



CALIFORNIA FARM BUREAU FEDERATION

OFFICE OF THE GENERAL COUNSEL

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Sent via E-Mail

Ashley.Peters@waterboards.ca.gov

March 3, 2017

Ms. Ashley Peters
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670

Re: Final Report of Y-to-N Removed Conversions for Central Valley Crops

Dear Ms. Peters:

The California Farm Bureau Federation (“Farm Bureau”) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 48,000 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

Farm Bureau appreciates the opportunity to comment on the literature review, titled *Nitrogen Concentrations in Harvested Plant Parts – A Literature Overview*, submitted to the Central Valley Regional Water Quality Control Board which provides yield (Y) to nitrogen (N) removed conversions for Central Valley crops. The literature review presents information on the best available nitrogen removed estimates for close to 99% of the crop acreage in the Central Valley, while also highlighting the number of factors that affect nitrogen concentration in harvested plants and areas where additional research is needed. As the literature review states, the availability of relevant data varies considerably depending on the crop. For some crops, little to no studies from California are available. For other crops, the available data is more than 50 years old and may not fully represent the modern growing system. Other studies provide some information, but need to be expanded with additional samples from Central Valley fields in order to calculate a proper estimate of the nitrogen concentrations in harvested plant parts. These caveats are important in the context of the Irrigated Lands Regulatory Program and the Nitrogen Management Plan Technical Advisory Work Group efforts. Thus, the literature review, as

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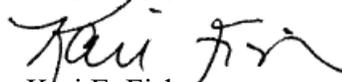
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well as the yield-to-nitrogen removed conversions and nitrogen applied/nitrogen removed ratio requirements within the Irrigated Lands Regulatory Program, should be viewed as an initial education tool for growers and not as a regulatory endpoint or target. As an educational tool, the information may be used to represent the general relationship of applied and consumed nitrogen so that patterns of nitrogen removal can become increasingly well understood over time as more scientific studies are conducted.

Very truly yours,



Kari E. Fisher
Associate Counsel

KEF/ph