Implementation Procedures for Vegetable and Agronomic Crop BMP Manual

Purpose: The Vegetable and Agronomic Crop BMP Manual is a comprehensive document spanning most major row crop production areas statewide that was recently adopted in Florida Administrative Code. Unlike the checklist-based BMP selection process used for several other commodities, this manual utilizes decision-support tools that direct many of the BMP decisions "up-front" The target audience for this training memorandum is Implementation Team, UF/IFAS Cooperative Extension Service, and FDACS field staff. The procedure that follows should provide consistency in determining which BMPs are appropriate for a farming operation and submitted as part of the Notice of Intent (NOI) form. This document also recognizes and accommodates regional production practice differences inherent to certain commodities.

Procedure: Sequential use of the decision support tools which appear in different places within the manual is required to properly select appropriate BMPsl. The tools are designed to be used progressively, similar to building blocks, and consist of three sections:

(a) Baseline BMPs: a group of 13 general BMPs that are fundamental for most row crop operations;

(b) Decision Tree Flowchart: a flowchart used to to ascertain whether additional or more specific BMPs are necessary, with an emphasis on geographic region and/or type of farming activity;

(c) Risk Assessment Tool (incorrectly dubbed Vegetable Production BMP Checklist in this manual): a group of BMPs primarily for plasticulture vegetable operations in South Florida that routinely apply fertilizer rates in excess of UF-IFAS recommendations.

The procedures for properly using the BMP selection process is as follows:

1. Use the "General BMPs for all Farming Operations" list in **Attachment No. 1 on page 10** of the manual as a starting point. There are 13 BMPs that are on this list - oftentimes referred to as "baseline" BMPs. The compliance expectation is that all farming operations that use the manual shall reasonably attempt to implement these BMPs, as appropriate

2. Use newly developed worksheets which are being used by Implementation Team staff as a means to validate "material compliance" with the selected baseline BMPs. These worksheets were constructed to highlight the more prominent or definitive protective features of all 49 BMPs contained in this manual. They are to be used as a corollary tool in conjunction with best professional judgment in order to help quantify which BMPs qualify for NOI submittal;

3. Use the "BMP Decision Tree Flowchart" and associated "Geographic Regions Map" on **pages 7 through 9** of the manual. The flowchart may require additional performance standards (i.e., attachment pages) or the use of additional BMPs for farms located in the following geographic locations involved with the following types of activities:

- Plasticulture
- Seasonal farming operations
- Springs recharge basins
- EAA
- Agronomic crops in North Florida
- South Miami-Dade county
- C139 Basin

4. If farming in the **North Florida or South Miami Dade** regions, follow Attachment Nos. 2 and 3, respectively, on pages 11 and 12**.** There is no place to record this information on the NOI form, so growers should be instructed to follow the performance standards and keep any required records;

5. Based on the assessment and outcome of procedure step Nos. 1 and 3 above, record these BMPs on the "Candidate BMP Checklist" which is **Appendix Page A-5.** Disregard the first sentence of the instructions at the top of this page as these are incorrect and create confusion. The NOI form itself is on other side of the page, which is **Appendix Page A-6**;

6. Fill out the farm location and owner information on the NOI form. Refer to the "*FREQUENTLY ASKED QUESTIONS CONCERNING THE VEGETABLE AND AGRONOMIC CROPS BMP MANUAL FOR FLORIDA"* if there are questions about leased land operations;

7. Before completing the NOI form, there is an opportunity to gain "credit" for other BMPs in use that are not specifically required as part of this manual's decision support tools. Use the worksheet referenced in procedure step No. 2 above to see if other BMPs qualify for NOI submittal;

8. The last step entails a risk assessment survey for vegetable operations that routinely apply fertilizer rates in excess of UF-IFAS recommendations using the "Vegetable Production BMP Checklist" on **Appendix Pages A-1 and A-2.** This checklist requires the use of best professional judgment to determine which additional BMPs are appropriate to mitigate water quality impacts that may arise from fertilizing in excess of UF-IFAS recommended rates. Only complete Section III on **Appendix Page A-3** and disregard sections IV and V as they are duplicative. Send this form in with the NOI and have the grower keep a copy on file for his/her records;

9. Record all BMPs on the "Candidate BMP Checklist" and submit the now completed NOI form and associated "Vegetable Production BMP Checklist", if applicable, to FDACS at the address on the bottom of the NOI form;

10. Growers should maintain records of required BMP activities (these activities have been delineated in the manual using a "pencil figure" icon). All staff participating in this program should have a copy of the standard recordkeeping form prepared by FDACS. This form can be distributed to participating growers; and,

11. Stay abreast of new developments. Abbreviated commodity-specific manuals are under development, as are regional BMP kickoff meetings. Invariably, these events will create some additional, albeit slight, BMP implementation mechanic changes. They will also help streamline future processes involving this manual.

Summary Statement: FDACS has already compiled an errata list for future revisions to this manual. The NOI and aforementioned Risk Assessment Tool (checklist) will be improved and better coordinated as part of this next revision cycle which is expected to occur sometime in 2007. In the meantime, abbreviated commodity-specific manuals and regional worksheets used by Implementation Team staff will be widely available to "fine-tune" implementation results.