Almond Alliance
OF CALIFORNIA

May 7, 2018

Karl Longley, Ph. S, Chair
Pamela Creedon, Executive Officer
Regional Water Quality Control Board,
Central Valley Region (Region 5)
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670
Via email to glenn.meeks@waterboards.ca.gov

RE: Comments on and support for adoption of *Amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basin and Tulare Lake Basin (Basin Plans) to Incorporate a Central Valley-wide Salt and Nitrate Control Program*

Dear Chair Longley and Ms. Creedon:

The Almond Alliance of California (the Alliance) would like to express its support for adoption of the proposed amendments to the Basin Plans.

The Alliance is an association representing the California almond industry and is organized to promote the interests of its members. Our members represent over 80% of the California Almond industry based on volume. The Alliance works closely with the Almond Board of California (ABC) to provide regulators with a better understanding of how specific issues impact the California almond industry. The ABC is a grower-enacted Federal Marketing Order under the supervision of the United States Department of Agriculture representing over 6,800 almond growers and 100+ almond handlers. Virtually all of these growers are located within the Central Valley and thus will be subject to these proposed regulatory changes.

The ABC engages in production/environmental research to support almond growers and handlers as well as carrying out a broad-based market development program to create demand in domestic and international markets. Research data and industry facts generated by the ABC have been incorporated into these comments.

The Central Valley Salinity Coalition (CVSC) is a stakeholder group formed in 2008 to provide financial support and stakeholder input toward developing the proposed amendments. CVSC membership includes many Irrigated Lands Regulatory Program (ILRP) coalitions that also include and represent almond growers within their respective regions. CVSC supports the adoption of the proposed amendments to the Basin Plans, and they have submitted additional comments and clarifications to the draft amendments. We support the CVSC comments and incorporate them by reference.

The proposed amendments provide an essential framework for the survival of agriculture in the Central Valley, one that protects our vital agriculture economy while creating mechanisms to provide safe drinking water for all Central Valley residents. The amendments also begin the process for addressing management of salinity buildup in Central Valley soils and aquifers. Implementation of these amendments will lead to a better, more sustainable future for all Central Valley residents, and assurance that agriculture can remain an important part of the valley's culture and economy for generations to come.

The regulatory flexibility incorporated in these amendments is vital to the almond industry and most of Central Valley agriculture. Current regulations provide Regional Water Quality Control Board (Regional Board) with extremely limited options when water quality objectives (WQOs) in shallow groundwater are exceeded – even if growers are taking all reasonable steps to meet the WQOs by complying with all other permit conditions and implementing good management practices. The proposed amendments would allow the Regional Board to permit growers to continue farming when, through no fault of their own, it is impossible or infeasible to comply with WQOs – so long as growers participate with other dischargers in efforts to ensure a safe drinking water supply. Importantly, growers are not forced to participate in such efforts, but are given the opportunity do so when they judge it to be within their best interests. This creates a win-win option, to help ensure that Central Valley residents have access to safe drinking water ***and*** the economic benefits of a thriving agricultural economy.

Access to the proposed regulatory options is particularly important to the portions of the almond community that are in areas where groundwater levels of nitrate already exceed the WQO; we estimate that approximately 15 percent of California's almond orchards are in such basins.[1]

Almond growers have invested in improved nitrogen management

Long before these proposed regulatory changes, almond growers were already partners with the Regional Board in improving water quality and reducing impacts of nitrate in groundwater. Through the ABC, almond growers continue to invest in research and outreach on how to improve nitrogen management in almonds – with a focus on improving efficiency and reducing off-site movement of nitrogen compounds. ABC funded six years of research ($256,000) with Dr. Patrick Brown of the Department of Plan Sciences at the University of California Davis, to revisit the actual nitrogen demand in almonds under current growing practices and yields. That research has led to a refined understanding of nitrogen (N) demand for mature almond trees, accounting for the N removed with harvest (kernel, hull and shell) along with N needed for the tree itself. The research refined the ability of almond growers to assess whether their N management is on track by developing a way to assess plant N status in April, rather than July, at the end of the main N uptake period. The study refined almond growers' understanding of when their trees take up nitrogen from the soil. This information was combined into a nitrogen budgeting tool available to almond growers via the ABC's website. ABC also funded separate research projects looking at both nitrate leaching and nitrous oxide emissions as part of the larger Brown project.

More recently, with initial funding from a California Department of Food and Agriculture Fertilizer Research and Education Program grant to several University of California professors (D. Smart, P Brown, J Hopmans, T Harter), ABC continues to fund research into whether changes in a grower's nitrogen

[1] Based on estimates from Land IQ.

management also changes the amount of nitrous oxide emissions as well as nitrate available for leaching to groundwater. That project is now in its fourth year, with $400,000 invested to date, and monitoring will continue for several more years.

Thank you again for the opportunity to comment on and support adoption of the proposed regulatory amendments.

Sincerely,

Andrea Harvey-York

Andrea Harvey-York
Manager, Government Relations
Almond Alliance of California