



November 6, 2014

SENT VIA EMAIL TO: Keri.yee@waterboards.ca.gov

Karl Longley, Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Dr #200,
Rancho Cordova, CA 95670

Dear Chair Longley and Members of the Central Valley Regional Quality Control Board,

We thank you for the opportunity to comment on the Draft Nitrogen Management Plan Template (NMPT) submitted by the East San Joaquin Coalition.

We, the undersigned organizations, have participated in the development of the Irrigated Lands Regulatory Program since 2008. Our engagement has included participation on the stakeholder group that advised on the development of waste discharge requirements, the CDFA Nitrogen Task Force in 2013, and the advisory committee that provided input the State Water Board's Expert Panel.

Through these processes, diverse stakeholders developed a shared understanding of the both the challenges involved in collecting and managing data related to nutrient use on farms, as well as the need to gather information to inform the regulatory process and the development of best practices to address groundwater impacts. Unfortunately, the NMPT and Summary Reporting requirements fail to meet the minimum standards agreed upon through those processes.

Reporting requirements to Coalition are misleading and inadequate

The most glaring problem with the NMPT is the nutrient ratio that is to be reported to the Coalition. The CDFA Nitrogen Task Force agreed that developing an understanding of potential nitrogen loss to the environment was a key information need. Yet the ratio to be reported to the Coalition is N application divided by the N need of the crop. This value has little – if any – relevance when trying to calculate the potential N loss to groundwater and when trying to reduce excessive application of N. Every other recommendation – including both the Task Force and the Expert Panel - used a basic ratio of Nitrogen applied to Nitrogen removed. Using the current NMP template, that ratio would be arrived at by dividing box #21 by box #7. Since the information is already in the template, repairing this error should be relatively simple.



The NMP summary report is also deficient in that it provides no overall figures on the amount of N applied. The ratio of N applied to N removed is of value, but only provides relative figures. In order to understand the scale of potential N loss to the environment – and thus the potential threat to groundwater - the figures that make up that ratio must also be reported, most importantly the amount of N applied. We recommend that the values in boxes 12-15, box 21 and box 7 be added to the summary report.

Finally, the CDFA Nitrogen Task Force was repeatedly told that irrigation types and timing are a key factor in the migration of nitrate to groundwater, yet neither the NMP template nor the summary report provide information about irrigation type, volume or timing.. Since information about irrigation practices is already provided in the Farm Evaluation Template (although not crop-specific irrigation information), it should be a simple matter to add that information to the NMP template and summary report.

NMP Worksheet

Given the importance that both the Expert Panel and the Task Force gave to developing our understanding of both available data and farming practices, we believe that the Nitrogen Management Plan Worksheet should include all available relevant data to help develop a robust and comprehensive picture of application and irrigation practices that impact nitrogen loss and groundwater quality.

Accordingly, the following changes and additions should be made to the NMP Worksheet:

Box 5 (Field #), should be expanded to include field location.

Additional boxes need to be added to the crop column to better understand crop N demands;

- Irrigation Type
- Rainfall (when and how much), and efforts to flush salts from the soil.
- Productive N uptake by perennials for sustained growth. This could be an “N sequestered” box

Box 7 – actual yield – we suggest amending the description to read “N removed – crop yield + non-market material removed from field” to better fit the description provided in the text.

Soil Nitrogen Credits (Estimated). We recommend including an “other N carryover” box to account for available N carryover not accounted for in categories 17 or 18.



Current box 22 (Crop Needs) - is this the same as box 8? Or is box 22 the prior year crop need and box 8 the current year? In any case, box 22 should be deleted, as this value is not relevant for reporting or for use in calculating a nutrient ratio. If this value is distinct from that in box 8, a new box can be created in the “crop” column to keep that information.

Current box 24 should be amended to calculate the appropriate nutrient ratio – that is, box 21 – total N credits and applications – divided by box 7 – N removed from the field. See explanation above.

Thank you for providing us the opportunity to comment on this document

Sincerely,

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