



CCOF

Organic Certification

Education & Outreach

Political Advocacy

Promotion

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive #200
Rancho Cordova, CA 95670

April 4, 2017

Re: Comments on Bovine General Order

Dear Members of the Central Valley Water Board,

Thank you for considering the following comments from CCOF regarding the Waste Discharge Requirements General Order for Confined Bovine Feeding Operations.

CCOF advances organic agriculture for a healthy world. We advocate on behalf of our members for organic policies, support the growth of organic through education and grants, and provide organic certification that is personal and accessible. Founded in California more than 40 years ago, we are supported by an organic family of farmers, ranchers, processors, retailers, consumers, and policymakers.

CCOF appreciates the complexity of water regulations in California and the numerous factors the water board must weigh in developing these rules. Certified organic dairies have unique attributes that can make it a challenge to meet “one size fits all” regulations that are tailored to conventional production systems. Organic dairy farmers are held to strict federal production standards which require that animals be grazed rather than confined. Another major difference between organic and conventional production is that synthetic pesticides including herbicides are prohibited on organic farms. Since California is the top organic dairy producing state in the nation, CCOF urges the water board to take these unique traits into consideration when finalizing the bovine order.

Specifically, we have identified two areas of the proposed Bovine General Order that might pose unnecessary challenges to certified organic dairies if not modified in the final order:

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1. Attachment B—Waste Management Plan, section E number 5 re: wastewater ponds: This section of the regulation specifies that Standard Operating Procedures should include a schedule to “identify and remediate problems related to ... excess weeds, algae, and vegetation.” It is not realistic to expect organic farmers to maintain bare ground around their lagoons because organic farmers are prohibited from using synthetic herbicides, making weed management time-consuming and expensive. Maintaining mowed vegetative cover on lagoon berms and embankments is a recommended practice in many parts of the country,¹ and we request that the water board allow organic dairies to maintain vegetative cover on the sides of their wastewater ponds.

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2. Certified organic dairy producers are required to graze their cows instead of confining them. A minimum of 30% of a cow’s dry matter intake must come from pasture over the course of the grazing

¹ See, for example, Pfost, D.L., and C.D. Fulhage. 1993. Lagoons for Storage/Treatment of Dairy Waste. Univ. of Missouri Extension; Mukhtar, S. 1999. Proper Lagoon Management to Reduce Odor and Excessive Sludge Accumulation. Texas Agricultural Extension Service.

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season, and many organic dairies in California far exceed this pasture requirement. Because of the pasture mandate, organic dairy cows spend much of their time on pasture and do not deposit as much manure in corrals as conventionally managed cows do. Because of this, certified organic dairies may be a good fit under the rules for Limited Time Operations. We encourage the water board to consider expanding the application of Limited Time Operations to certified organic dairies.

Certified organic dairies go to great lengths to comply with not only local and state regulations, but a rigorous set of federal organic standards that, in addition to the pasture and materials restrictions mentioned above, require them to be inspected annually to demonstrate their compliance. We thank you for keeping in mind how best the bovine general order can best match the unique attributes of this significant and growing part of California's dairy community.

Sincerely,



Jane Sooby
Senior Policy Specialist

cc: Cathy Calfo, Executive Director and CEO
Kelly Damewood, Director of Policy and Government Affairs