

Smith, Megan

From: Danielle D'Amour [DanielleD@fishfriendlyfarming.org]
Sent: Friday, 24 September 2010 13:21
To: ILRP Comments
Subject: ILRP Comments
Attachments: ILRPcommentletterFINAL.pdf

Dear Ms. Megan Smith,

Please find attached the California Land Stewardship Institute's comments on the Central Valley Board's Irrigated Lands Regulatory Program Draft Program Environmental Impact Report (PIER). Please let me know if you have any questions or require any additional information.

Thank you,

Danielle D'Amour

Fish Friendly Farming Program
California Land Stewardship Institute
550 Gateway Dr. #108
Napa, CA 94558
danielled@fishfriendlyfarming.org
(707) 253-1226

CALIFORNIA LAND STEWARDSHIP INSTITUTE
550 GATEWAY DRIVE SUITE 108
NAPA, CA. 94558
707 253 1226

ILRP Comments
Ms. Megan Smith
ICF International
630 K Street, Suite 400
Sacramento, CA 95814

Re: Comments on the Central Valley Water Board's Irrigated Lands Regulatory Program (ILRP)
Draft Program Environmental Impact Report (PIER).

September 24, 2010

Dear Ms. Smith,

The goals and objectives of the ILRP are congruent with the goals and achievements of the incentive based Fish Friendly Farming (FFF) Environmental Certification Program, run by the California Land Stewardship Institute (CLSI). The FFF program aims to reduce non-point source pollution caused by agricultural practices, hydro-modification, roads, and stream bank erosion and improve fish and wildlife habitats. The FFF program should be considered as a possible Optional Individual Certified Farm Water Quality Management Plan (FWQMP) as a means for waste discharge compliance as projected by the ILRP program so that FFF certified farms can be considered "lower priority". It is a valid and cost effective alternative to the current suggested programmatic alternatives.

The Fish Friendly Farming Program currently operates in the San Francisco Bay (Region 2) and North Coast Regions (Region 1). It has been proposed as a means of implementing the requirements of several adopted TMDL in Napa, Solano, Sonoma, and Mendocino Counties. To date, there are over 130,000 acres enrolled in the FFF program. The program entails grower outreach and education, one-on-one site evaluations, assistance with preparation of farm plans and identification and implementation schedules for Best Management Practice (BMP) implementation, stream restoration plans, and agency farm plan certification.

The product of the FFF program is to develop a farm conservation plan for each property that addresses the unique possible contaminant sources (soil conservation, creek networks, road networks, water conservation, chemical use and new plantings) of each site and recommends Best Management Practices to mitigate each source. For example, the program addresses all possible sources and pathways for chemical contamination of surface and groundwater. Required BMPs address proper agricultural chemical storage, mix and load sites, application methods and equipment calibration, chemicals used and their toxicity for fish and wildlife and alternative cultural and non chemical methods for pest and disease control. All avenues for chemical movement off site are investigated including soil erosion, direct runoff, rainfall, drift, spillage, and basic protective measures such as berms around all wells. In addition, buffers along waterways are evaluated. BMPs include recommendations to plant native riparian vegetation

along waterways to increase the riparian corridor, and/or to plant a dense grass cover crop to intercept fine sediment delivery.

The landowner supported by FFF staff, present the farm plan to the team of agency certifiers. The team consists of representatives of the National Marine Fisheries Service, the Regional Water Quality Control Board, and the County Agricultural Commissioner. The team reviews the farm plan and implementation timeline and validates its accuracy, completeness and the proposed timing of implementation. Yearly and seasonal photo-monitoring of each site is required to ensure the BMP recommendations are being implemented. Areas of focus include winterization of the farm, including all roads, creek corridors, and the progress of all projects. This provides evidence that the farmer is managing the property in compliance with the federal Clean Water Act and, in areas where there are endangered species, the Endangered Species Act.

The certification is valid for 5 years, at which time the site can apply to be re-certified. At this point, the certifiers review the plan and check to make sure that the BMPs have been implemented. Provided the farmer has made adequate progress and additional BMP recommendations are made for the next 5 years, the site will be re-certified.

In 2008, the El Dorado & Georgetown Divide Resource Conservation Districts (RCD) asked CLSI to work with them to establish the Fish Friendly Farming Program in El Dorado County in order to implement water quality improvements and demonstrate to the Regional Board through the certification process that farmers were compliant with regulations.. The primary environmental issue for agriculture in El Dorado County is water quality and to a lesser extent, wildlife habitat. El Dorado County agricultural lands are included in the Irrigated Lands Program of the Central Valley Regional Water Quality Control Board. Together, CLSI and the RCD applied for funding to the Sierra Nevada Conservancy and received a grant in 2008. The process of adapting the Fish Friendly Farming Program to fit the specific requirements of El Dorado County required a focus primarily on water quality and agricultural chemicals and the various pathways for contamination of surface and groundwater. This version of the FFF program also includes a broad variety of crops including apples, pears, prunes, peaches, cherries, walnuts, blueberries, Christmas trees and winegrapes.

The FFF program is a comprehensive and cost effective means to meet compliance for agricultural lands waste discharge requirements. It shares all of the same goals and objectives as the ILRP program and already has a proven track record in Water Board Regions 1 and 2. We request that the Fish Friendly Farming Environmental Certification Program be recommended for farmers to meet the requirements of the ILRP Program in the Central Valley Region 5.

Sincerely,

A handwritten signature in black ink, appearing to read "Laurel Marcus". The signature is fluid and cursive, written in a professional style.

Laurel Marcus
Executive Director