
Central Valley Regional Water Quality Control Board

19 February 2015

Agricultural Water Quality Coalitions
[See Attached List]

THIRD-PARTY GROUP REQUIREMENT TO SUBMIT CROP NITROGEN KNOWLEDGE GAP STUDY PLAN

The purpose of this letter is to describe the requirements of Third-party Groups to prepare and submit a “Crop Nitrogen Knowledge Gap Study Plan” (or “Study Plan”). The requirements described below apply to all approved Third-party Groups administering Orders under the Irrigated Lands Regulatory Program, except for the California Rice Commission.

The 6 November 2014 comment letter from the coalitions on the Nitrogen Management Plan indicated that there are knowledge gaps that need to be filled to be able to calculate a nitrogen ratio. Although the final form of the ratio has not been established, both the California Department of Food and Agriculture’s Nitrogen Task Force and the State Water Resources Control Board Expert Panel recommend the ratio include the nitrogen removed from the field and sequestered by perennial crops. In addition, in testimony provided by your representatives at our 4 December 2014 board meeting, you indicated that you would be forming a Technical Advisory Workgroup to address these knowledge gaps.

In adopting the Irrigated Lands Regulatory Program Third-party Group Orders, the Central Valley Water Board anticipated that the monitoring and reporting requirements may not be sufficient to provide all information required to evaluate compliance with the Orders. Each of your respective Orders provides the Executive Officer with the authority to require third-party groups to produce technical reports to address information gaps.

I have concluded that the knowledge gaps identified by you and the State Water Board’s Expert Panel are critical deficiencies that must be addressed. Although we anticipate that you will work closely with academia and other experts, it is ultimately the responsibility of the third-party groups approved under the ILRP Orders and their Member growers to generate the information needed by the board to evaluate compliance with the ILRP Orders.

Therefore, per applicable provisions of your respective ILRP Orders, I am requiring you to provide the following¹.

¹ The required technical reports identified in this letter apply to third-party groups under the following ILRP Orders: R5-2012-0116 (section VIII.I.); R5-2013-0120 (section VIII.J.); R5-2014-0001 (section VIII.J.); R5-2014-0002 (section VIII.I.); R5-2014-0029 (section VIII.I.); R5-2014-0030 (section VIII.J.).

1. By 16 March 2015, please submit a detailed description of the Technical Advisory Work Group that you plan to convene, including a) the purpose of the Work Group; b) the questions or issues to be addressed by the Work Group; c) the composition of the Work Group.
2. By 18 December 2015, please submit or provide references to the guidance documents that growers and their certifiers are being directed to use in the preparation of the nitrogen management plan. The Nitrogen Management Plan includes several data fields that require the collection of information that could be done in an inconsistent manner, making data interpretation difficult. To ensure data are collected in a consistent manner the Coalitions must provide appropriate guidance to their growers. For example, the sample collection and calculation methods for key parameters such as nitrogen in water; soil; manure; and compost must be explained. If guidance documents are not available, then please provide a proposed time line and work plan for developing the appropriate guidance documents. The purpose of such guidance documents is to ensure that the information being provided in the nitrogen management plan template is of high quality and collected consistently.
3. By 18 December 2015, please provide a Crop Nitrogen Knowledge Gap Study Plan describing the current understanding of crop nitrogen uptake and removal, recommended methods for calculating nitrogen removal that will be provided to Member growers, and how any identified knowledge gaps associated with crop nitrogen uptake and removal will be addressed. At a minimum, the Crop Nitrogen Knowledge Gap Study Plan must identify: a) the current state of knowledge regarding crop nitrogen uptake/removal for Central Valley crops; b) the methodology(ies) that are currently available to estimate crop nitrogen removal; c) how study plan results (assessment of current understanding and knowledge gaps) will be disseminated to growers; d) a proposed workplan and milestone schedule for addressing any identified knowledge gaps and the rationale for any proposed prioritization; e) the relationship and associated timelines between the study plan, the Management Practices Evaluation Program, and the California Department of Food and Agriculture's Fertilizer Research and Education Program.

The required submittals will be posted on the Regional Board's website for public input. These requirements apply to each third-party group approved to represent growers governed by the ILRP Orders. However, the third-party groups may respond to these requirements collectively, by identifying the third-party group participants as part of the submittal due 16 March 2015.

If you have any questions regarding these requirements, please contact Adam Laputz at (916) 464-4726.

Original signed by

Pamela C. Creedon
Executive Officer

Central Valley Regional Water Quality Control Board

East San Joaquin Water Quality Coalition

Parry Klassen
1201 L Street
Modesto, CA 95354

Sacramento Valley Water Quality Coalition

Bruce Houdesheldt
Northern California Water Association
455 Capitol Mall, Suite 335
Sacramento, CA 95814

San Joaquin County & Delta Water Quality Coalition

Mike Wackman
San Joaquin County Resource
Conservation District
3422 W. Hammer Lane, Suite A
Stockton, CA 95219

Kings River Watershed Coalition Authority

Mark McKean
P.O. Box 8259
Fresno, CA 93747

Kaweah Basin Water Quality Association

Rick Borges
2974 North Farmersville Blvd.
Farmersville, CA 93223

Tule Basin Water Quality Coalition

David Gisler
2904 W. Main Street
Visalia, CA 93291

Kern River Watershed Coalition Authority

Eric Averett
P.O. Box 151
Bakersfield, CA 93302

Buena Vista Coalition

Tim Ashlock
P.O. Box 756
Buttonwillow, CA 93206

Cawelo Water District

David Hampton
17207 Industrial Farm Rd.
Bakersfield, CA 93308

Westside Water Quality Coalition

Greg Hammet
21908 Seventh Standard Rd.
McKittrick, CA 93251

Westlands Coalition

Jose Gutierrez
Westlands Water Quality Coalition
P.O. Box 6056
Fresno, CA 93703

Westside San Joaquin River Watershed Coalition

Earl Perez
San Joaquin Valley Drainage Authority
P.O. Box 2157
Los Banos, CA 93635

cc: Clay Rodgers, Central Valley Water Board, Fresno
George Day, Central Valley Water Board, Redding
Susan Fregien, Central Valley Water Board, Rancho Cordova
Amrith Gunasekara, California Department of Food and Agriculture