

DRAFT

Agriculture Workgroup Discussion Summary

Assumptions Matrix

1. The fourth assumption indicating that the “Central Valley Water Board would coordinate with DPR and Agricultural Commissioners to gather pesticide tracking information,” does not accurately reflect what the coalitions would be doing in Alternatives 1 and 2. Under Alternatives 1 and 2, coalition groups would coordinate with Agricultural Commissioners to gather pesticide tracking information (similar to the current program).
 - To address this concern, the assumption will be applied to Alternatives 4 and 5 only, which is consistent with the description in the Alternatives Document.
2. The fifth assumption indicating that current ILRP costs will be estimated using average reported coalition fees, waiver fees, and Central Valley Water Board staffing, would not be accurate for estimating costs for groundwater components of Alternative 2. The costs of the current program would be less than Alternative 2 due to the development and implementation of Groundwater Quality Management Plans.
 - Current program costs will be used to estimate the costs for Alternative 1 and portions of Alternative 2. Additional information will need to be used to estimate additional costs for Alternative 2’s groundwater requirements. Such information would include estimates of costs to develop local groundwater management plans and other regional planning efforts to address groundwater quality concerns.
3. Fifth assumption: Using average coalition fees to develop cost information may not be a good measure for estimating grower costs. For example, some coalition fees are \$1 per acre, while certain subwatershed fees are as high as \$13 per acre.
 - We will consider specific individual coalition fees to the extent that per acre fees, along with acreage where these fees are applied, are provided. For coalitions in which fees are not provided, we plan to use average fees to estimate cost information.
4. Sixth assumption: Agricultural groups are concerned with using NRCS information to estimate baseline conditions and costs for management practices.
 - To address this concern, we will consider additional sources of information where available. Agricultural groups are encouraged to provide management practice cost information for consideration. We will also be looking at cost

information from other Water Board Programs; for example, the Central Coast program's estimated costs for individual farm plans.

5. Seventh assumption: The goals shown for individual farm plans would be addressed in coalition assessments in Alternatives 1 and 2.
 - This information will be considered in the development of the long-term program. The seventh assumption will be used to estimate the types of management practices that growers may be implementing in response to the requirement to develop individual farm plans under Alternatives 3-5.
6. Eighth and fourteenth assumptions: 2-years for implementation of individual farm plans and certified nutrient management plans would not be enough time.
 - The 2-year time period for implementation of individual farm and certified nutrient management plans is consistent with the descriptions in the Alternatives Document. We will consider this concern as we develop a staff recommended long-term program alternative.
7. Eleventh assumption: The proposed regional monitoring program for Alternative 4 may not be similar to the regional monitoring in Alternatives 1 and 2.
 - We agree. Alternative 4 proposes a regional groundwater monitoring component and also includes nutrient and pesticide tracking requirements (Alternatives 1 and 2 do not include these elements). However, the third-party regional surface water monitoring component for Alternative 4 should be similar to the regional surface water monitoring outlined for Alternatives 1 and 2. This assumption will be clarified to address this concern.
8. Fourteenth assumption: Groundwater monitoring wells may be required for Alternative 4, not just Alternative 5.
 - This is correct. The assumptions matrix will be modified to reflect this concern.
9. Fifteenth assumption: The monitoring description for Alternative 3 (Alternatives Document) does not support the assumption that "Monitoring associated with FWQMPs only would not include water quality monitoring."
 - The description in the Alternatives Document includes the following statement:

"Unless specifically required in response to water quality problems, owners/operators would not be required to conduct water quality monitoring of adjacent receiving waters or underlying groundwater. Required monitoring would include evaluation of management practice effectiveness (e.g.,

monitoring that an installed tailwater return system is preventing off-site discharge, review of erosion prevention practices after storm events, visual monitoring of turbidity of field discharge, and review of nutrient applications and estimated crop uptake).”

The above statement indicates that water quality monitoring would only be required in response to water quality problems. We will work to estimate monitoring that would occur under this alternative.

Preliminary Economic Analysis Approach

10. NRCS cost information may be too low for individual farm water quality management plans. Agricultural groups estimate that the average cost to develop an individual plan would be \$15,000.

- This information will be considered as we estimate costs for long-term program Alternatives 3-5. In addition to NRCS information, we will consider costs to develop individual farm plans under the Central Coast Water Board’s irrigated lands program.

11. Net income effects may be very difficult to quantify. For example, installation of a pressurized drip or micro-spray irrigation system may allow for a reduction in water use, but operation and maintenance costs may overshadow the water savings. Be cautious in estimating net income effects without considering costs that may be operational in nature; and therefore, difficult to quantify without experience.

- This is a well placed concern. Many operational costs may not be easily quantified, but exist none-the-less and should be considered. On the other hand, we must also consider potential and quantifiable cost savings to provide the best possible economic analysis. To address this concern, we will consider reasonable ranges of costs and savings where available. We will also be cautious when making large-scale general assumptions about savings for a particular management practice.