East San Joaquin Water Quality Coalition
1201 L Street Modesto, CA 95354
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December 6, 2013

Joe Karkoski
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Dear Mr. Karkoski:

This letter is in response to your letter dated December 2, 2013 regarding our submittal of the Farm Evaluation Plan Template. Attached with this letter and email is a revised version of the farm evaluation plan that reflects the changes requested in your December 2 letter.

The revised version includes the questions on practices for controlling sediment and erosion management.

To your specific comments in the letter:

1) A member will be informed about a parcel(s) being in a high vulnerability ground or surface water area on page 2 and 4 of the survey. As shown in the attached, that box will be checked in the information pre populated by ESJWQC on the top of the form if a parcel is designated high vulnerability. In the cover letter that will accompany the farm evaluation, we will define "high vulnerability" and include a review of the differing reporting requirements. While this is how ESJWQC plans to inform members of this designation, we would expect that other coalitions have the option to notify members about vulnerability designations in the manner they believe is most effective for their reporting systems.

2) In the majority of farming operations, pesticide practices do not differ on a field by field basis. Our intention with questions in Section A is for members to answer those questions for the overall farm only once whereas the questions on pages 2-4 are to be answered on a field specific level. In the next couple of weeks we will be performing beta testing with several members. If the results of our testing indicate this not to be the case, it will be simple to have those questions answered on a parcel by parcel basis.

Let us know if any refinements need to be made to the attached. We expect to begin sending this out as soon as we get your approval of the template. We will also send you the finalized member instructions after we have completed the beta testing of the farm evaluation.

Sincerely,

Parry Klassen
Executive Director

Part A – Whole Farm Evaluation

Member Name: _____ Coalition Member ID#: _____

1. **Pesticide Application Practices (check all that apply)**

- ☐ County Permit Followed
- ☐ Follow Label Restrictions
- ☐ Sensitive Areas Mapped
- ☐ Attend Trainings
- ☐ End of Row Shutoff When Spraying
- ☐ Avoid Surface Water When Spraying
- ☐ Reapply Rinsate to Treated Field
- ☐ Target Sensing Sprayer used
- ☐ Use Drift Control Agents
- ☐ Monitor Wind Conditions
- ☐ Use Appropriate Buffer Zones
- ☐ Use Vegetated Drain Ditches
- ☐ Monitor Rain Forecasts
- ☐ Use PCA Recommendations
- ☐ Chemigation
- ☐ Other _____
- ☐ Other _____

2. **If you have one or more Nitrogen Management Plans, who helped prepare the plan?** (Check all that apply)

- ☐ Certified Crop Advisor
- ☐ Certified Technical Service Providers by NRCS
- ☐ Professional Soil Scientist
- ☐ Professional Agronomist
- ☐ None of the above

3. **Does your farm have the potential to discharge sediment to off-farm surface waters?**

(circle one) Yes No

4. **Complete Part D on sediment and erosion control practices used on farm field(s).**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel or represented Members properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment for violations.

_____ _____ _____

Signature ***Printed Name*** ***Date***

Part B – Specific Field Evaluation

Member Name: _____ Coalition Member ID#: _____

1. **Identify the Parcels and Fields that this survey applies to by checking the box in the first column below. <u>Fill out a separate survey for parcels/fields with different practices.</u>**
   - SW High Vulnerability is when a parcel is within an area covered by a Surface Water Management Plan.
   - GW High Vulnerability is areas having potential for groundwater contamination. See enclosed information for more information on vulnerability.

	High Vulnerability		Parcel (APN)	Field ID	Acres	Crop
	SW	GW				
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____
☐	☐	☐	_____	_____	_____	_____

2. **Irrigation Practices**

Primary	Secondary (if applicable)
☐ Drip	☐ Drip
☐ Micro Sprinkler	☐ Micro Sprinkler
☐ Furrow	☐ Furrow
☐ Sprinkler	☐ Sprinkler
☐ Border Strip	☐ Border Strip

3. **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)
- ☐ Soil Moisture Neutron Probe
- ☐ Pressure Bomb
- ☐ Other _____
- ☐ Other _____

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

- ☐ Cover Crops
- ☐ Split Fertilizer Applications
- ☐ Soil Testing
- ☐ Tissue/Petiole Testing
- ☐ Variable Rate/GPS
- ☐ Foliar N Application
- ☐ Supply Water Testing
- ☐ Fertigation
- ☐ Other _____
- ☐ Other _____

Part C – Irrigation Well Information

1. Do you have any wells on parcels associated with this Farm Evaluation? (Circle one) Yes No
2. Are you aware of any known abandoned wells associated with this Farm Evaluation? (Circle one) Yes No
3. For abandoned wells, mark the location of these wells on the attached map(s) or your own farm map 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*

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

Comments: _____

Part D – Sediment & Erosion Control Practices

Member Name: _____ Coalition Member ID#: _____

1. **Identify the Parcels and Fields that this survey applies to by checking the box in the first column below. <u>Fill out a separate survey for parcels/fields with different practices.</u>**

High Vulnerability		Parcel (APN)	Field ID	Acres	Crop
SW	GW				
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____
☐	☐ ☐	_____	_____	_____	_____

2. <u>Irrigation Practices</u> for Managing Sediment and Erosion

- ☐ In-furrow dams are used to increase infiltration and settling out of sediment prior to entering the tail ditch.
- ☐ The time between pesticide applications and the next irrigation is lengthened as much as possible to mitigate runoff of pesticide residue.
- ☐ Shorter irrigation runs are used with checks to manage and capture flows.
- ☐ PAM (polyacrylamide) used in furrow and flood irrigated fields to help bind sediment and increase infiltration.
- ☐ Use drip or micro-irrigation to eliminate irrigation drainage.
- ☐ Use of flow dissipaters to minimize erosion at discharge point.
- ☐ Tailwater Return System.

3. <u>Cultural Practices</u> to Manage Sediment and Erosion

- ☐ Storm water is captured using field borders.
- ☐ Vegetated ditches are used to remove sediment as well as water soluble pesticides, phosphate fertilizers and some forms of nitrogen.
- ☐ Vegetative filter strips and buffers are used to capture flows.
- ☐ Sediment basins / holding ponds are used to settle out sediment and hydrophobic pesticides such as pyrethroids from irrigation and storm runoff.
- ☐ Cover crops or native vegetation are used to reduce erosion.
- ☐ Hedgerows or trees are used to help stabilize soils and trap sediment movement.
- ☐ Soil water penetration has been increased through the use of amendments, deep ripping and/or aeration.
- ☐ Crop rows are graded, directed and at a length that will optimize the use of rain and irrigation water.
- ☐ Creek banks and stream banks have been stabilized.
- ☐ Subsurface pipelines are used to channel runoff water.
- ☐ Berms are constructed at low ends of fields to capture runoff and trap sediment.
- ☐ Minimum tillage incorporated to minimize erosion.

Part E - Farm Map

(Keep Onsite- For Inspection Purposes Only)

Update map with well locations and surface water discharge points.

Legend

X – In Use Well Locations

A – Known Abandoned Well Locations

DP – Off Farm Surface Water Discharge Points