
Central Valley Regional Water Quality Control Board

2 December 2013

Parry Klassen, Executive Director
East San Joaquin Water Quality Coalition (Coalition)
1201 L Street
Modesto, CA 95354

Dear Mr. Klassen,

Thank you for the 21 November 2013 submittal of the revised Farm Evaluation Template associated with the Waste Discharge Requirements General Order R5-2012-0116-R1 for Growers within the Eastern San Joaquin River Watershed (Order). The Farm Evaluation Template was revised in response to the 14 June 2013 staff comment letter.

Central Valley Water Board staff appreciates the effort that the Coalition and the other agricultural representatives have made in revising the Farm Evaluation Template to address issues identified by staff. Many of the comments made by staff have been satisfactorily addressed (see page 3). However, the Farm Evaluation Template still does not allow the grower to identify the sediment and erosion control practices being used, where applicable. Failure to include this critical element in the Farm Evaluation Template will not allow the board to approve the template and will require the Executive Officer to provide a Farm Evaluation Template that is consistent with the Order.

In addition, there are two other issues that should be clarified:

- 1) How will a Member be informed as to whether their parcel is in a high vulnerability area? The Farm Evaluation would appear to be a cost effective method for identifying whether a parcel is in a high vulnerability area, but it does not appear this recommendation was addressed.
- 2) How will a Member indicate if they have different pesticide application practices on different fields? The form seems to imply that the pesticide application practices will apply to all fields.

Finally, we understand that the Sediment and Erosion Control Plan template revisions will be submitted at a later date, but prior to the deadline for Members to prepare the Plan. Also, we understand that revisions to the Nitrogen Management Plan (NMP) and NMP Summary Report Templates will not be made until the board provides further

direction based on recommendations from the California Department of Food and Agriculture's Nitrogen Task Force and the State Water Board's Expert Panel.

Please provide your revised Farm Evaluation Template, or your schedule for providing the revisions, by 6 December 2013. Note that the Coalition Members in High Vulnerability Areas must submit their Farm Evaluation by 1 March 2014. If you have any questions or would like to discuss this further, please contact me at jkarkoski@waterboards.ca.gov or (916) 464-4668.

Sincerely,

Original Signed by

Joe Karkoski, Program Manager
Irrigated Lands Regulatory Program

Summary of the Adequacy of the East-side San Joaquin Coalition Responses to 14 June 2013 Staff Comment Letter on Templates for Farm Evaluation, Nitrogen Management Plan, and Sediment and Erosion Control Plan

The numbers below refer to the comment numbers in the 14 June 2013 comment letter.

- 1. Instructions to Growers** – not included and required. Coalition has indicated the instructions for the Farm Evaluation will be provided for Central Valley Water Board review after the Farm Evaluation Template has been approved. Staff believes receiving the instructions after the template has been approved is appropriate.
- 2. Certification Statement** – included in the revised Farm Evaluation Template, as required.
- 3. Linking Practices with Location** – management practices have been more clearly linked to the location where those practices are implemented. However, pesticide management practices are assumed to be common to the whole farming operation and it is not clear that this will be the case in practice. The item needs further clarification.
- 4. Common Data Fields between Templates** – the revised Farm Evaluation Template has been provided, but the other templates have not yet been provided. It is, therefore, unclear whether the other templates will use common data fields. This comment must be addressed as part of the submittal of the other templates.
- 5. Electronic Templates** – the electronic templates will be developed after the hard-copy version of the template is approved.
- 6.** The issues associated with the comment appear to have been addressed.
- 7.** The recommendation to include data field to identify whether a parcel is in a high vulnerability area has not been addressed. The item needs further clarification.
- 8.** The recommendation to improve the information collection on wellhead protection practices has been addressed.
- 9.** The recommendation to improve the information collection regarding abandoned wells has been addressed.
- 10.** The revised Farm Evaluation Template does not include any method for growers to report their sediment and erosion control practices. This item must be addressed.
- 11.** The new template format appears to address the clarification requested.
- 12.** The recommendation to specify the types of practices associated with “Water application scheduled to meet need” and “minimize leaching” have been addressed.
- 13.** The issue regarding keeping the Farm Map on-site has been addressed through modifications to WDR.
- 14-16.** Issues associated with the Nitrogen Management Plan and Nitrogen Management Plan Summary Report templates are expected to be addressed after the recommendations from the California Department of Food and Agriculture Nitrogen Task Force and the State Water Resources Control Board’s Expert Panel are considered by the State Water Board and Central Valley Water Board.
- 17-19.** Issues associated with the Sediment and Erosion Control Plan Template are expected to be addressed with submittal of a revised template prior to the deadline for growers to prepare their first Sediment and Erosion Control Plan.