



Agricultural Council
of California

Waste Discharge Requirements

January 22, 2013

Committee Work:

- One formal meeting on Nov. 28;
- 87 participants on official committee;
- Additional outreach conducted with minimal feedback;
- Still getting anecdotal information.

Overarching Themes from Meetings & Correspondence:

- If we simplify the process enough, staff can take a targeted approach by focusing on bad actors, encouraging technology and improving the environment;
- New regulations and revisions must be outcome-oriented vs. process-based;
- Compliance for this permit is immensely complex;
- No call for relaxation of environmental standards.

Examples of Excessive Costs of Compliance:

- Sampling & Reporting;
- Creation of Plans;
- Creation of Annual Report;
- CDFA's 2010 study of dairies:
 - Approximately \$15K per 1000-cow dairy.

Outstanding issues of existing regulations:

- Annual Report is not useful in current form;
- Enforcement actions should focus on improving the environment rather than paperwork violations;
- If an entity has a nutrient management plan + a waste management plan, and standards for these reports are met, are there additional requirements necessary for the purpose of law? What are the benefits provided by the other reports?

Suggestion for changes:

- Create representative sampling programs for industries or watersheds that do not already have them;
 - Be strategic in frequency & locations of sampling;
- Annual Report should be a tool for environmental management;
- Self-monitoring with spot-checks as opposed to required data collection;
- Field trips for staff to gain better understanding of issues, existing and emerging technology;
- Ombudsman or somebody in each agency trained to understand regulations in other agencies;
- Electronic permitting process.

Next steps:

- Document compliance costs for industries & regions not already documented;
- Suggest strategies for representative sampling & improved sampling strategies in other areas;
- Seek out long-term solutions;
- Reevaluate fee schedule so that it is consistent with workload, once changes are implemented.

Questions?

Emily Rooney, Ag Council
(916) 443-4887

Bob Gore, The Gualco Group
(916) 441-1392