

## Watershed Agricultural Program SOP

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### 2.1.01.06

#### **IDENTIFIED RESOURCE CONCERNS (IRCs)**

An Identified Resource Concern (IRC) is defined as a resource concern on a farm identified using the ERP/AEM process but has not been captured on a Whole Farm Plan. This SOP will define the submission process, IRC approval and addition as a separate component within the WFP-2, a workload integration timeline, administrative documentation and tracking, and IRC communication to the Ag Program Committee.

#### **I) IDENTIFIED RESOURCE CONCERN (IRC) SUBMISSION PROCESS**

This section of the SOP outlines what BMPs are eligible for the IRC process using the Whole Farm Planning Guideline (2.1.02) and how IRCs are identified and approved.

1. IRC(s) identified by Planner during annual status review or other farm visit
  - a. BMPs eligible for IRC submission include:
    - i. New BMPs not identified on WFP-2
    - ii. Any Repair & Replacement BMPs unless it is an Emergency Repair (use Repair Form)
    - iii. any BMPs submitted through the Repair form deemed to be an IRC by the Managers
  - b. BMPs should not be submitted as IRC(s) and instead brought as a Whole Farm Plan revision when:
    - i. There is a significant change in the farm operation (ex. beef to dairy)
    - ii. Updating existing unimplemented BMPs
  
2. Use IRC Data & Tracking Form to document IRC(s)
  - a. New Whole Farm Plan CREP IRCs do not require the IRC form. These IRCs will be planned and placed in the WFP-2 at the time of the New Plan approval.
  - b. Existing Whole Farm Plan
    - i. One form per IRC
    - ii. Include any linked IRCs on main IRC form
      1. Linked IRC will automatically be grouped together on the WFP-2
      2. Note on form if any IRCs are linked to any existing BMPs
    - iii. Include all data, including issue statement, as the form will be used to populate the WFP-2 following ***SOP 2.1.01.07 'WFP-2 Formatting Codes and Definitions'***
    - iv. Provide rough planning estimates
    - v. If possible, have an initial consultation with engineer and/or technician

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- vi. All IRC information (forms, photos, maps, etc.) shall be kept in an IRC folder in the appropriate farm file by IRC form (J/Farms/"DEC-000"/Planning/IRC/IRC###)
- vii. Form will be used to track the progress of the IRC from initial approval to approval of the IRC revision
- viii. Tracking to be completed by Ag Admin staff (see Section III)
- 3. Hard copies of the IRC Data form(s) and supporting plan view map shall be submitted to the Whole Farm Planning Coordinator (WFPC). In addition, Farm name, Farm ID, and IRC#s shall be emailed to the WFPC.
  - a. IRC shall be submitted C.O.B. on the Friday prior to the Planner's Peer Review meeting
  - b. Plan view map should be included with the submittal
  - c. WFPC will forward a list of all IRCs by farm and form on the Peer Review agenda by the C.O.B. the Monday prior to the Peer Review
    - i. Emailed information format example:
      - 1. Hymers (DEC-171) – IRC1-4
    - ii. WFPC will also provide hard copies at the Peer Review meeting
- 4. IRC review and approval will occur at the monthly Planner's Peer Review meeting or another specially scheduled meeting
  - a. Planner's shall check the IRCs for the following:
    - i. IRC form(s) completeness
    - ii. Accurate BMP information (name, lifespan, NRCS/WAC code, units, pollutant category, etc.)
    - iii. Is there a proper issue statement
    - iv. Does the BMP(s) address the resource concern
    - v. Are BMPs properly linked
    - vi. Reasonable cost estimate
    - vii. Items that do not warrant discussion (these will be detailed at final revision when presented)
      - 1. Specific details of the BMPs
      - 2. Specific cost information
  - b. Planners will vote to approve the IRCs
    - i. A "yes" majority vote automatically advances the IRC
    - ii. A majority "no" vote can be:
      - 1. delayed for more information
      - 2. declined/eliminated from further consideration
      - 3. elevated to the Coach Review meeting
    - iii. The WFPC can elevate any IRC to the Coordinator/Manager (Management) level (at Coach Review meeting)
    - iv. Any policy decisions related to IRCs will be made at the Management level
    - v. Detailed minutes of the IRC discussion(s) shall be taken

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- vi. Any changes to the IRC form(s) need to be completed and returned to the WFPC by C.O.B. the Thursday after the Peer Review
  - 1. If changes/corrections cannot be made by the deadline, the IRCs will be postponed until the following month's Coach Review meeting
  - 2. Significant changes may have to come back to the Planner's Peer Review meeting (determined by the Planners and/or WFPC)
- 5. The WFPC will work with appropriate Ag Admin staff to finalize the list of approved IRCs, which will then be added to the next Coach Review Meeting agenda
  - a. The list of approved IRCs is for information telling Management what has been approved
    - i. The list on the agenda will follow the format in #3c.i.1
    - ii. They can review the IRCs by following the file path noted above (#2b.vi)
    - iii. The minutes from the Planner's Peer Review meeting will also be included with the Coach meeting agenda
  - b. If needed/requested, the Planner will be available at Coach Review meeting to address any questions not covered at the Peer Review (see items in #4a above)
  - c. After the Coach Review meeting the IRCs are official and can be added to the WFP-2 in the appropriate section and into FAME (see section III)
  - d. The Ag Committee will be informed quarterly of the approved IRCs (see Section IV)

### **II) IRC APPROVAL AND WORKLOAD INTEGRATION TIMELINE**

This section of the SOP outlines the process and timeline of how approved IRCs are identified in the annual workload development and prioritization process. This section also describes the timeline of utilizing the existing plan revision process to change approved IRCs to approved BMPs on the WFP-2.

- 1. IRC Forms – planners develop and submit to WFPC for Peer approval as needed throughout the calendar year.
  - a. IRC forms must be approved by the Planners by November 30 each year.
  - b. Approved IRCs must be entered in FAME by December 31<sup>st</sup> to be eligible for workload development for the following year.
- 2. A draft list of all prioritized existing BMPs and approved IRC's will be generated from FAME annually by the Project and Implementation Group (P&I) (see Guideline 3.1.01 - BMP Prioritization & Workload Development) and provided to the planners by January 15<sup>th</sup> to be reviewed for validation.
  - a. Upon receipt of the list, planners will have one week to return the list of valid IRC's to the P&I Group

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3. Valid IRC's will have Planner, Engineer and Technician assignments from the Project and Implementation Group to begin the IRC BMP revision process by February 15th.
  - a. Planners will utilize the engineering/technical staff to meet current standards and develop cost estimates for the IRC BMP.
  - b. IRC BMP revisions will follow and require the same documentation and process of a basic plan revision (SOP 2.1.01.02).
4. IRC BMP Revisions must be completed and approved by the August WAP Committee to become eligible BMP's for the following year workload.
  - a. The approval of IRC BMPs through the revision process does not guarantee inclusion in the final workload, which will be dependent on the annual BMP implementation budget and implementation areas.
  - b. IRC BMP revisions that are approved at the August WAP Committee but do not make the final cut for implementation the following year will be automatically included in the next years' workload.
  - c. If IRC BMP revisions are not completed by the August deadline, they do not roll over and must be re-prioritized in the next workload prioritization process.

### **III) IRC ADMINISTRATIVE DOCUMENTATION & TRACKING**

This section of the SOP outlines the procedures and responsibilities for adding IRC's to the WFP-2 & FAME after the Coach Review meeting and subsequent tracking of the individual IRC forms.

1. Administrative staff will forward Coach Review meeting agenda with a list of approved IRCs and/or IRCs requiring discussion along with the minutes of the Planner's Peer Review meeting. Format for IRCs on the agenda should be the same as the information provided to the planners (Section I, #3c I 1).
2. After the Coach Review meeting, administrative staff will create and populate the IRC section of the WFP-2 based on the data submitted on the IRC form (IRC1, IRC2RR, IRC3EX, etc.). IRC revisions will require a new WFP-2 revision number.
3. If there are any minor changes recommended at the Coach Review the IRC form and the IRC section of the WFP-2 will be edited accordingly by administrative staff.

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4. After the WFP-2 is reviewed and signed by the planner, administrative staff will copy the WFP-2 and mail to the Participant along with the letter explaining the IRC(s). No participant signatures will be required on a WFP-2 reflecting IRC's only.
5. Administrative staff will post approved IRC's in FAME as new BMPs. The Status of the IRC will be "DRAFT". When entering IRCs that are on supplemental landowners, they will be entered in FAME under the active participant. Once a revision pops a supplemental landowner's IRC, the planner will add a supplemental to the WFP-2 and a supplemental number will be given to that landowner which will link the IRC.
  - a. Administrative staff will scan and upload the WFP-2 in FAME; update the WFP-2 record in excel; and file original WFP-2 in the participant file in the resource room.
6. Administrative staff will be responsible for tracking IRC status on the IRC Tracking Form. The electronic copy in the Farm File (file path noted in Section I; #2f) should be used for all tracking.
7. Administrative staff will add approved IRC's for quarterly reporting to the Ag Committee.

### **IV) IRC COMMUNICATION TO THE AG PROGRAM COMMITTEE**

This section of the SOP outlines how the WAP Committee is to be informed of approved IRCs.

1. All approved IRCs are to be reported quarterly to the WAP Committee for information only. The information provided will be the IRC section of the WFP-2. Committee members can forward any questions to the Ag Program Manager that can be addressed at or before the WAP Committee meeting.
2. All approved IRC BMPs must go through the revision process once they are on the draft workload. This will provide the committee members the opportunity to review and/or approved planned IRC BMPs.