Irrigated Lands Regulatory Program
Costs of Compliance

April 9, 2013
Stakeholder Group Meetings

- All stakeholder meeting held February 20th.
- Core group has met regularly & continues reaching out to larger Ag. community.
- Continue to collect actual costs incurred by farmers.
Overview

- Evolving ILRP in multiple regions.
- Significant changes to the Central Valley & Central Coast programs that both stakeholders & program staff are navigating.
- Lessons will be learned as program matures.
- Geographical & commodity diversity present challenges unique to the ILRP.
Cost Impacts

- SWRCB fee from 12¢/acre to 56¢/acre.
- Coalition fee from $1/acre to $6/acre.
- Paperwork costs.
- Management Practices.
Cost Impacts

➤ $50 million in the Central Valley for monitoring.
➤ $200,000 in the Central Coast to develop the agricultural proposals.
➤ Addition of groundwater is doubling costs.
➤ ESJWQC has doubled their per acre fee.
➤ $4/acre to $620/acre range in the Central Coast.
➤ Growers are hiring consultants to complete necessary compliance paperwork.
CVRWQCB noted “most of the estimated cost of $30 to $189/acre for farmers implementing the groundwater program in the Tulare Lake Basin will be due to investment in additional management practices.”
Moving Targets

- New groundwater elements
- TST
- CV-SALTS
- Biological Objectives
- Nitrates in drinking water recommendations
Recommendations

- Interpretation of Porter-Cologne and the Clean Water Act is inconsistent statewide on the ILRP.
- We support best mgmt. practices, treatment, and control pilot projects in determining if new regulatory standards are achievable.
- Is agency duplication necessary? Example would be DPR’s Groundwater Protection Program and how their expertise helps.
Recommendations

- Independent economic analysis should be incorporated in the ILRP regulatory process.
- Conflicts between water quality and food safety regulations and practices.
- SWRCB should prioritize common recommendations amongst the stakeholder groups.
- Develop implementation plan around those common themes.
Economic Analysis Tools

- U.S. EPA
  *EPA Tool Helps Estimate the Affordability of Water Pollution Control Requirements*

- Cal Poly
  *An estimation of the regulatory cost on Ca. Ag. Producers*

- Economic & Cost Analysis of the Central Coast Ag Order & Ag Alternative
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Questions?

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