



Western Riverside County Agriculture Coalition

January 18, 2013

Mr. Steve Mayville
Regional Water Quality Control Board
3737 Main Street
Suite 500
Riverside, CA 92501-3348

Re: Order No. R8-2013-0001 General Waste Discharge Requirements for Concentrated Animal Feeding Operations (Dairies and Related Facilities) Within the Santa Ana Region
Comments on the Draft Permit

Dear Mr. Mayville,

The Western Riverside County Agriculture Coalition (WRCAC) has reviewed the draft permit following the Board workshop. We understand that there are current cases regarding antidegradation and backsliding that need to be addressed before moving forward and that at the time of this writing, the issues are unresolved. Per your request as of 1/14/13, WRCAC is submitting other comments on the permit to assist the Santa Ana RWQCB to move this process along. However, we reserve the right to submit additional comments once the additional issues of concern have been addressed.

WRCAC believes the current methodology for reporting/posting documents is acceptable. Most dairy operations are at the location of the dairy operators' home. Posting on the RWQCB website documents with family residence addresses would not be ideal. Unlike other businesses, the dairy farm operations and residence are typically the same. We suggest that the current process for posting is acceptable and not intrusive to the dairy operator families.

Please add agricultural –related to General Provisions D.2. before special studies for the San Jacinto River Basin. It was added to the Middle Santa Ana Basin in D.1 but not in D.2 (page 17)

Please correct the last 2 paragraphs of 3b. of the Middle Santa Ana TMDL Bacterial monitoring requirements. (Attachment D, page 13)

The information provided in the last paragraph is the Urban/MS4 Comprehensive Bacterial Reduction Plan (CNRP). This is not the Ag required information. Please refer to the following for correct information:

The agricultural dischargers are required to develop and implement a Bacterial Indicator Agricultural Source Management Plan under Task 5.2. Regional Board staff has identified non-CAFO agricultural operators (October 2012). The CAFO facilities continue to participate and cooperate in the TMDL Task Force activities related to the Middle Santa Ana River Bacteria Indicator TMDL thru the taskforce watershed wide monitoring program since 2007.

The CAFO/agricultural community developed and implemented a Bacterial Indicator Agricultural Source Evaluation Plan (AgSEP) that was approved by the RWQCB in 2008. Implementation of the plan included a wet weather monitoring program, completed in 2009 by Brown and Caldwell.

A Scope of Work (SOW) for the Bacterial Indicator Agricultural Source Management Plan (BASMP) has been developed and will be presented in spring of 2013 for funding. The agricultural community expects to complete the BASMP by 12/31/13.

WRCAC in a joint effort with Milk Producers Council (MPC) continues to create viable environmental solutions for the CAFO community in both the Middle Santa Ana and San Jacinto River Basins. Clearly, in these difficult economic times for the dairy industry, this is a considerable challenge. It is a challenge to be model environmental stewards and maintain a sustainable business practice. WRCAC will continue to pursue answers for additional scientific data regarding salt offset issues, groundwater science and data on new innovative technologies while synchronizing efforts on these topics to further develop the CWAD program, a meaningful AgNMP and continued BMPs and implementation of projects for the MSA bacterial TMDL and the San Jacinto Nutrient TMDL.

Sincerely,

Pat Boldt on Behalf of Bruce Scott
Chairman, WRCAC