



Submitted electronically to commentletters@waterboards.ca.gov

August 13, 2018

Jeanine Townsend,
Clerk to the State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, California 95814

Re: **SUPPORT FOR ADOPTION** of proposed approval of amendments to the Water Quality Control Plans for the Sacramento River and San Joaquin River Basins and the Tulare Lake Basin to incorporate a Central Valley-wide Salt and Nitrate Control Program

Dear Ms. Townsend:

Dairy Cares appreciates the opportunity to comment on the above-referenced matter. Formed in 2001, Dairy Cares (www.dairycares.com) is a coalition of California's dairy producer and processor organizations, including trade associations representing dairy farmers (*California Dairy Campaign, California Farm Bureau Federation, Milk Producers Council and Western United Dairymen*), other cattle ranchers (*California Cattlemen's Association*), milk-processing companies and cooperatives (including *California Dairies, Inc., Dairy Farmers of America-Western Area Council, Hilmar Cheese Company, and Land O' Lakes, Inc.*), and others with a stake in the long-term environmental and economic sustainability of California dairies.

Dairy Cares strongly supports adoption of the proposed Basin Plan Amendments (BPAs).

The proposed BPAs represent a comprehensive, long-term strategy to improve and protect water resources across the Central Valley. The BPAs will provide near-term access to clean drinking water for thousands of valley residents who need it, while creating more workable options for regulators, so they can achieve greater benefits to all through the permitting process. The proposal carefully balances interests of diverse stakeholders, containing a thoughtful strategy for immediately addressing urgent priorities while laying groundwork for longer-term actions necessary to ensure the Central Valley's long-term economic and environmental health.

Dairy Cares participated closely in the broad stakeholder process, overseen by the Central Valley Regional Water Quality Control Board (hereafter "Regional Board"), to develop the proposed BPAs. We appreciate the participation of all stakeholders in the decade-long process to develop this strategy for addressing salinity and nitrates across the valley, to protect the drinking water resources we all share, and to ensure a viable agriculture economy now and in the future. We

believe this stakeholder process was essential to developing workable BPAs, as it required stakeholders to work together from the very beginning to understand our shared challenges and come together with solutions that address the needs of all.

The process involved significant give and take, and no one group achieved everything they would have hoped for in the process. But we believe the ultimate product, the proposed BPAs, delivers a balanced package of new benefits, new responsibilities and a better future to all. In the case of dairy farms, the BPAs will result in increased costs and responsibilities. However, the BPAs also draw a path to a more stable and sustainable future for dairies, where performance goals are reasonable and achievable, improved performance over time is encouraged, future business conditions are more predictable, and liability is more manageable.

Stakeholders represented a broad array of interests, from agricultural coalitions and irrigation districts to cities, publicly owned treatment works, environmental justice groups, food processors, the oil and natural gas industry, and more. As a member of the Central Valley Salinity Coalition (CVSC), which raised more than \$3 million from its members, Dairy Cares assisted in funding technical studies and providing technical, legal and administrative support to the stakeholder process; further, Dairy Cares donated hundreds of hours of staff time.

We further appreciate the strong support for this process from the State Water Resources Control Board (“SWRCB”) itself, which along with the CVSC, invested in technical studies necessary to identify problems and support the proposed solutions.

Finally, we note that adoption of the proposed BPAs is an extremely important step, but there is much work to do to ensure successful implementation. Dairy Cares is committed to continued work through the CVSC and within the dairy community to ensure successful implementation of the BPAs. This will be a years-long process requiring continued commitment from all stakeholders. We appreciate the SWRCB support to date, your consideration and adoption of these BPAs, and look forward to continuing to work with you in the future.

Sincerely,



J.P. Cativiela
For Dairy Cares

C: Michael Boccadoro, Executive Director, Dairy Cares
Paul Sousa, Environmental Services Director, Western United Dairyman
Kevin Abernathy, Executive Director, Milk Producers Council
Lynne McBride, Executive Director, California Dairy Campaign