



Via email to charlene.herbst@waterboards.ca.gov

April 5, 2017

Charlene Herbst

Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

Re: Comments on [Tentative] "Waste Discharge Requirements General Order for Confined Bovine Feeding Operations" (hereafter "Tentative Order")

Dear Ms. Herbst:

On behalf of the family dairy producer members of the California Dairy Campaign (CDC), we write to raise our concern about the impact of the Tentative Order on facilities subject to the order as well as the increased costs it will raise for dairy operations across the state.

The challenging financial conditions facing dairy operations in California are evident from a review of the "California Dairy Statistics Annual" report published by CDFA; at the end of 2016 there were 1392 dairies in California and the average herd size totaled 1249 cows. The average price paid to dairy producers in California totaled \$15.03 per cwt in 2016, and the report pointed out that the lowest prices occurred in May at \$12.89 per cwt. Compared to five years ago the number of dairies has decreased by 276 dairies, but the average price paid five years ago in 2011 totaled \$18.52, more than 20 percent higher than average prices paid in 2016. Prices today remain well below average production costs and there is a great deal of uncertainty about milk pricing in the future.

Throughout 2016, California dairy producer income failed to cover average milk production costs. Dairy farmers are price takers, not price setters, and are not able to pass on additional costs which, makes equitable pricing regulations all the more important in our state. Dairy producers in California simply cannot afford to be paid some of the lowest mailbox prices in the nation and yet at the same time be subject to some of the highest regulatory costs. The California dairy industry supports 189,000 jobs including 55,000 milk production and processing jobs and the closure of dairies and the downturn in milk production has and will jeopardize jobs across the state.

We greatly appreciate your attention in this regard.

Sincerely,

Joe Augusto
President

P.O. Box 2044 – Turlock, CA – Office: (209) 632-0885 – Fax: (209) 632-0706

www.californiadairycampaign.com

CDC 1