

**STATE WATER RESOURCES CONTROL BOARD
EX PARTE COMMUNICATIONS REGARDING PENDING GENERAL ORDERS
DISCLOSURE FORM**

*Note: This form is intended to assist the public in providing the disclosure required by law. It is designed to document meetings and phone calls. Written communications may be disclosed by providing a complete copy of the written document, with attachments. Unless the board member(s) provided you with a different contact person, please send your materials to: commentletters@waterboards.ca.gov
Use of this form is not mandatory.*

1. Pending General Order that the communication concerned:

General Waste Discharge Requirements for Composting Operations

2. Name, title and contact information of person completing this form:

Note: Contact information is not mandatory, but will allow the Water Board to assist you if additional information is required. If your contact information includes your personal residence address, personal telephone number or personal email address, please use a separate sheet of paper if you do not want that information posted on our website. However, this information may be provided to members of the public under the Public Records Act.

Justin Oldfield, Vice President, Government Affairs, California Cattlemen's Association

3. Date of meeting, phone call or other communication:

June 16, 2015

Time:

15:25

Location:

n/a

4. Type of communication (written, oral or both): **Written**
5. Names of all participants in the communication, including all board members who participated:

Dorene D'Adamo

6. Name of person(s) who initiated the communication:

Justin Oldfield

7. Describe the communication and the content of the communication. *Include a brief list or summary of topics discussed at the meeting, any legal or policy positions advocated at the meeting, any factual matters discussed, and any other disclosure you believe relevant. The Office of Chief Counsel recommends that any persons requesting an ex parte meeting prepare an agenda to make it easier to document the discussion properly. Attach additional pages, if necessary.*

See attached.

8. **Attach a copy of handouts, PowerPoint presentations and other materials any person used or distributed at the meeting. If you have electronic copies, please email them to facilitate web posting.**

Justin Oldfield

From: Justin Oldfield
Sent: Tuesday, June 16, 2015 5:26 PM
To: 'Dadamo, Dorene@Waterboards'
Subject: Compost

Importance: High

Hi DeeDee,

I just wanted to check in on the compost hearing today. For some reason I had the hearing on my calendar for 9-12. The hearing ran up on some other legislative meetings I had scheduled so I've asked J.P. with Dairy CARES to speak on my behalf.

As I mentioned, we are simply asking for the general order to exempt facilities with compost operations that are already covered under a separate general order of which the total facility, including the compost yard, is covered. In addition, if the order could also recognize that facilities that come under a separate general order within the six years following the adoption of the SWRCB general order that those facilities also become exempt once they are covered under a separate general order. Our feedlots in the Imperial Valley are already enrolled in a general order with the Colorado River Basin Regional Water Quality Control Board however our folks in the Central Valley are awaiting further action on the development of a general order that will cover feedlots, calf ranches and other livestock facilities that are not dairies. Their website even recognizes their intent to do this by stating "...Central Valley Water Board staff plans to draft General Waste Discharge Requirements for feedlots and for poultry facilities."

I met with staff last week and they stated that Finding 13 covers our concerns. I respectfully disagree considering there are several caveats associated with Finding 13. Just as an example, the language seems to infer that individual facilities must be exempted separately rather than just simply stating that facilities under a general order that include the compost operation are exempt. I think this will create a lot of additional work for Regional Board staff and provides far less certainty to our folks that they will not be under duplicative orders. I also think there is ambiguity in the language because it states that the general order must be "comparable." Who determines that? Our feedlots are designed to appropriately manage dry manure which includes composting as a mitigation tool. Requiring a feedlot to meet specific compost facility standards will likely cause them to revert back to managing raw manure which I think is counterproductive and certainly not within the framework of the Governor's healthy soils initiative.

We would be able to have a much more productive conversation on this proposed general order if the language in Finding 13 was amended to simply state something representative of what I've written below.

"If a composting operation is co-located at a landfill or other facility that has individual WDRs or falls under a separate general order, the composting operation does not need to be covered under this General Order. Additionally, existing composting operations co-located at a landfill or other facility within six years of filing a Notice of Intent become enrolled in a separate general order are exempt."

Please let me know if you have any thoughts or suggestions on how we might further progress on this issue prior to the hearing on July 7.

Thanks!

Justin

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