

Buena Vista Coalition
Cawelo Water District Coalition
East San Joaquin Water Quality Coalition
Kaweah Basin Water Quality Association
Kern River Watershed Coalition Authority
Kings River Water Quality Coalition
Sacramento Valley Water Quality Coalition
Tule Basin Water Quality Coalition
Westside San Joaquin River Watershed Coalition
Westside Water Quality Coalition

March 3, 2017

Ms. Ashley Peters
Central Valley Regional Water Quality Control Board
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Sent Via Electronic Mail

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

Dear Ms. Peters:

Thank you for the opportunity to comment on the “Final Report of Y-to-N Removed Conversions for Central Valley Crops” which includes the report, “Nitrogen Concentrations in Harvested Plant Parts – A Literature Overview”. The literature review performed by Dr. Daniel Geisseler from UC Cooperative Extension is the most recent effort to provide meaningful estimates of nitrogen (N) removal across the Central Valley as required of the Central Valley Coalitions by the Central Valley Regional Water Quality Control Board (Regional Board).

This report should be considered in the broader context of the Nitrogen Management Plan Technical Advisory Work Group (NMP TAWG). Referencing the December 18, 2015 Crop Nitrogen Knowledge Gap Study Plan submittal, page 1, “The coalitions were cautioned by the experts about utilizing calculators without further review of their appropriateness to calculate and report N removed within the regulatory framework of the ILRP (Irrigated Lands Regulatory Program).”

Our initial submittal of N removed calculators submitted on December 18, 2015 was limited to 6 crops. After discussing our initial submittal with the Regional Board, it was clear that the available N removed values were meant to serve as a means to educate growers about their nitrogen applications and their

potential to affect groundwater quality, and were not intended to be used as regulatory endpoints. The information provided in the report “Nitrogen Concentrations in harvested plant parts – A literature overview” should be used to represent the general relationship of applied and consumed nitrogen so that nitrogen removal by crops can become increasingly well understood over time and be used as a tool to develop cropping systems for closer examination. The literature review also highlights the number of factors that affect nitrogen concentration in harvested plants as well as the limitations to the quality of the data. These caveats are important in the context of the ILRP and the NMP TAWG efforts.

With this understanding of the intended use of the information, we support the submittal and are committed to working with the agricultural industry and scientific community to improve the accuracy of the N removed conversion factors, where appropriate. Thank you for the opportunity to comment.

Sincerely,

Central Valley Coalitions

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