

From: [Challender, Rebecca - NRCS, Davis, CA](#)
To: Jimmerson, Chris@Waterboards
Subject: Comments on San Joaquin County and Delta Area Farm Evaluation template
Date: Monday, July 07, 2014 2:57:04 PM

Thank you for the opportunity to review the San Joaquin County and Delta Area Farm Evaluation template.

As you may know, NRCS has been working with agriculture for many decades to implement conservation practices to conserve and improve water resources. We are pleased to be able to provide comments.

This document appears to be an opportunity for growers to begin an inventory of their farms and agricultural operations as they relate to water quality. Some comments are:

1. Part A – Whole Farm Evaluation: It is not completely clear that item #4 relates to item #3. If you are only to fill out Part D if you have the potential to discharge off-farm, then make #4 a subset of #3, or specify that “if you answered yes to #3, you must complete Part D”.
2. Part B – Field Specific Evaluation:
 - a. Item #2: The term “Irrigation Methods” rather than “Irrigation Practices” might be more accurate.
 - b. Item #3: A suggestion for the heading would be “Water Management” rather than “Irrigation Efficiency Practices”. Most of the practices listed apply to tracking crop water use and monitoring soil moisture to aid in making irrigation decisions. It is also important to measure the amount of water applied and correlate the amount applied to the amount of water the soil can hold at the time of irrigation. A new check box capturing this would be ideal.
3. Part D – Sediment and Erosion Control Practices:
 - a. Item #2:
 - i. The mention of pesticide applications in this section seems out of place.
 - ii. There are many ways to manage sediment and erosion. Include a checkbox and blank line marked “Other” so the grower can add practices implemented that may not be on the provided list.
 - b. Item #3:
 - i. The first checkbox says “Storm water is captured using field borders”. There are other ways to capture and manage storm water flows, some of which follow in the checklist, but this implies field borders are the only method. Ideally, it should be noted that many of the practices on the list may also be used to manage storm water flows.
 - ii. Well maintained and functioning riparian systems and improved streambank habitat will aid in the management of sediment and erosion. For those fields adjacent to streams and creeks, this is another opportunity to protect surface waters. Possibly an additional checkbox could capture these two practices.

- iii. Again, it is a good idea to have an “Other” checkbox to capture those practices not on the list.

Thank you-
Beckie

Rebecca Challender
State Water Quality Engineer
USDA – Natural Resources Conservation Service
430 G Street, Davis, CA 95616
(530) 792- 5621

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