



August 24, 2017

Chris Jimmerson
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114
Sent via email at Chris.Jimmerson@waterboards.ca.gov

**Re: Comments on Nutrient Management Plan Summary Report from
San Joaquin County-Delta Water Quality Coalition**

Dear Mr. Jimmerson,

Thank you for the opportunity to comment on the draft Nutrient Management Summary Report from the San Joaquin County Delta Water Quality Coalition. We appreciate the significant amount of effort that went into the development of this document and the difficulties in collecting the required information for the first time. We understand that the accuracy of the data will improve in subsequent reports as additional outreach and education helps growers better understand how to provide the required information, and look forward to improved data quality in next year's report.

We think the report is generally well-laid out, provides relevant information in a clear and easy to understand format, and lays out some of the data restrictions that may have impacted the quality of the analysis. We particularly like the scatterplots in Figure 2 that show the ranges of nitrogen application for different crops, and agree that this is more useful than the breakdown by township and crop. We also appreciate that A-R information is provided for a majority of the acreage.

Having said that, we have some concerns about the information and the way in which it was provided, some of which can be addressed in this year's report and others which can be incorporated in future years.

- **The report covers the 2015 crop year.** We hope that this is an anomaly, and that the future reports will cover the most recent crop year.
- **The report does not allow the calculation of nitrogen loss by township.** The information on A-R by crop is useful, but isn't provided in a way that permits the calculation of nitrogen loading on a township level. We understand the importance of this report in providing information for coalitions and growers to compare nitrogen management efforts, but the report is also critical to help us understand potential nitrogen loading, and how that loading is hopefully being reduced over time. The use of A-R also permits the incorporation of nonyield crops into the



analysis, providing a more accurate measure of potential loading. We think that the information exists to calculate A-R on a township level for this crop year.

- **Management Units should use the same irrigation and nitrogen practices.** We were surprised to learn from this report that this coalition's (and perhaps every coalition's) definition of a management unit does not incorporate consistent irrigation and nutrient application practices. Specifically, the "Caveats" section on pages 27 states that "a single NMP MU can have an array of irrigation and nitrogen practices." We don't think it is possible to make accurate comparisons or analyses of data using management units that incorporate multiple irrigation and nitrate methods. We urge that this definition be narrowed in future reporting years and that this definition be standardized and clarified for all coalitions.
- **Township reporting is complicated by the use of management units.** The report authors chose an appropriate method to allocate management zones to the township containing the bulk of the management zone, thus avoiding duplication and overlap. The method does, however, have the downside of obscuring township size. Because townships are only listed under crop information, we can't get information on total township acreage from the report. If this data is available, we would appreciate receiving it.
- **More clarity on applied practices is needed.** We find the approach to analyzing practices interesting, but agree that the quality of the data that is currently available makes it difficult to draw conclusions about the efficacy of practices. We also strongly believe that irrigation method should be part of this analysis.

We look forward to working with the Board and the Coalition to improve the accuracy and usefulness of this report. Thank you for providing us the opportunity to comment.

Sincerely,

Phoebe Seaton
Leadership Counsel for Justice and Accountability

Deborah Ores
Staff Attorney
Community Water Center

Jennifer Clary
Water Policy Analyst
Clean Water Action