

ITEM: 7

SUBJECT: Status of Nitrogen Management Plan Template Development

BOARD ACTION: *Information Item Only.*

BACKGROUND: All growers regulated by the Board's Irrigated Lands Regulatory Program are required to prepare and implement a Nitrogen Management Plan (NMP). Growers in high vulnerability areas must get their NMP certified and submit an NMP Summary Report to the Third Party (Coalition) for the previous crop year. The ILRP Orders require growers to use a template that is approved by the Executive Officer.

The East San Joaquin Water Quality Coalition and other agricultural stakeholders submitted draft NMP and Summary Report templates to the Central Valley Water Board (Board) in April 2013. Around that time, the State Water Board's report to the legislature with recommendations for addressing nitrate in groundwater was released (http://www.waterboards.ca.gov/water_issues/programs/nitrate_project/docs/nitrate_rpt.pdf). Those recommendations included commitments to convene two groups that would weigh in on issues related to nitrogen tracking, reporting, and management, which led Board staff to delay the process to complete the NMP Template until those groups could provide their recommendations.

The California Department of Food and Agriculture (CDFA) convened a Nitrogen Tracking and Reporting Task Force to address nutrient management and water quality, and evaluate nitrogen data availability, tracking and reporting systems, along with recommendations of outreach, education, and research. The report the CDFA Task Force produced can be found at: <http://www.cdfa.ca.gov/environmentalstewardship/PDFs/NTRSTFFinalReport122013.pdf>.

The State Water Board convened a panel of experts to assess existing agricultural nitrate control programs and to develop recommendations to help ensure that regulatory efforts are protective of groundwater quality. The Expert Panel recommendations were presented to the State Water Board in September 2014 and can be found at: http://www.swrcb.ca.gov/water_issues/programs/agriculture/docs/ILRP_expert_panel_final_report.pdf.

On 6 October 2014, the Central Valley Water Board solicited comments on the NMP Template submitted by the Coalitions in April 2013. Though the Board had already provided an opportunity for comment on the NMP Template, Board staff felt it was important to provide another opportunity, given the new recommendations from the CDFA Task Force and the Expert Panel.

Board staff asked that comments focus on the Nitrogen Management Plan Template, which must be completed by many growers in early 2015. Board staff intends to solicit comments on the Nitrogen Management Plan Summary Report next year.

The Nitrogen Management Plans are kept on the farms unless specifically requested (e.g. as part of an inspection). The due dates for preparation of the first NMP range from 1 March 2015 to 1 March 2017. The specific due dates

vary by the Order the grower is covered under, farm size, and vulnerability area. Based on Board direction at this workshop and recommendations received from interested parties, Board staff intends to meet with the Coalitions to finalize the NMP Template. To allow adequate time for the growers to fill out the NMP and the Coalitions to work with their growers, the NMP Template approval should occur no later than 31 December 2014.

ISSUES:

Comments received on the NMP Template included the following issues:

- The Coalitions and other ag stakeholders submitted proposed changes to the April 2013 NMP. Their comments were only for the NMP Template and not the NMP Summary Report. One of the proposed changes is the removal of the need to provide information necessary to develop a ratio (i.e., amount of nitrogen supplied and credits over the amount of nitrogen a crop needs). In addition they provided "Example" nitrogen application and credit scheduling worksheet.
- Some of the language is vague or inconsistent, such as crop nitrogen "need" which may have different interpretations. Agronomic terms and reporting terms should be clarified.
- More time is needed to complete the NMP given the short timeframe between when the template will be available, when high vulnerability areas will be identified, and the due dates for high vulnerability areas.
- The NMP Template needs more guidelines regarding procedures for determining several of the important values required in the worksheet.
- The NMP Template ratio of N applied divided by N needed rather than N removed has little value when trying account for N loss to evaluate the potential impact to groundwater.
- The NMP Worksheet should include additional data needed to develop a more comprehensive evaluation of nitrogen applications and irrigation practices that impact N losses and groundwater quality.
- The Expert Panel recognized that there are knowledge gaps in key components of the NMP. For some crops, the degree of information required in the NMP may be inappropriate absent scientific support to justify data such as crop removal, and would only serve to generate inconsistent or meaningless data for regulatory purposes.
- For small and specialty crop growers that apply little or no nitrogen, completing the NMP component of the WDR would have no meaning.
- The NMP Template cannot be viewed in isolation from the Summary Report.
- Separate dairy manure and compost (as well as non-dairy exported manure/compost) to facilitate a cross check against reported manure exports reported under the dairy General Order.
- The nitrogen in irrigation water should reflect the total N applied in irrigation water, whether or not it is considered plant available. All N applied in

irrigation water is part of the field N mass balance.

RECOMMENDATION This is an information item only.

Mgmt. Review ___JK___

Legal Review ___PEP___

4/5 December 2014

Central Valley Regional Water Quality Control Board Meeting

11020 Sun Center Drive, #200

Rancho Cordova, CA 95670