
Central Valley Regional Water Quality Control Board

29 March 2016

Agricultural Water Quality Coalitions
[See Attached List]

RESPONSE TO COMMENTS ON THE CROP NITROGEN KNOWLEDGE GAP STUDY PLAN AND GUIDANCE DOCUMENTS

Thank you for the 19 February 2016 letter responding to my 19 January 2016 comments on the "Crop Nitrogen Knowledge Gap Study Plan and Guidance Documents" (Study Plan). Your letter was submitted in response to concerns raised in the 19 January 2016 comment letter, as well as discussions between Board staff and the coalitions during our 4 February 2016 meeting.

Based on your letter, the coalitions will be utilizing all 17 of the California Department of Food and Agriculture's (CDFA) crop-specific nitrogen removed calculators to estimate nitrogen removed based on crop yield values obtained from their grower members. By July 2016, the coalitions will submit a work plan with a timeline to develop nitrogen removed calculators for additional crops and to further refine the existing nitrogen removed calculators.

The coalitions will use the nitrogen removed values, in conjunction with the grower submitted nitrogen applied values to calculate Nitrogen Applied/Nitrogen Removed (A/R) ratios for member crops. In addition to submitting the A/R information to the Central Valley Water Board in an aggregated manner, it is vital that the coalitions provide the individual A/R ratios to their members and utilize the information in grower education and outreach activities to provide feedback to each grower member about their nitrogen application and its potential to leach nitrogen to groundwater. However, the response letter did not include specific timelines for providing the A/R ratio to the coalition members.

Because it is important for growers to obtain timely feedback on their A/R ratios, the revised Study Plan must include proposed timelines to meet the following requirements:

1. Submit the summarized, crop-specific A/R ratio information to the Central Valley Water Board for the 17 listed crops during the initial reporting year. In subsequent years, newly added crop A/R ratio information shall be included in the summary.
2. Disseminate the summarized A/R information to all coalition members, and provide each coalition member with their specific A/R ratio in the context of other similarly situated operations. Where it is feasible, this information must be provided in time for growers to be able to make modifications to their initial nitrogen management plan (if needed) during the same year as implementation (i.e, growing season). This feedback mechanism will allow adaptive management based on the best available information regarding nitrogen removed and the grower's nitrogen use in the context of other similarly situated operations.

Therefore, I conditionally approve the revised study plan, contingent upon receiving acceptable timelines to meet the above-mentioned requirements. The A/R summary and statistical information must be provided to each coalition member (tables, figures and/or charts), with the particular grower's A/R ratio(s), so that the member can identify where they fall within the average or median A/R ratio for each of their crops.

If you have questions regarding these requirements, please contact Sue McConnell at (916) 464-4798 or sue.mcconnell@waterboards.ca.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Pamela Creedon", with a long horizontal flourish extending to the right.

Pamela C. Creedon
Executive Officer

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cc: Clay Rodgers, Central Valley Water Board, Fresno
Clint Snyder, Central Valley Water Board, Redding
Amrith Gunasekara, California Department of Food and Agriculture, Sacramento