AGRICULTURAL PERSPECTIVE ON SECTION 208 PLANNING

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Water Quality management programs apply to many farmers and ranchers across the nation.

There are those in fact that feel nearly every farmer and rancher will be affected. I would not go quite that far, at least under normal conditions. In fact, the broad definition of non point sources refers to agricultural run off as rain washing fertilizers and pesticides and top soil into water. In view of the existing water conditions across the western states, you might be inclined to retort, "What rain and into what water."

There are several concerns that, at this time, are not totally clear as it relates to the effect of Section 208 on agriculture and as one person rather humorously put it, "It is a great deal easier to nail Jello to a tree than it is to totally understand 208."

Most of the time limits or deadlines seem to apply generally to 92-500 rather than 208 specifically; primarily because while most point sources of pollution are easily identified and treated, non point sources generally are spread over much broader territory, are less readily visible, and certainly evolve from many different sources, often producing less discernable affects.

It is questionable at this time whether agriculture as a whole can possibly meet any of the deadline dates.

There are several terms that are not really defined so as to give clear-cut understanding as to what is expected as far as agricultural compliance is concerned.

One of these terms appears frequently—it is "if appropriate." There seems to be no concensus of opinion as to what "appropriate" means in this instance and who will make such determination, and at what level.

A second rather nebulous term is "to the extent feasible." Again, what is the "extent feasible," and which level of government will necessarily determine the criteria by which this term will be defined. Are we talking about a national standard or a situation by situation approach? Obviously, these are definitions that must be forthcoming, and it will be a complex problem to apply such criteria to the varying agriculture across the nation.

Generally, there are two major agricultural operations which are affected by point source control programs. They are animal feedlots and irrigation return flows.

For concentrated animal feeding operations, national guidelines have been established that require discharge permits. All animal feedlots of 1,000 or more animal units are required to obtain such permits. A permit is also required if a feedlot containing 300 or more beef cattle or their equivalent animal units, has a stream crossing the feedlot or has a manmade ditch through which animal wastes can be discharged into a waterway. Smaller feeding operations may also be required to obtain permits if the discharge has a significant affect on the waterway.

Irrigation return flows can be major contributors of water pollution. These discharges will by included in general permits and are most usually covered under a regional or district permit within a state. But what about non point sources?

In this case, it is very difficult to determine what is and what is not a pollutant. It depends mainly on where it is. Sediments, nutrients, and salts can be found on any farm and are not pollutants until they interfere with the beneficial uses of water.

Land erosion, however, has been established as a major pollutant of surface waters.

A recent study published by the Senate Committee on Agriculture and Forestry shows that about 400 million acres of cropland are responsible for approximately 2 billion tons of sediment entering our nation's waters annually, and with it, just to add to the complexity of the problem—nutrients and pesticides which are most beneficial and important as a part of our agricultural industry, but in the waters—just another pollutant.

There are six very important components of the food and fiber production which are generally regarded as pollutants. They are: Sediments, nutrients, salts, organics, pesticides and herbicides, and disease-producing organisms.

The planning process for water quality management for agriculture is generally no different than any other segment of the population, except that <u>ALL</u> agricultural lands, whether in a designated or undesignated area are included in the water quality management process.

If a farmer is regarded as not causing a water problem, he will probably not be in any way affected by the 208 planning process. However, if a farmer's land is identified as a source of pollution, then he will be expected to employ best management practices to minimize the pollution.

The biggest problem in agriculture is the same problem as in all other segments of the populace; getting understanding and equally important, getting involvement.

It is important especially to get farmers and ranchers involved in the early planning process, and this will require a massive educational program.

Farm Bureau has developed a short slide presentation which, hopefully, makes the 208 program more clearly understood and points out the need for individual involvement. It is our hope to get this tool into use in counties and local areas throughout the country, so that farmers can realize how important a stake they have in a sound local program.

I would like to show you our presentation, which we hope can turn suspicion, distrust, and confusion into knowledge and cooperation and participation.