California Regional Water Quality Control Board
Central Coast Region

895 Aerovista Place, Suite 101, San Luis Obispo, California 93401-7906
(805) 549-3147 • Fax (805) 543-0397
http://www.waterboards.ca.gov/centralcoast

Linda S. Adams.
Secretary for Environmental Protection

Arnold Schwarzenegger
Governor

Agricultural Order Renewal

Public Comments and Alternatives to

02/01/2010 Preliminary Draft Staff Recommendations

Group 12: Comment Letters

Comment ID	Affiliation	Date Received
F61	Mark Kelton (Domain Coorperation)	03/31/2010
F62	Mark Kelton (RCT 2003, LLC)	03/31/2010
F63	R. Donald Warden	3/31/2010
F65	Michael Armstrong	03/23/2010
F66	Brian Driscoll	04/01/2010
F67	Steve Garrett	03/26/2010
L8	Sarmento Family Partnership	03/31/2010
P21	Janice Meyer	03/29/2010
U14	Morgan Rafferty (Eco Slo)	04/01/2010

EXECUTIVE OFFICE

2716 OCEAN PARK BLVD., SUITE 3006
SANTA MONICA, CALIFORNIA 90405-5207
PHONE (310) 396-4514
FAX (310) 399-0062

Fax: (805) 543-0397
Chairman Jeffrey Young
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

March 31, 2010

Dear Chairman Young:

Our family has owned approximately **160** acres of farmland in the **greater Salinas Valley** for over 40 years. This property has been farmed by the same operator for almost the entire 40 years. We have reviewed a summary of your preliminary recommendations regarding Conditional Waivers of Discharges from Irrigated Agricultural Lands and have also discussed these recommendations with our long-term farming tenant.

A great many of the preliminary recommendations create significant burdens and costs for our tenant and are likely to substantially impact the viability of his operation. Over the many years that he has farmed this property, he has invested hundreds of thousands of dollars to monitor and reduce water use, improve water quality and reduce runoff. However, many of these proposed new requirements are unworkable for him. Additionally, they appear to contain standards that are subject to arbitrary interpretation. They also do not appear to equitably incorporate factors such as upstream runoff and variable soil types (especially soils with low-permeability). Finally, the buffers that are being proposed and/or the cost of the mitigations to reduce these buffers are likely to force substantial amounts of quality farmland out of production.

At this time more than ever, the California economy needs regulations that reasonably balance water quality concerns with the economic effect of each new requirement.

Accordingly, we respectfully request that CCRWQCB give careful consideration to the alternative proposal that the State Farm Bureau has submitted to you.

Sincerely,

Domain Corporation

By: _____
Mark Kelton
Vice President

cc: Vice Chairman Russell Jeffries
John Hayashi
David Hodgin
Monica Hunter
Tom O'Malley
Gary Shallcross
Roger Briggs, Executive Officer
Angela Schroeter, Senior EG

RCT 2003, LLC
2716 Ocean Park Blvd., #3006
Santa Monica, CA 90405
Phone (310) 396-4514
Fax (310) 399-0062

March 31, 2010

SENT VIA FACSIMILE ONLY
TO: (805) 543-0397
(total # of pages = 2)

Chairman Jeffrey Young
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Chairman Young:

Our family-owned company owns approximately **212 acres** in the greater **Santa Maria Valley** that have been farmed in row crops for many years. We have reviewed a summary of your preliminary recommendations regarding Conditional Waivers of Discharges from Irrigated Agricultural Lands. We have also discussed these recommendations with a number of members of the agricultural community.

There are so many of these new requirements that are problematic that it is hard to know where to start. A number of these potential new requirements clearly will require a very significant increase in grower time and in growers having to incur additional employee and third party consultant expense. Of equal or greater significance are the size (in combination with the costly mitigation measures) of the proposed increased buffers related to aquatic, riparian buffer and pesticide spraying. This will result in the loss of a significant amount of cropland, either directly or due to it becoming cost prohibitive to farm.

To implement sweeping requirements that adversely affect our ability to farm competitively in a global market couldn't come at a worse time. Right now our economy needs every ounce of productivity we can muster. Many of these new proposals will do exactly the opposite – they will make us even less competitive in the global marketplace. Any new regulations need to carefully balance the benefit with the associated cost.

We respectfully urge you to give careful consideration to the alternative proposal that the State Farm Bureau has prepared.

Sincerely,

RCT 2003, LLC

By: _____
Mark Kelton
President

Chairman Jeffrey Young
Central Coast Regional Water Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Fax: (805) 543-0397

March 29, 2010

Dear Chairman Young,

I have farmed in the Los Osos Valley near San Luis Obispo on a farm that has been in continuous family ownership and management since 1868. I have operated the farm for 46 years after teaching at Cal Poly and working for the Department of Water Resources after graduating from Cal Poly as an Agricultural Engineer. I have never been so discouraged about the future of irrigated agriculture as I am after reading the proposed February 1, 2010 Draft Agriculture Order. I have eight employees including seasonal workers. My irrigated ag consists of about 40 per cent of the crop land that is rotated every year between vegetables, dry land crops and hay.

The land is in the Los Osos valley and much of it is bounded by ephemeral creeks and only one irrigated crop is grown on 40 per cent while the rest is rotated to a dry land crop or planted in hay. At best, we might break even or make a slight profit on a good year. In summary the issues proposed in the February 1, 2010 Order below concern me:

1. Removing 100 feet of crop land to create habitat next to streams would remove approximately 25% of the total.
2. Restricting ground application of pesticides from 50 to 150feet from streams would reduce available crop land.
3. Restricting fertilizer applications to 3 days before and after it rains without regard to the time of year, weather report, the type of crop nor the method of application.
4. A nutrient management plan prepared by a certified crop advisor as well as other monitoring reports that are expensive when in many cases management information is available to the farmer from other sources.
5. We have used drip irrigation exclusively for the last eight years and have no run-off – but meeting 85% distribution uniformity on sloping and irregular fields is improbable.
6. Even though we might be designated a low impact discharger, the cost of monitoring turbidity, sediment, nutrients and salt will place an undue burden on a small farm.

These are but a few of my concerns and I would hope that the awareness and progress that was made under the 2004 Conditional waiver can continue. I have read the proposal by the Ag Community and ask that you adopt the Alternative Proposals Developed by the Agricultural Community and not continue review of Staff's Proposal.

Sincerely,

R. Donald Warden

R. Donald Warden
7515 Los Osos Valley Rd., San Luis Obispo, CA 93405

3-16-10

Via First-Class Mail & Email
aschroeter@waterboards.ca.gov
hkolb@waterboards.ca.gov

Ms. Angela Schroeter
Agricultural Regulatory Program Manager
Mr. Howard Kolb
Agricultural Order Project Lead Staff
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA. 93401-7906

Re: CCRWQCB Request for Public Comments on Preliminary Draft Agricultural Order dated February 1, 2010

Ms. Schroeter and Mr. Kolb:

I am the _pres._ of Toro Creek Ranch which has been located in Morro Bay,San Luis Obispo since 1977. We are _growers of oranges, avocados and kiwis who _provide jobs to 15 employees on and off and cultivate _50 acres located in Region 3.

I have been following the progress of this Board's renewal of the Conditional Waiver of Waste Discharge Requirements for Discharges from Irrigated Lands ("Ag Order") and am concerned with Staff's draft Ag Order. The draft Ag Order will negatively impact my ability to continue producing my crops. The draft Ag Order contains many undefined and potentially highly impractical requirements for all agricultural operations. Of particular concern to my operation is*: regulating non-storm water discharge that must have no toxicity, drinking water standards for nitrates, low turbidity, and temperatures below 68°F; keeping rainwater and/or stormwater separated from wastewater and irrigation runoff; additional surface water sampling; inclusion of groundwater sampling; installations of pesticide and riparian buffers; the revised Farm Water Quality Management Plan; the nutrient management element of the Farm Plan.* This is very concerning to us because some of the proposals are physically impossible, some are prohibitively costly and some will take existing production out of production. Please understand that we are a small operation , work very hard for very little return and for you to impose these types of rules and regs. on us would be devastating! We already implement numerous best management practices to reduce runoff by using drippers and mini-sprinklers. Any pesticides used are in complete compliance with label requirements. I follow all requirements set up by my Ag Commissioner. To reduce erosion there are cover crops in the orchards Water is a costly and precious resource, and we have implemented a variety of practices to reduce the amount we use and *limit* discharges.
I urge the Board to listen to growers' feedback and suggestions, including mine, and incorporate all of this feedback into the draft Ag Order. Any future Ag Order must be designed with achievable objectives and must be a transparent and collaborative process that utilizes agricultural stakeholders. Loss of grower cooperation will be counterproductive to improving water quality.

Respectfully submitted,
Michael Armstrong-Toro Creek Ranch
Michael Armstrong

H. Kolb
MAR 23 2010

STATE OF CALIFORNIA
CENTRAL COAST WATER BOARD
Received
MAR 23 2010
895 Aerovista Place, Ste. 101
San Luis Obispo, CA 93401

KB FARMS, LLC.
P.O. BOX 1115
AROMAS, CA 95004

March 30, 2010

Mr. Roger Briggs, Executive Officer
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Mr. Roger Briggs, Executive Officer,

Our family has been farming in the Pajaro and Salinas valleys for more than 70 years. Over that time we have purchased three different ranches – The Brown Ranch in Aromas, the Ashcraft Ranch on Beach Road in Watsonville and the Fennel Ranch on River Road in Salinas. We have mainly farmed strawberries, but I have also expanded into blackberries and raspberries on the Brown Ranch. I have been farming now for five year and desire to farm for another twenty-five years. My father farmed for over thirty five years and my grandfather farmed almost forty years.

I have tried to become involved in various organizations to better inform myself of the current issues facing agriculture in the Pajaro and Salinas valleys. I realize that agriculture needs to work with and within the community to create a sustainable system so that my children can have the opportunity to farm the same areas I have farmed, my father farmed and my grandfather has farmed.

The 2010 draft Ag Waiver would adversely affect my farming operations and severely impact the farmabilty of our family ranches. The monitoring costs are estimated at upwards of $1,200 per year per ranch. The non-compliance costs could be steep and worse case would be having to take a farm out of production completely.

As a young farmer starting out, it is in my best interest to be a good steward of the land and environment for my children and my children's children. Our operations are very aware of the optimal use of fertilizer, and over fertilization would cost additional money with no increase in yield and thus return. It is not in my best interest to over-fertilize.

We have been actively trying to maintain our drainage ditches. We plant grasses where possible to filter any tail water flowing through our ditches. A major problem arises when we rotate with vegetable crops because of the Leafy Greens Marketing Agreement. This agreement requires vegetable farms to remove vegetation from ranch perimeters and thus the filter grasses we plant in ditches.

My biggest concern right now is that I will be responsible for what flows onto our ranches from the neighboring lands, county roads or uphill businesses. How am I supposed to prevent discharges of somebody else's water onto my ranches?

The reduction in nitrate from tail water run-off and well water would be all but impossible to comply with on our Brown Ranch. We have noticed an increase in nitrate in our well water due to the increased residential construction in the Aromas valley. Each new home creates a new septic system. Since the Aromas valley is unique because of the granite bowl deep under the ground, these septic tanks do not percolate the nitrate created deep into the ground. Instead the nitrates from the septic system leach into the aquifer and this is the same water that we use for agricultural purposes. So why am I going to be responsible because the nitrates increase over the year due to residential septic systems?

Our Ashcraft ranch on Beach Road has some of the best soils in the Pajaro valley – Clear Lake clay. This ranch out produced all our other ranches in the 2009 harvest. The main reason we can farm this ranch in strawberries is due to the drain tile system. The water table and saltwater intrusion are very close to the surface. This subsurface water can be detrimental to root development, inhibiting the growth of our crop. By using the drain tile, the water table is effectively lowered, and our crop can properly develop their roots. When rain falls in the winter as it did this past December, the salts are pushed down in the soil and then removed via the drain tile system. Furthermore, the amount of water flowing down Beach Road past our ranch is substantial. I have seen the county's drainage ditch full to capacity, which causes water to seep under our earthen levee onto our ranch. Is the county going to contain their runoff water? Otherwise, the water and associated pollutants ends up on my ranch. If I can't use the drain tile system, my ranch becomes unfarmable and worthless.

Our Fennel ranch on River Road in Salinas has a moderate slope. To the west in the foothills is a quarry. Every winter, their sediment runoff flows onto our ranch. It clogs the water ways around the ranch and costs money to remove every year. How am I supposed to reduce sediment runoff, when the cause is coming from a neighbor's adjacent land?

Your requirements to prevent discharges and restore water quality are nearly impossible to comply with if you don't require all landowners, whether agriculture or otherwise, to contain their own water discharges – including the counties. I don't see how making me, a farmer, responsible for other's discharges and restoration is fair or just.

Thank you very much for your consideration of this matter.

Sincerely,

Brian Driscoll
KB Farms, LLC
P.O. Box 1115
Aromas, CA 95004

cc: Governor Arnold Schwarzenegger

F

GARRETT FARMS

March 22, 2010

H.Kolb
MAR 29 2010

Dear Chairman Jeffrey Young,

Garrett Farms LLC is a family owned business that currently farms 96 acres. Garrett Farms has been growing strawberries, raspberries and blackberries on the California central Coast for the last thirty years.

The 2010 Ag Waiver will significantly impact Garrett Farms LLC. There are several provisions in this waiver that will interfere with our farming operations. The first issue is the elimination of Tile Drains. If these drains are eliminated, Garrett Farms will loose almost 40 acres of productive farm land. The loss of Tile Drains will render this land useless do to flooding. Therefore, only one crop can be harvested in the late spring and summer months. Another issue the Ag Waiver presents is the increased riparian buffer zones. Garrett Farms already uses natural vegetation and riparian borders to prevent runoff from directly entering adjacent creeks and lakes. However, the increased buffer zone of 100 feet could potentially eliminate 20 acres of productive land. The increased buffer zone would present Garrett Farms with additional costs due to removing current crops, planting increased riparian areas and loss of income due to a decrease productive acres. The Ag Waiver also calls for nutrient and fertilizer applications to be under the control of a crop advisor. This would translate to increased consultation fees for producers. Another unacceptable restriction is the 72 hour waiting period before or after a rain event. It is impossible to be certain when it is going to rain. This restriction would prevent needed fertilizer and nutrients. Without adequate applications yield and production levels will significantly drop.

The provisions in the 2010 Ag Waiver are far too restrictive. The Ag Waiver calls for compliance in a very short time period. The current Ag Waiver will make farming very restrictive if not impossible for family farms. Increased regulations have a positive correlation with increased production costs. Production agriculture is a very important part of the central coast economy as well as California's economy. If production agriculture is lost in California there will be very drastic consequences.

Respectfully,

Steve Garrett
Garrett Farms LLC

P.O. Box 1647, Freedom, California 95019 408/724.5854 Fax 408/724.1025

Sarmento Family Partnership
33601 River Road
P.O. Box 775
Soledad, CA 93960

March 31, 2010

Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401-7906

Dear Board Members,

Re: Ag Waiver

Our Partnership is not actively engaged in cultural practices. Our ranch contains 1773 acres of which 905 acres are cultivated, all on drip irrigation except for 150 acres on a combination of drip, furrow and sprinklers. We have always been concerned for the care of lands under our stewardship.

Our lands are leased to others under leases. Two leases covering 188 acres are operated under a joint venture. The six lease terms covering our land in years are, 25, 29, 29, 30, 15, and 3. All of our lease holders have demonstrated the same concern for the care of the land as we do.

Although as land owners not actively engaged in the day to day cultural operations we are familiar with all the problems facing farmers. We have followed all the development of the current Ag Waiver and assisted and supported our growers as best we could. We know that they in good faith have developed their farm plans and attempted to comply with the intent of those plans.

Now they are faced with the potential of other more stringent requirements that require more substantial, time consuming and expensive undertakings. As a land owner we have no direct control over day to day activities, and only will we ever be aware of some deficiency real or imaginary, that an overzealous authority will cite and make us as landowners responsible.

We know our growers desire to protect the land that provides their livelihood and have no desire to cause any adverse effects to others. You can see from the length of the terms of our leases they are going to be on our land for a considerable length of time. Be kind to them. Approach your task with great wisdom.

Sincerely,

Ralph K. Sarmento

Ralph K. Sarmento, Manager

Central Coast Regional Water Quality Control Board

Chairman Jeffrey S. Young,

Dear Mr. Young,

I find the recommendations from the staff of the RWQCB to be counterproductive on most levels.

#1. "...annual ..detailed maps, ...wetland habitat areas, ...etc,

#3. "...certified crop advisor

#4 "....map and photo document existing....streams or ....area habitat...etc.

These are just of the few of the unnecessary, counterproductive cost prohibitive measures that are being imposed on local agriculture businesses.

Now is not the time to nit pick California's agriculture community to death. Agriculture supports the state. When growers are put out of business, the state goes under. It is teetering on the brink of bankruptcy now – further undermining the growers could be the final straw. Why cripple this huge segment of California's economy? Why kill the Golden Goose??????????????

If safety standards are needed in certain areas, state monitoring of those areas should be done at the cost of the state, not the individual farmer.

Stringent laws that render the businesses of the farmers, growers, dairymen unprofitable should not be imposed upon them. When these laws cause these businesses to become unprofitable, they not only harm the individual grower, but ultimately the state as well. One cannot argue against the fact that no income means no taxes and no tax collection by the state is definitely counterproductive.

Please consider the mitigation of these recommendations.

Janice Freear Meyer

Local businesswoman

P.O. Box 1014
San Luis Obispo, CA 93406
Phone: (805) 544-1777
Fax: (805) 544-1871
www.ecoslo.org

ENVIRONMENTAL CENTER
OF SAN LUIS OBISPO COUNTY

Protecting and enhancing the Central Coast since 1971

April 1, 2010

Jeffrey S. Young, Chairman of the Board
Roger Briggs, Executive Officer
Central Coast Regional Water Quality Control Board
895 Aerovista Place, Suite 101
San Luis Obispo, CA 93401

Via Email

Re: Preliminary Staff Recommendations for an Agricultural Order to Control Discharges from Irrigated Lands

Dear Chairman Young and Members of the Board,

These comments are respectfully submitted on behalf of the Board of Trustees and members of the Environmental Center of San Luis Obispo (ECOSLO), the oldest environmental advocacy and educational organization in San Luis Obispo County. We are writing in response to the Preliminary Staff Recommendations for an Agricultural Order to Control Discharges from Irrigated Lands.

We appreciate and fully support the Regional Board members and staffs' goal of healthy watersheds throughout the Central Coast. As a participant in the first Agricultural Advisory Panel Process for the original Conditional Waiver and in the Ag Advisory Panel Process that was unfortunately suspended last fall, we understand the value and importance of a collaborative effort in assisting the Regional Board in attaining their goals. We believe that the new order must be comprehensive, verifiable and enforceable. We recognize that there are serious water quality problems in the Central Coast Region that can be only be addressed through an order that includes positive and proactive measures to improve water quality using scientifically proven, technically and economically feasible methods.

The first ag order and its implementation provides a good working model upon which to build as we move into the next waiver period. As a result of the first conditional waiver, nearly 1,800 growers were enrolled, representing 400,000 acres of farmland. These growers met educational requirements, helped to create a cooperative monitoring program that they assessed themselves to fund, have developed their farm plans and have worked to improve their management practices. It is acknowledged that the first waiver was not perfect; however, it was the foundation of a long and complicated process that will take sustained efforts to be successful for all goals to be achieved. It has clearly been demonstrated that improvements to water quality, particularly groundwater, take extensive efforts over long periods of time.

We believe that the new order should include the following components in order to be most effective and to make the desired improvements to water quality throughout the region:

- Farm Plans: The new waiver should continue the requirement for a Farm Plan. These plans can provide an excellent tool for growers to plan for needed improvements and to document compliance with the Ag Order if maintained properly. These plans should be updated as needed to show ongoing improvement in management practices. The Farm Plan should be made available to staff during visits for enforcement to demonstrate compliance with the Order.

- Management Practice Checklist: Growers should be required to submit a Management Practice Checklist annually to document the specific measures taken to comply with the Ag Order. This checklist should provide meaningful and relevant information regarding the practices developed and used to address any water quality problems on individual farms. The Monterey County Water Resources Agency Agricultural Water Conservation Plan (attached) provides a good example of a form that could be adopted by the Regional Board.

- Independent Certification: Growers should have the option of providing an independently audited and verified report of their management practices to the Regional Board in order to be considered a low risk discharger and to meet the requirements of the order. This could be accomplished through programs such as the Central Coast Vineyard Team's Sustainability in Practice (SIP) Certification or through audits by independent companies such as Primus Labs. Staff's proposal suggests SIP certification for vineyards but does not offer a similar option for other crops.

- Education: The new order should continue to require education. This is especially important for new growers. Those who met the original

education requirements could be required to complete fewer hours during the next waiver period. Staff has acknowledged the importance of continuing education, yet the staff proposal does not include any educational requirement.

- Cooperative Monitoring Program: The Cooperative Monitoring Program should be continued and expanded in order to document trends in water quality and to provide information to the Regional Board as well as growers regarding achievement of water quality standards or areas where improvement is still needed. We also need increased information based on trends analysis as there are more years of data collection completed. The Cooperative Monitoring Program should be expanded to provide more information in areas of concern and to identify potential sources of impairments. The Cooperative Monitoring Program water testing should focus on the priority agricultural water quality issues and the most severely impaired waters and continue to work directly with growers to provide them with water quality data for their operations so that they can develop appropriate management practices and evaluate the effectiveness of their management practices.

- Enforcement: Enforcement should be targeted to high risk operations and in areas of concern identified by the Cooperative Monitoring Program. These are the areas with the most potential for improvement. Enforcement should also target those recalcitrant growers who have yet to enroll in the program.

We have read the Preliminary Alternative Agricultural Proposal and find that it includes many of the same components we support for the new Ag Waiver including the Farm Plan, Practice Implementation, and "SMART" sampling. We urge you to consider their suggestions as improvements to the effectiveness and enforceability of the new order. We believe that the best way to accomplish all of our goals is to work together in a cooperative manner to ensure that progress in management practices continue so that water quality will continue to improve throughout the region.

Thank you for your consideration,

Morgan Rafferty, Executive Director

Office Use
address code :
staff : _____
date : _____

2010 Agricultural Water Conservation Plan

(Submit one plan per company)

Please check all that apply, fill in the acreage blanks and sign below.

☐ **I farm pro perty** in Zone(s) 2, 2A, or 2B; the information included in this Agricultural Water Conservation Plan for the 2010 growing season is correct; I am engaged in the business of raising crops for commercial purposes; and I will implement the irrigation management practices selected in this plan during the 2010 growing season. The amount of acreage that I will farm/operate **in 2010 ...**

☐ **will not change** since 2009.	☐ **will increase** since 2009.	☐ **will decrease** since 2009.

	Previous 2009	**Upcoming 2010**
① **GROSS ACRES** (All acreage **including** farm roads, buildings, etc.)	_____	_____
② **NET FARMABLE ACRES** (Physical field acres, Nurseries, **excluding** farm roads, buildings, etc.)	_____	_____
③ **NUMBER OF ACTIVE (OPERATIONAL) IRRIGATION WELLS**	_____	_____

Below, list reason(s) for any **changes in the number of wells** from the previous year. Include ranch changes (losses or gains) and any abandoned, destroyed, or newly drilled wells.

Added / Deleted	Ranch Name	Acreage	Number of Wells	Previous / New Company

X _____ X _____

Signature Print Name Date Phone No.

Designation:
COMPANY:
CONTACT:
ADDRESS:
CITY, STATE ZIP:

***NOTE*: If necessary, ple ase provide up dated comp any info rmation to the right of the e xisting infor mation.**

I would like my raw data kept confidential.

2010 Agricultural Water Conservation Plan

Please complete the chart below listing the number of Net Farmable Acres associated with the crop type(s) and irrigation method(s). Record the sum of all listed Net Farmable Acres on the "Total NET FARMABLE ACRES" line at the bottom of the chart (*do not multiply by number of crops per year*). Results of this irrigation method survey provide valuable and unique information regarding the status of irrigation practices in the Salinas Valley.

Enter the number of Net Farmable Acres per Irrigation Method below:

	Average number of crops per acre	Furrow Only	Sprinkler / Furrow combination	Hand-move sprinkler only	Solid-set or permanent sprinkler	Sprinkler / Drip Combination	Drip Only	Micro-spray / Micro-sprinklers	Linear-Move (overhead)	Other (specify): _____
Vegetables										
Field Crops (beans, grain, etc.)										
Berries	1.0									
Grapes	1.0									
Tree Crops	1.0									
Forage Crops (alfalfa, pasture, etc.)										
Other:_____										
Set-aside (fallow)										

Total NET FARMABLE ACRES: 0.00

Must equal your NET FARMABLE ACRES from page 1, line ⊘, 2010 column.

Company Name: _____

2010 Agricultural Water Conservation Plan

Irrigation Best Management Practices (BMPs)

For 2010, please indicate whether or not you intend to implement the Best Management Practice and how many Net Farmable Acres would be affected by the practice (***must not exceed the figure on line ②, page 1, 2010 column***).

For 2009, please indicate whether or not the Best Management Practice was implemented and how many Net Farmable Acres were affected by the practice.

For guidelines and definitions of terms, please refer to the Appendix on our website: www.mcwra.co.monterey.ca.us and click on "Misc. Forms".

	2009			2010		
Irrigation Management Practices	**Yes**	**No**	**Net Farmable Acres**	**Yes**	**No**	**Net Farmable Acres**
12-month Set-aside	☐	O	_____	☐	O	_____
Summer Fallow (90 days between Apr.1 and Sep.30) or Other Fallow (210 consecutive days)	☐	O	_____	☐	O	_____
Water Flowmeter(s)	☐	O	_____	☐	O	_____
Time-clock on pump and/or pressure switch on booster	☐	O	_____	☐	O	_____
Use of Soil Moisture Sensors and/or ET Data (CIMIS)	☐	O	_____	☐	O	_____
Pre-irrigation Reduction	☐	O	_____	☐	O	_____
Agricultural Mobile Irrigation Lab	☐	O	_____	☐	O	_____
Transplants	☐	O	_____	☐	O	_____
Educational Sessions (Applies to all Net Farmable Acres)	☐	O	_____	☐	O	_____
Conservation Program	☐	O	_____	☐	O	_____
Reuse of Tailwater or Run-off	☐	O	_____	☐	O	_____
Recycled Water (Castroville Seawater Intrusion Project)	☐	O	_____	☐	O	_____

Company Name: _____

2010 Agricultural Water Conservation Plan

Irrigation Best Management Practices (BMPs) continued...

	2009			2010		
Sprinkler Irrigation System Improvements	**Yes**	**No**	**Net Farmable Acres**	**Yes**	**No**	**Net Farmable Acres**
Reduced Sprinkler Spacing	☐	O	_____	☐	O	_____
Sprinkler Improvements (uniform nozzle sizes and/or flow control nozzles)	☐	O	_____	☐	O	_____
Off-wind Irrigation	☐	O	_____	☐	O	_____
Leakage Reduction (replacing gaskets)	☐	O	_____	☐	O	_____
Linear-Move (overhead)	☐	O	_____	☐	O	_____
Micro Irrigation Systems						
Drip Tape / Hose	☐	O	_____	☐	O	_____
Pressure Compensating Emitters / Tape (reduce pressure fluctuations along a row)	☐	O	_____	☐	O	_____
Micro-spray / Micro-sprinklers	☐	O	_____	☐	O	_____
Surface Irrigation System Improvements						
Surge Flow Irrigation	☐	O	_____	☐	O	_____
Shorten Field Run (Lessen furrow length or add a manifold line down center of field to cut water run in half.)	☐	O	_____	☐	O	_____
Tailwater Return System	☐	O	_____	☐	O	_____
Laser Leveling / Major Land Grading	☐	O	_____	☐	O	_____

Company Name: _____