



CALIFORNIA LIVESTOCK AUCTION MARKETS ASSOCIATION

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

April 7, 2017

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

Re: Comments on "Waste Discharge Requirements General Order for Confined Bovine Feeding Operations" Order R5-2017-0000

Dear Ms. Herbst:

On behalf of California Livestock Auction Markets Association (CLAMA), we are providing comments on the above-referenced tentative order. CLAMA is the voice of the livestock marketing industry in California and represents 20 livestock auction markets in the state.

CLAMA 1 **Economic Impact.** One of our biggest concerns is the financial burden that will be placed on the livestock auction markets. Livestock auction markets are already heavily regulated and the cost of doing business is substantial. The added cost associated with complying with this order will make it that much more difficult to do business in CA.

CLAMA 2 **The proposed implementation timeline remains far too aggressive.** We propose a more reasonable timeframe that properly takes into account the previously unregulated nature of this sector, lack of experience of livestock auction market owners with awareness of this level of regulatory intervention, lack of an established education-and-outreach arm for this sector, and lack of current and complete data about the regulated entities. This timeline also does nothing to provide time for regulated operations to spread necessary costs over multiple budget years.

Below are comments and suggestion on specific sections of the order:

CLAMA 3 **3.** Existing facilities are those that were operating as of (the date the order is adopted). New facilities are those that were not yet operating as of (the date the order is adopted).

4.

CLAMA 4

a. House bovine animals for fewer than 24 days per calendar month and remaining days of month do not exceed 10% of capacity. With a 90% vacancy for approximately 25% of the month, routine maintenance will be performed. With minimum populations, the cattle can be rotated around the facility.

CLAMA 5

b. Exports all manure/wastewater or, if manure/wastewater is applied to Discharge's cropland, the cropland...

CLAMA 6

e. Stores storm water runoff... ADD: With the exception of incidental water generated from sanitization for bio security purposes.

13. For "existing" facilities, the NOI shall document an existing herd size which is defined as the maximum number of bovine animals....housed at the facility in a single month period that occurred in the three years immediately prior to the issuance of the tentative Order...

CLAMA 7

Comment: Auction market populations vary by type and head count from day to day. Each market has a sale schedule that targets a particular class of cattle. The population also is dependent on seasonal demands, weather, and market trends. Thus, identifying type and head numbers would be difficult and should be reevaluated for auction markets. Perhaps size of housing area classification would be appropriate (i.e. small, medium, or large).

K. 1. b. Operation and Maintenance Plan for Limited Time or Limited Population Operations.....and a Limited Time Operation shall submit an Operation and Maintenance Plan as specified in **Section F** of Attachment B.

Attachment A – Notice of Intent

CLAMA 7

Type of Animals and Size of the Operation – Use number of pens and area of housing (see item 13

CLAMA 8

above) for auction markets. Auction markets would prefer to be assessed an annual flat fee.

CLAMA 4

F. 4. a. Check 24 day language per comments regarding limited time operations (item 4. a. above).

Attachment B – Waste Management Plan

2nd Paragraph: Confined Bovine Feeding Operations.....Operation and Maintenance Plan containing information described in sections F and **G/H** of this attachment.

Please check lettering system for listed items. There appear to be two "F" sections.

Thank you for the opportunity to provide comments on this Tentative Order. We look forward to working with you and if you have any questions or concerns, please don't hesitate to contact us.

Sincerely,

Alana McGill, President
California Livestock Auction Markets Association