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January 18, 2013

Stephen D. Mayville
Santa Ana Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501

Sent via e-mail to: smayville@waterboards.ca.gov

Regarding: General Waste Discharge Requirements for Dairies, Order No. R8-2013-0001

Dear Mr. Mayville:

Western United Dairymen (WUD) is the largest dairy producer trade association in California, representing approximately 60% of the state's milk production. WUD works on behalf of our member dairies to assist them in a variety of areas, including environmental issues.

Dairy families are currently struggling through the most difficult economic period in recent history. The costs of inputs to the dairy, specifically feed, have been at levels not witnessed before. This, combined with development pressure in the Santa Ana Region, has seen the number of families leaving the industry or moving out of the region climb in recent years. The industry does not possess the financial wherewithal to take on additional regulation at this time. Board and dairy producer resources should be optimized to protect water quality and to do so efficiently. We believe that this Order meets that requirement. We do however have some comments on how the Order could be modified or improved.

The Order should contain a list of definitions which would include the acronyms used in the Order. This would help clarify the meaning of some terms. The Engineered Waste Management Plan (EWMP) and its associated Nutrient Management Plan (NMP) are site specific. The information, test results and best management practices implemented are best used in relation to the specific dairy. This should be done at the site where a visual picture of the entire operation can be observed.

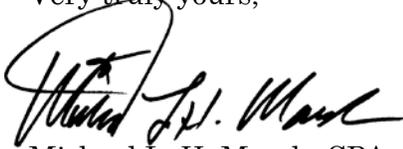
WUD also supports the continued efforts of WRCAC in its involvement in the Middle Santa Ana and the San Jacinto River Basins to develop and explore environmental solutions for the local agricultural community.

The Regional Board has the opportunity with this General Order to continue water quality protection in the Santa Ana Region while demonstrating to agricultural business owners who provide jobs and nutritious food that it too is striving for efficiency. The requirements

in the General Order should provide a clear benefit to water quality and necessary information to the Regional Board, and assist the dairies in managing their manure. In addition, these requirements must provide benefits that outweigh their costs. We believe that the staff has met this challenge with this Order and Western United Dairymen supports the adoption of the General Order. However, WUD understands that late revisions might be made to the Order after the public comment period closes and we would like the opportunity to comment on the revised Order if significant changes are made.

We again thank you for the opportunity to comment and appreciate the work that the staff of the Regional Board has put into the General Order. If you have any questions, please contact Paul Sousa of our staff at (209) 527-6453.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael L. H. Marsh". The signature is stylized with a large, looping initial "M" and a cursive style throughout.

Michael L. H. Marsh, CPA
Chief Executive Officer

cc: Paul Sousa, Director of Environmental Services