



Subject: Harris Woolf Ca. Almonds TWDR's
11805 Newport Rd. Ballico, Ca. 95303
Date: April 8, 2014

After a Brief Review of the WDR and related documents I have the following comments:

Information Sheet:

Proposed Discharge:

In the proposed discharge you comment that "it will add up to 217 lbs. per acre of nitrogen and the almond trees require 218 lbs" The 10 acres of trees are mature almond trees, so Harris Woolf will need to budget to replace those trees to ensure the uptake of nitrogen and/or implement additional nitrate removal systems. This may include the installation of a "Biofilter" system consisting of red worms and worm castings. It may also include the planting, cutting and removal of various grasses to enhance nitrogen removal from discharge area.

Ground Water Conditions:

In paragraph 5 the statement that " The results in MW-2 indicate that the discharge in combination with the fresh water used to irrigate the 10 acre LLA appears to be actually improving groundwater quality down gradient of the LLA." Indicates we are a positive impact on the ground water and should be pointed out at the June hearing if there are issue with the permit getting approved.

Monitoring and Reporting Program:

For the monitoring of the ponds and the effluent the Regional Board will require a monitoring program for samples on a daily, weekly, monthly, quarterly for the Effluent, Groundwater, Source Water and Land Application with semi-annual reports in August and February will this be what we currently do in house plus though our consultants? What is new?

Waste Discharge Requirements:

Paragraph# 1 Page 1:

Eliminate the inaccurate reference to HW as "a division of Woolf Farming of California Inc., a California Corporation." The Ballico California facility is no longer considered a separate division.

F. Provisions Pages 18 and 19:

11. & 12. The Board will require a Salinity Management Plan and a Nutrient Management plan within 6 months of approval of the permit. Should HWCA write and submit the plan or is this in conjunction with existing testing and reports being performed by 3rd party?

Brad A Brown

A handwritten signature in blue ink that reads "Brad A Brown".

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