New Jersey Highlands Council

CommentPro

New Jersey Highlands Council **Letter 81**

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The RMP is correct in focusing on the preservation of the agricultural land base and has developed appropriate priorities and mapped these areas. These policies should be maintained. More thought needs to be given to link agricultural GPOs to others: e.g., water quality, cultural resources (scenic landscapes) or "working landscapes". Policies making condemnation of preserved farmland and farmland preservation easements more difficult needs to be added. Stress and expand the "clearinghouse" function mentioned in Policy 3A8 with specific information on sustainable practices, including organic agriculture. Produce the technical guidance for mentioned in Policy 3E1 for municipal and county ag. retention and conservation plans. Require these for conformance in the ARA. Consider developing specific product branding for Highlands agricultural products. Indicators: Agricultural land conversion (land cover), Land area in field crop production, area in grazing, area in orchard, number and location of farmers' markets, direct marketing trends, preserved farms: area $$ expended, cost/ac., farm size, important farmland soils in ag. use, Changes in ARA land use, #of open space and farmland preservation trust funds with rate and $$ available, farm income.

These comments deal with the relationship between groundwater quality, surface water quality, carbonate rock (karst), geology and agriculture. Substantial and rapid transport of surface pollutants generated by agriculture can and does take place in karst areas. Pollutants of concern include sediment, phosphorous, nitrogen (nitrates), pesticides, metals, herbicides, and pathogens. These pollutants can move rapidly through voids and sinkholes reaching the underlying aquifers. These aquifers, in turn, discharge rapidly to surface water. The RMP should adresses potential ground and surface water contamination from agricultural practices in karst areas. A comparison of the RMP Figure 3.20, Agricultural Resource Area (P.92) and Figure 3.19 Median nitrate concentrations (p.90) shows a striking association between agricultural uses and nitrate levels above .73mg/l. The RMP correctly states that Conservation Zone subwatersheds (dominated by agricultural land uses) "generally have the highest median nitrate concentrations..."(p.91). ANJEC recommends a combination of educational efforts and administrative responses to these conditions. The RMP's application of the nitrate dilution model does not include any r esponse to potential agricultural nitrate contributions. Examples of educational resources are found at : http://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs142p2_020218.pdf (brochure) and a more extensive guidance found at http://www.dcr.virginia.gov/natural_heritage/lokhomeland.shtml.

The Council should produce and distribute similar documents to the carbonate rock areas and provide technical advice to farmers working potential karst areas. Farm Conservation plans in carbonate rock areas where sinkholes are anticipated should be required to include NATURAL RESOURCES CONSERVATION SERVICE CONSERVATION PRACTICE STANDARD KARST SINKHOLE TREATMENT (No.) CODE 527 in farm conservation plans. Indicator: Ground and surface water monitoring should be directed specifically at the carbonate rock areas of the Conservation Zone to establish agricultural pollutant baselines (especially nitrate) and should be repeated over time to establish trends to determine the impact of the educational and administrative efforts mentioned above.

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