farmed.	Define Q.2. Acres - full APN or farmed.
30	John Zentner	Farm Evaluation	Question 3 - Shouldn't you identify irrigation water source before discussing wellhead practices (if you have no wells these will all be left blank and that will skew statistics)	Identify irrigation water source before wellhead section.	Identify irrigation water source before wellhead section. If there are no wells, the database will be populated with Not Applicable for wellhead practices (not blanks).
31	John Zentner	Farm Evaluation	Question 4 - If you check the first item then at least 4 others are redundant. If you don't check the first item you are violating the law.	County permit checkbox automatically implies other checkboxes true.	Omit County permit checkbox - automatically implies other checkboxes true.
32	John Zentner	Farm Evaluation	Question 6 - Define "background level"	Define Q.6. Background level.	Q.6 - omit "above background levels" since that is difficult to define and is waterbody specific.
33	John Zentner	Farm Evaluation	Part B-Missing crops: Christmas trees, Blue Berries among many others	Add more crops to Part B	Other allows for growers to add in any missed crops; can be adjusted over time based on common crop patterns. Potential to be filled in advance based on membership and APN information.
34	John Zentner	Farm Evaluation	Part C-Need to specify scale and accuracy of map.	Specify scale/accuracy of map	Noted.
35	Grassland Water District	Farm Evaluation	GWD requests that an attachment be added to the Farm Evaluation Template, entitled a "Managed Wetlands Exemption Form." Owners and managers of managed wetlands could submit the exemption form in lieu of the Farm Evaluation. By signing the exemption form with a certification statement, the owner or manager would certify that the property is only used for managed wetland purposes, that no pesticides or fertilizers have been applied in the last five years.	Provide exemption for managed wetlands.	A separate template should be developed that is specific to managed wetlands.
36	El Dorado County Farm Bureau	Farm Evaluation	The evaluation form does not request the source of farm water which may originate from a private well and or purveyor water to service the agricultural areas.	Ask source of farm water.	Add question about source of irrigation water.
37	El Dorado County Farm Bureau	Farm Evaluation	Does the form acreage request only refer to irrigated acres? The crop lists are incomplete as crops differ between the valley and the foothills.	Clarify if referring to irrigated acres. Add more crops to crop lists.	Noted.
38	El Dorado County Farm Bureau	Farm Evaluation	The farm map requires an indication of potential water discharge points for a program which is supposed to be a non-point source effort.	Do not require discharge points on farm map.	Required by Order to indicate discharge points.

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39	El Dorado Agricultural Water Quality Management Corp	Farm Evaluation	The evaluation form assumes that everyone is on a well and there is no other source of farm water.	Ask source of farm water.	Add question about source of irrigation water.
39	<i>Proposed Change</i>	Add Question			What is the source of your irrigation water? A. irrigation district B. groundwater C. Riparian rights (water directly from river/stream) D. Combination - irrigation district/groundwater E. Combination - Riparian rights/groundwater
40	El Dorado Agricultural Water Quality Management Corp	Farm Evaluation	Is the "total acreage" the acreage of the parcel(s) or only the irrigated acres?	Clarify if referring to irrigated acres. Add more crops to crop lists.	Be consistent in reference to acreage.
41	El Dorado Agricultural Water Quality Management Corp	Farm Evaluation	Please define the term "background levels" in terms of the potential to discharge sediment as it could differ from year to year.	Define background levels.	Q.6 - omit "above background levels" since that is difficult to define and is waterbody specific.
42	El Dorado Agricultural Water Quality Management Corp	Farm Evaluation	The farm crop lists are incomplete. Will the crop lists be able to be tailored by each of the coalitions for specific orders? Cropping varies from area to area in the valley and foothills.	Crop list is incomplete.	Other allows for growers to add in any missed crops; can be adjusted over time based on common crop patterns. Potential to be filled in advance based on membership and APN information.
43	El Dorado Agricultural Water Quality Management Corp	Farm Evaluation	The farm map requires an indication of potential water discharge points. Are these potential discharges of irrigation water, stormwater or both? Isn't this a non-point source program?	Do not require discharge points on farm map. If required, clarify if irrigation, storm or both.	Required by Order to indicate discharge points and referncing both irrigation and stormwater discharges.
44	City of Sacramento Department of Utilities	Farm Evaluation	Request that the city and county location of the farm be provided, this may assist in locating Assessor Parcel Numbers (APNs) more quickly if needed.	Ask city and county location of farm.	Member APN, crop and acreage will be pre populated based on enrolled acreage.
45	City of Sacramento Department of Utilities	Farm Evaluation	In part A, #4 - Pesticide Application Practices, we would suggest the use of the term "are used" instead of "apply" in the title to better characterize what practices are actually implemented.	Change Part A #4 to "are used" rather than "apply".	Change Part A #4 to "are used" rather than "apply".
46	City of Sacramento Department of Utilities	Farm Evaluation	In part A, #4 - Pesticide Application Practices, we believe there is opportunity to collect information that may better assist in assessing water quality issues if they should arise and relate management practices to water quality. We would suggest that this section should be completed more similar to the Part B, and may be best implemented by using a tabular format. We believe that the specific fields should be directly comparable to several key criteria, including acreage, crop grown, management practices (irrigation, pesticide application, and nitrogen application), discharge pint, and downstream waterbodies. The Water Board will only be able to evaluate pesticide monitoring data if the information provided links specific management practices with the application of the pesticide, the crop treated, and the discharge location.	Change Part A #4 to tabular format similar to Part B.	Standardize basic information across all forms; such as Title and Name, Member ID, Parcels and Total Acres. Give members an option of assigning a field unit to their survey based on enrolled parcel information (for those with more than one parcel or crop).
47	City of Sacramento Department of Utilities	Farm Evaluation	In part A, #4 - Pesticide Application Practices, we believe that there are additional practices, or more specific details of the practices, which are not listed here that would be helpful in assessing impacts, if they should occur. This would include things such as pesticide application method/procedure, implementation of "hold times", implementation of County specific practices from Department of Pesticide Regulation (DPR) or Agricultural Commissioners (e.g. buffers), and proximity of aerial spraying to surface water. Regional Board may consider if this information is appropriate to collect here or require its collection if there is an identified water quality impact.	Include additional practices or specific details of practices to Part A #4.	Additional information is collected on such practices when there is a water quality impact (see ESJWQC Management Plan and associated management practice surveys).
48	City of Sacramento Department of Utilities	Farm Evaluation	In part A, #6 - Discharge Sediment Potential appears to be a very general question that could be misunderstood. We recommend that the Coalition add significant information here to clarify methods to make this determination and that this includes fields, roads, stream crossings, and discharge points. We also believe that this section should specify which locations/APNs are impacted so that they can be included in the SECP.	Clarify methods to make determination of discharge sediment potential. Specify which locations are impacted.	A separate Sediment and Erosion Control Plan will be required of members with the potential to discharge sediment. The Plan will include more details such as where the sediment discharge/erosion may occur.

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49	City of Sacramento Department of Utilities	Farm Evaluation	In part C - Map should also show areas of Erosion Potential identified in Part A, Item #6. Since the map is critical for identifying and locating potential sources of impact to water quality, we support that this document should be submitted to the Regional Board and be made available to the public.	Show areas of erosion potential on map. Document should be submitted to RWB and made public.	Sediment and Erosion Control Plan is not required to be submitted; will be kept on farm and available for RB review.
50	RWB Staff	Sediment and Erosion Control Plan	The Order requires roads and stream crossings to also be evaluated. Practices associated with minimizing erosion and the discharge of sediment from roads and stream crossings should also be included.	Ask for practices minimizing erosion/sediment from roads and stream crossings.	Currently only two types of practices - Irrigation and Cultural. A third group of practices will be added that are specific to roads and stream crossings; need to determine those practices.
50	Proposed Change	Add Question			Practices to mitigate for road/stream crossings: a. b. c. d.
51	RWB Staff	Sediment and Erosion Control Plan	The template should help growers identify what locations may be subject to erosion or sediment discharge by providing a list of suggested areas to be evaluated.	Provide a list of suggested areas to evaluate for erosion or sediment discharge.	This will be included in the Sediment Discharge and Erosion Assessment Report - checklists and maps will be updated to be member specific and identify why they were given the checklist to fill out.
52	RWB Staff	Sediment and Erosion Control Plan	The template should include a table for the grower to fill out or some other method to associate the identified location or area subject to erosion/sediment discharge; the existing management practices being used, if any; the management practices that are planned for implementation, if applicable; and the timeline for implementation. With the current format proposed, it will be difficult to associate the practices identified in the plan with specific locations on the farm.	Use a table or method to easily associate location to practices/implementation timeline.	Include directions to members to indicate on the map where a practice is implemented/will be implemented. Add column in Checklist to mark if practice will be implemented in the following year. Number practices and have member use the numbers on the map.
53	RWB Staff	Sediment and Erosion Control Plan	The nitrogen management plan must be certified for high vulnerability areas and the sediment and erosion control plan must be certified. The templates must include a place in the form for the party certifying the plan to sign.	Signature block needed for certifying party.	Add certification field (IX.3 of the Order).
54	Grassland Water District	Sediment and Erosion Control Plan	The third Template, the Sediment and Erosion Control Plan, is a checklist of "irrigation practices" and "cultural practices" to minimize or eliminate the discharge of sediment. First, none of the listed irrigation practices apply to managed wetlands (drip irrigation, timing to reduce pesticide runoff, flow dissipaters, etc.). Second, the applicable listed cultural practices are already implemented in managed wetlands as a matter of course (vegetative buffers, holding ponds, native vegetation, minimum tillage, etc.). If the owner or manager of managed wetlands is permitted to file an exemption form in lieu of the Farm Evaluation, then he/she will not be required to complete the Sediment and Erosion Control Plan checklist, unless the third-party representative or the Executive Officer identifies a potential erosion problem. Once again, GWD therefore requests exemption from the Farm Evaluation.	The Sediment and Erosion Control Plan does not apply to managed wetlands.	Not applicable to ESJWQC.
55	El Dorado County Farm Bureau	Sediment and Erosion Control Plan	The management and control options for erosion are incomplete. The sediment and erosion control forms requires the farmer to identify areas of "potential discharge". The template requests information on locations subject to frequent water flow events. This is contrary to the coalition non-point source type of management program in previous orders.	Identifying areas of potential discharge is contrary to the Coalition non-point management program.	Noted.
56	El Dorado Agricultural Water Quality Management Corp	Sediment and Erosion Control Plan	The sediment and erosion control forms ask for information on acres with "potential discharge". Is this directed at irrigation runoff or stormwater runoff (discharges)?	Clarify whether potential discharge is referring to storm or irrigation runoff.	Potential discharge is both irrigation and storm runoff.
57	El Dorado Agricultural Water Quality Management Corp	Sediment and Erosion Control Plan	The template requests information on locations subject to frequent water flow events but does not define "frequent".	Define "frequent" water flow events.	Define "frequent" water flow events.

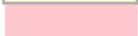
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58	El Dorado Agricultural Water Quality Management Corp	Sediment and Erosion Control Plan	The options for management of erosion are incomplete and will vary from area to area. Will coalitions be allowed to tailor these forms for specific orders?	Provide more options for mgmt. of erosion and tailor for different areas.	Add "Other" to each grouping of practices for member to fill in additional practices.
59	El Dorado Agricultural Water Quality Management Corp	Sediment and Erosion Control Plan	We support the ability for a member to include similar operations on one report instead of requiring redundant reports.	Allow one report for similar operations.	Noted.
60	City of Sacramento Department of Utilities	Sediment and Erosion Control Plan	Irrigation Practices Section: We suggest that there should be a specific practice listed to coordinate irrigation and rainfall prediction to prevent over-irrigation and runoff.	List specific practice to coordinate irrigation and rainfall.	No need to add; all growers already do this.
61	City of Sacramento Department of Utilities	Sediment and Erosion Control Plan	Irrigation Practices Section: We suggest that the item for lengthening time between pesticide application and irrigation should be expanded and/or clarified to include manufacturer/DPR/County Agricultural Commissioner requirements.	Include manufacturer /DPR/Ag Commissioner requirements for length of time between applications.	Already a law.
62	City of Sacramento Department of Utilities	Sediment and Erosion Control Plan	We suggest that another section be added for practices related to the non-agriculture sediment areas, such as roads and stream crossings.	Add section for practices relating to non-ag sediment areas.	Currently only two types of practices - Irrigation and Cultural. A third group of practices will be added that are specific to roads and stream crossings; need to determine those practices.
62	<i>Proposed Change</i>	Add Question			See Comment Number 50
63	City of Sacramento Department of Utilities	Sediment and Erosion Control Plan	The last page of the template includes two questions to give a narrative discussion on the impacted areas and the practices implemented. We suggest that a table would be a better fit here as well, perhaps referencing a map also.	Add a table, reference map, for the discussion on impacted areas and practices implemented.	Include directions to members to indicate on the map where a practice is implemented/will be implemented. Add column in Checklist to mark if practice will be implemented in the following year. Number practices and have member use the numbers on the map.

Color



Easy to add/clarify in template.



To discuss how to deal with comment and/or whether to make changes.



ESJWQC question update/addition based on Regional Board comments.

## Farm Evaluation – Survey Completion Instructions

The Farm Evaluation is a requirement of the Irrigated Lands Regulatory Program Waste Discharge Requirements (WDRs). Language below has been excerpted from the WDR.

This Farm Evaluation has been prepopulated with member APN/parcel information from Coalition records. If any of the information is incorrect, please indicate corrections on the survey.

Included with this Farm Evaluation is a map of your APNs/parcels enrolled with us; this map may be on multiple pages depending on the number and location of parcels. The survey responses should correspond to the parcels/fields identified on the map. You may subdivide a parcel into fields, assigning each field a name or number. The field name or number can correspond to site ID or location ID used for pesticide use reporting. For example, you might have two fields of different crops in one APN so they could be identified as APN# 111-00-222; field A; APN# 111-00-222, field B, etc. or any other field designation that fits your existing records.

Indicate on the first page which enrolled parcels and fields the survey applies to. If there are parcels/fields that have the same practices, only one survey needs to be filled out with the parcels/fields marked for which the survey answers apply.

If a parcel/field has different practices, fill out a separate survey for each parcel/field with unique practices. For example, if a member has 3 parcels enrolled (Parcel A, B and C) and manages Parcel A and B the same, fill out one survey for Parcels A and B. Another survey needs to be filled out for Parcel C if practices differ from A and B.

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### Language from ILRP WDRs:

“Members shall complete a Farm Evaluation and submit a copy of the completed Farm Evaluation to the third-party group according to the schedule below. The Member must use the Farm Evaluation Template approved by the Executive Officer (see section VIII.C below). A copy of the Farm Evaluation shall be maintained at the Member’s farming headquarters or primary place of business, and must be produced upon request by Central Valley Water Board staff.

[A]n updated Farm Evaluation must be prepared and submitted to the third-party . . . annually thereafter. As part of the Farm Evaluation, the Member shall provide information on any outreach events attended in accordance with section IV.B.4 of this Order. . . . [T]he Executive Officer may approve reduction in the frequency of updates and submission of Farm Evaluations, if the third-party demonstrates that year to year changes in Farm Evaluation updates are minimal and the Executive Officer concurs that the practices identified in the Farm Evaluations are consistent with practices that, when properly implemented, will achieve receiving water limitations or best practicable treatment or control, where applicable.”

## Farm Evaluation – Survey Completion Instructions (cont'd)

### Steps to Complete the Farm Evaluation (Part A, B and C):

**Step 1:** The Whole Farm Evaluation (Part A) list all the parcels (APNs) currently enrolled; acreage is enrolled acreage. For question 1, check the box next to all practices listed that apply to your enrolled parcels. Answer question 2 and 3 by circling either Yes, No, or N/A (Not Applicable). If Not Applicable is circled, add a comment explaining why the practice does not apply to your farm at the bottom of Part A.

**Step 2:** The Specific Field Evaluation (Part B) includes management practices that may apply only to some of the enrolled parcels. In question 1, identify which parcels the survey applies to by putting a check box on page 1 next to those parcel numbers. Use the attached farm map to help identify parcel numbers. Fill out a survey for each of your enrolled parcels (or combine if appropriate).

**Step 3:** Review the attached map of the parcels enrolled (those that were checked in Step 2) and make any necessary changes to the parcel or field boundaries. For example, a parcel may be enrolled but only some of the acreage is farmed by the member. If changes need to be made to a parcel or field boundary, mark-up the attached map and return a copy to the Coalition with your Farm Evaluation so the survey responses are linked to the correct piece of land. The map will stay with the Coalition and will not be available to the public.

**Step 4:** Answer questions 2 - 6 in Part B (Specific Field Evaluation) regarding practices implemented on the parcels indicated in Step 2.

**Step 5:** Answer questions 1 and 2 of Part C of the Farm Evaluation (Irrigation Well Information).

**Step 6:** Question 3 of Part C describes how to label the map to identify well(s) associated with this Farm Evaluation. Identify the location of both active and abandoned wells on the attached map. Create a well identification (Well ID) to link the well management practices to the well(s) marked on the map.

**Step 7:** Answer the questions in the well management practices table with an "X" for practices that are implemented. For abandoned wells, indicate the year that the well was abandoned and the method of abandonment. Mark on the parcel map (Farm Map Part D) the location of well(s).

**Step 8:** Sign the bottom of the Farm Evaluation (Part A) to certify that all of the information provided is current and accurate. Submit the signed Farm Evaluation and maps to the Coalition. Keep copies for your records.



# Specific Field Evaluation Management Practices - Part B

Member Name: [Pre Populated] \_\_\_\_\_ Coalition Member ID#: [Pre Populated] \_\_\_\_\_

Company Name: [Pre Populated] \_\_\_\_\_

1. Identify Parcels: Please check the parcels this survey applies to (reference the attached map(s) for assessor parcel number locations). *Pre Populated example below demonstrates what a survey would look like for an ESJWQC member*

Acres	Parcel (APN)	Crop	County	Field ID	Acres	Parcel (APN)	Crop	County	Field ID
<input type="checkbox"/> 162.00	042-050-003	Almonds	Merced	_____	<input type="checkbox"/> 120.00	140-020-003	Almonds	Merced	_____
<input type="checkbox"/> 322.26	042-050-009	Almonds	Merced	_____	<input type="checkbox"/> 233.60	042-140-005	Almonds	Merced	_____
<input type="checkbox"/> 203.15	019-041-042	Almonds	Stanislaus	_____	<input type="checkbox"/> 27.65	052-030-057	Almonds	Merced	_____
<input type="checkbox"/> 190.18	024-003-004	Almonds	Stanislaus	_____	<input type="checkbox"/> 21.99	052-030-039	Almonds	Merced	_____
<input type="checkbox"/> 418.94	024-003-006	Almonds	Stanislaus	_____	<input type="checkbox"/> 32.71	052-030-040	Almonds	Merced	_____

2. Irrigation Practices (check all that apply)

- Drip
- Micro Sprinkler
- Furrow
- Sprinkler
- Border strip

4. Practices to Improve Irrigation Efficiency (check all that apply)

- Laser Leveling
- Use of  $E_T$  in scheduling irrigations
- Water application scheduled to need
- Use of moisture probe (e.g. irrometer or tensiometer)
- Other \_\_\_\_\_

5. Practices to Minimize Surface Water Runoff (check all that apply)

- Border Filter Strip of Vegetation
- Tailwater Return System
- Other \_\_\_\_\_

6. Nitrogen Management Methods to Minimize Leaching (check all that apply)

- |  |   |
|--|---|
| <input type="checkbox"/> Cover Crops                   | <input type="checkbox"/> Supply Water Testing |
| <input type="checkbox"/> Split Fertilizer Applications | <input type="checkbox"/> Fertigation          |
| <input type="checkbox"/> Soil Testing                  | <input type="checkbox"/> Other _____          |
| <input type="checkbox"/> Tissue/Petiole Testing        | <input type="checkbox"/> Other _____          |
| <input type="checkbox"/> Variable Rate/GPS             |   |
| <input type="checkbox"/> Foliar N Application          |   |

# Farm Evaluation

## Irrigation Well Information - Part C

1. Do you have any wells on parcels associated with this Farm Evaluation? (circle one)    Yes    No
2. Are you aware of any abandoned wells on parcels associated with this Farm Evaluation? (circle one)    Yes    No
3. For abandoned wells, mark the location of these wells on the attached map(s) with a unique Well ID of your choice and fill in the following table. For each well, be sure to fill in the table with the Well ID that corresponds to the map and put an "X" next to the practices that apply to the individual well. If the well has been abandoned, indicate the year the well was abandoned (write "Unk" if the year is unknown; approximation is ok) and mark how the well was abandoned:

Well ID	If abandoned, year abandoned	Destroyed – certified by county	Destroyed by licensed professional	Destroyed - Unknown method	Backflow Preventer/ Check Valve	Wellhead Protection		
						Ground Sloped Away from Wellhead	Standing water avoided around wellhead	Good "Housekeeping" Practices*
<i>Example of Abandoned Well: A1</i>	2004	X						
<i>Example of Active Well: X1</i>					X	X	X	X

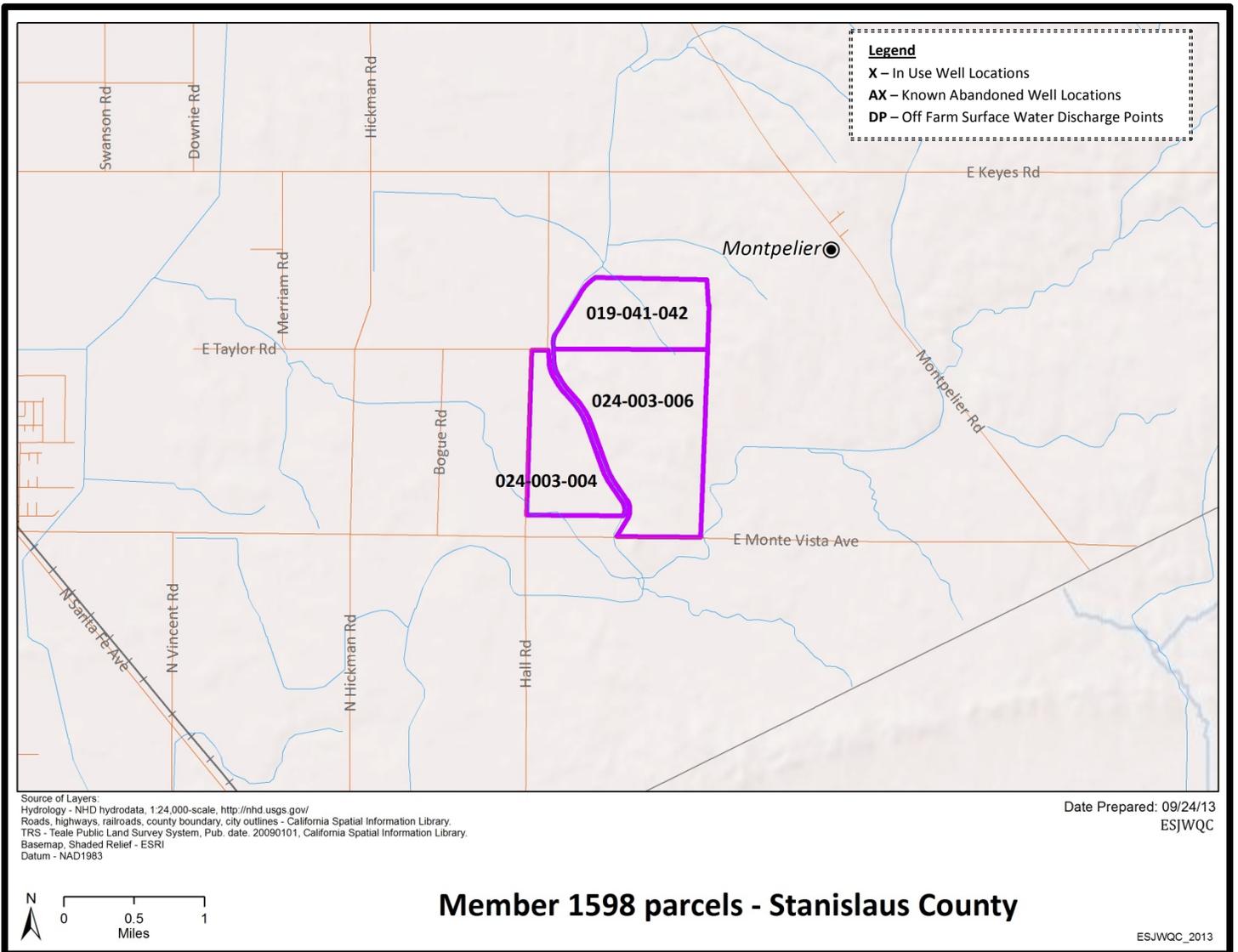
\*Good housekeeping practices include keeping the area surrounding the wellhead clean of trash, debris and any empty containers.

Comments: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

# Farm Evaluation Farm Map - Part C

(Farm Map – Keep Onsite- For Inspection Purposes Only)

Update map with well locations and surface water discharge points.

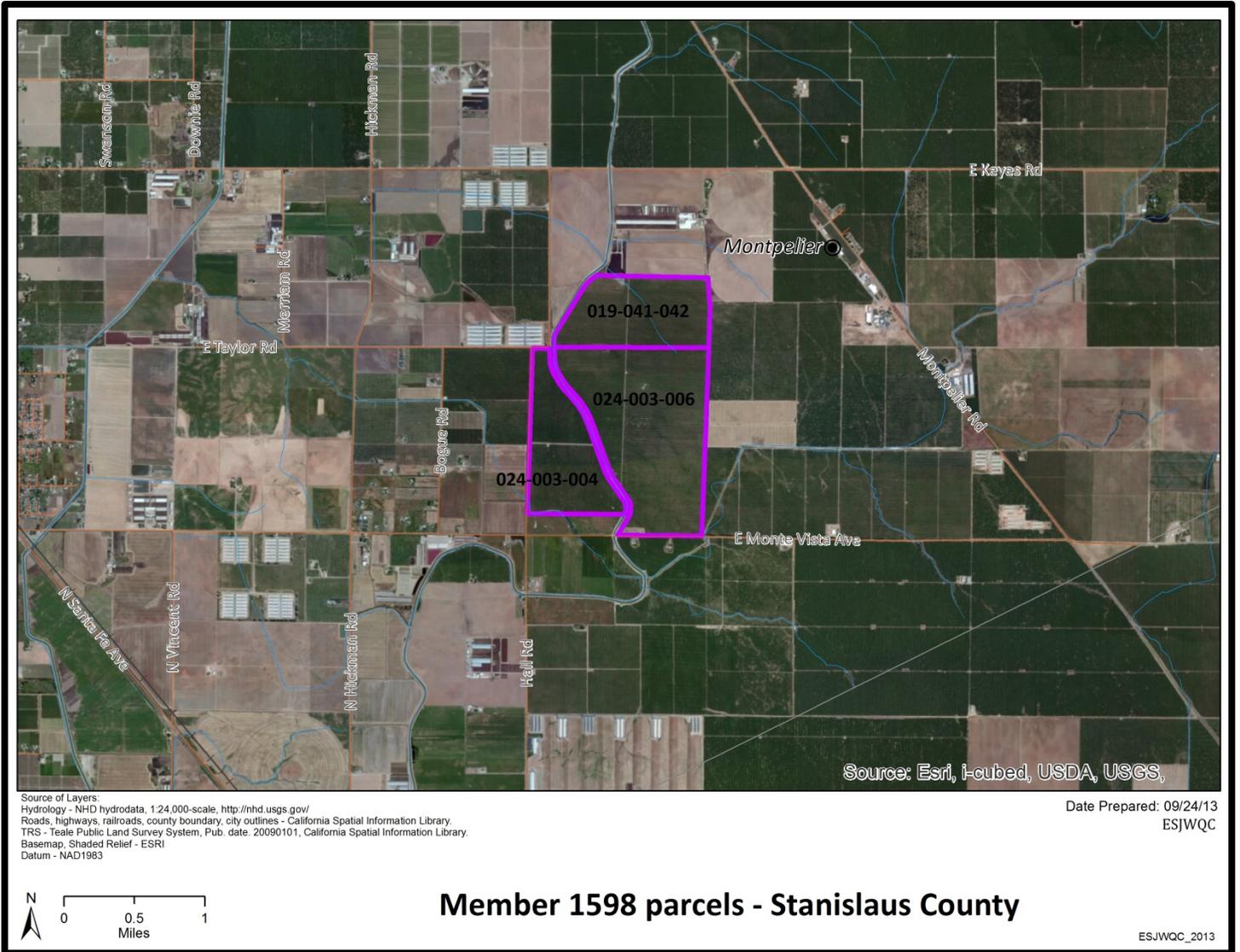


**RETURN TO COALITION IF PARCEL / FIELD INFORMATION NEEDS TO BE UPDATED**

# Farm Evaluation

## Farm Map - Part D

Aerial map – use for reference when determining which parcels the survey applies to and correcting field boundaries.



RETURN TO COALITION IF PARCEL / FIELD INFORMATION NEEDS TO BE UPDATED