



1201 L Street Modesto, CA 95354
www.esjcoalition.org

September 12, 2018

Patrick Pulupa
Irrigated Lands Regulatory Program
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114

Re: Submittal of Irrigation and Nitrogen Management Plan (INMP) Templates for Waste Discharge Requirements General Order R5-2012-0116-R4 for Growers in the Eastern San Joaquin River Watershed, Amended by State Water Resources Control Board Order WQ 2018-0002

Dear Mr. Pulupa:

The East San Joaquin Water Quality Coalition (ESJWQC) has worked with other Central Valley coalitions and agricultural groups to update the Nitrogen Management Plan Worksheet and Summary Report templates to include additional requirements as outlined in Attachment B of the Waste Discharge Requirements General Order R5-2012-0116-R4. Attachment I is a list of Coalitions who contributed to the development of the templates.

Included in this submittal are templates and associated instructions for the:

- Irrigation and Nitrogen Management Plan Worksheet
- Irrigation and Nitrogen Management Plan Summary Report

There are two components in the Order which are not included in the attached Irrigation and Nitrogen Management Plan: Secondary Harvest (Component 24) and Nitrogen Sequestered in Wood of Perennial Crops (Component 25). Both of these components relate to how a grower should determine the yield to report on their INMP Summary Report. Yield is used to calculate the nitrogen removed value by multiplying yield by a nitrogen removed coefficient unique to each crop. To date, studies used to develop coefficients in crops such as almonds include the nitrogen sequestered in the perennial wood as part of the coefficient. Efforts are underway to ensure other perennial crops also include wood in the overall coefficient development.

Crops for which secondary harvest applies (e.g. straw baled after wheat, sorghum, barley or oat grain is harvested) would have different crop coefficients and should be reported separately. The Coalitions are aware of this situation and will work with its growers to ensure that the correct yield is reported for each specific crop such that the nitrogen removed values can be calculated accurately. Each Coalition will present the information to their growers regarding how to calculate yield for the crops that are grown in their region. The Coalitions agree that attempting to include these values on the INMP worksheet templates in a way that accurately captures a wide variety of situations would likely cause confusion among growers and would have the potential to lead to incorrectly reported yields and ultimately unreliable data.



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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines for knowing violations.

Submitted respectfully,

A handwritten signature in black ink, appearing to read "PK", is written over the printed name.

Parry Klassen
Executive Director
East San Joaquin Water Quality Coalition



Attachment I

Listed below are the agricultural coalitions who contributed to development of the INMP templates.

Buena Vista Coalition
East San Joaquin Water Quality Coalition
Grassland Drainage Area Coalition
Kaweah Basin Water Quality Association
Kern River Watershed Coalition Authority
Kings River Water Quality Coalition
San Joaquin County and Delta Water Quality Coalition
Westlands Water Quality Coalition
Westside San Joaquin River Water Coalition