



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

July 2, 2018

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

RE: ESJWQC Nitrogen Management Plan Summary Report and Farm Evaluation Data Submittal for the 2017 Crop Year

Dear Mr. Palupa,

The East San Joaquin Water Quality Coalition (Coalition or ESJWQC) is submitting 2017 Crop Year data from returned Nitrogen Management Plan Summary Reports (NMP SR) and Farm Evaluations (FE). The data are reported on a Township-Range basis in the attached Excel workbook and Access database.

NMP Summary Reports

NMP SRs for the 2017 crop year were mailed to 2,834 Coalition members located in groundwater high vulnerability areas. Members in high vulnerability groundwater areas were not required to complete an NMP SR for one or more of their parcels if those parcels have wetlands or irrigated pasture with no external nitrogen inputs. Some members have parcels in both high and low vulnerability areas; they are only required to submit an NMP SR for parcels in high vulnerability areas.

The Coalition received surveys from 86% of members required to complete the summary report, representing 90% of high vulnerability acreage as of June 22, 2018 (Table 1).

Table 1. Summary of acreage and member counts for received and not received 2017 NMP SRs.

SURVEY STATUS	SUM OF ACREAGE	COUNT OF MEMBERS
Received	405,201	2,442
Not Received	43,333	392
% RECEIVED	90%	86%

NMP SR data are included in the attached Excel workbook titled "ESJWQC_NMPSummaryStatistics_2017CY_070218". The data are aggregated by Township-Range and crop. Included in the data summary is the acreage and summary statistics for the amount of nitrogen applied compared to the amount of nitrogen removed (A/R and A-R) for crops with a nitrogen removed coefficient. If there is no nitrogen removed coefficient, the amount of nitrogen applied is compared to the reported yield (A/Y). Summary statistics include mean, standard deviation, minimum, maximum, and 10th, 25th, 50th, 75th, and 90th percentiles.

Farm Evaluation

Farm Evaluations for the 2017 crop year were mailed to all Coalition members. A small percentage of members (5%) were not required to complete an FE for one of three possible reasons:

1. the member had no irrigated acreage enrolled in the Coalition during 2017 (recently enrolled),
1. they did not farm in 2017, or
2. the member is no longer enrolled in the Coalition.

The Coalition received surveys from 88% of members, representing 94% of Coalition acreage as of June 26, 2018 (Table 2).

Table 2. Summary of acreage and membership counts for received and not received 2017 FEs.

SURVEY STATUS	VULNERABILITY	OVERALL VULNERABILITY ¹	SUM OF ACREAGE	COUNT OF MEMBERS
Received	Both SW and GW - High	High	398,014	1,254
	GW - High	High	161,929	1,228
	SW - High	High	69,481	197
	Both SW and GW - Low	Low	32,963	206
	Unknown	Unknown	1,216	22
RECEIVED TOTAL			663,602	2,907
Not Received	Both SW and GW - High	High	21,140	149
	GW - High	High	12,912	189
	SW - High	High	1,675	10
	Both SW and GW - Low	Low	6,961	29
	Unknown	Unknown	73	3
NOT RECEIVED TOTAL			42,761	380
GRAND TOTAL			706,363	3,287
% RECEIVED			94%	88%

¹ When one or more parcels in a membership is located in a surface or groundwater HVA, a survey was required for all parcels enrolled under the membership.

GW – Groundwater
 SW – Surface Water

FE data are included in the attached Access database titled "ESJWQC2017FEResults". The following information is included by Township-Range:

- a) Crop
- b) Pesticide, irrigation, nitrogen and sediment and erosion practices
- c) If there are any irrigation wells
- d) If there are any abandoned wells
- e) Well practices
- f) Acreage

"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 knowingly submitting false information, including the possibility of fine and imprisonment for violations."

This letter will be submitted with an original signature to the CVRWQCB.

Submitted respectfully,

A handwritten signature in black ink, appearing to be 'PK' with a long horizontal stroke extending to the right.

Parry Klassen

Executive Director

East San Joaquin Water Quality Coalition

Cc:

Susan Fregien, CVRWQCB

Yared Kebede, CVRWQCB

Michael Johnson, MLJ Environmental

Melissa Turner, MLJ Environmental