



DEPARTMENT OF ANIMAL SCIENCE  
ONE SHIELDS AVENUE  
DAVIS, CALIFORNIA 95616.8521  
TELEPHONE: (530) 752.1250  
FAX: (530) 752-0175



September 18, 2014

Felicia Marcus, Chair  
State Water Resources Control Board  
1001 "I" Street  
Sacramento, CA 95814

Re: 9/23/14 BOARD MEETING, Item 8, "Consideration of a proposed resolution adopting emergency regulations revising the core regulatory fee schedules..."

Dear Chair Marcus and members of the State Water Resources Control Board,

You will no doubt receive input on the proposed fee schedules for dairies. Please consider the following information as you deliberate on the schedule for dairies and other confined animal facilities.

The California Dairy Quality Assurance Program (CDQAP) is a collaborative effort by the dairy industry, the University of California, and state and federal regulatory agencies. This is a partnership in the truest sense. Cal EPA and SWRCB were original signatories to this program in 1998 and have invested thousands of human hours in CDQAP compliance assistance education. Continued dairy producer education and certification are critical to all of us as stakeholders to improve environmental stewardship. Regulations do not protect the environment independent of education and implementation. Producers must understand and embrace environmental requirements before they can be implemented. A strong environmental outreach and education program is essential for continued future environmental improvement.

The concept of Environmental Stewardship Education/Certification was developed over years and countless hours of discussion. Staff from SWRCB, Regional Water Quality Control Boards (RCWQCB) (1,2,5,6 and 8), California Fish and Game, US EPA, County environmental regulatory agencies, California Department of Food and Agriculture, USDA Natural Resources Conservation Service (NRCS), the University of California and dairy trade associations participated in providing input to and review of the certification process. The goal of the CDQAP is **compliance through education**. Together we strive to educate producers and provide them with tools (technical information including better management options, regulatory information, opportunities for cost share funding) to manage their facilities compliant with local, state and federal environmental regulations. Our combined efforts as a Partnership have been realized as we are viewed by dairy producers as the 'go-to' place for technical information and the 'one-stop-shopping' location when new or modified regulations arise that require permit applications, reports, record keeping, etc. The services are provided at NO CHARGE to participating producers, at a location near them, thereby reducing economic hardship or hours of travel necessary for operators to obtain information. The CDQAP has sought out funding to conduct various workshops, trainings, develop written and video materials, and distribute needed information to dairy operators at no cash cost to either SWRCB or RWQCBs.

Working together, staff from partner agencies and organizations, including all dairy trade associations, facilitate identification of areas where information is needed (understanding existing, modified or new regulations), assessment of exact materials needed (written information, record keeping templates, spreadsheets, data management tools, ability to translate farm data to management information, etc.), prioritization, development, review and modification of needed materials, and dissemination of material to dairy producers and their consultants. Thousands of collective person hours of time (including those from SWRCB and RWQCBs staff members) have been engaged to develop and disseminate educational information specific within each RWQCBs' jurisdiction.


As spelled out in the partnership agreement, certification requires at a minimum six hours of educational classes related to water quality delivered through the CDQAP, development of environmental stewardship farm management plans (Nutrient and Waste Management Plans), and successful completion of an on-site evaluation by an independent third party. Time and resources needed by producers to prepare for their on-site evaluation is no small task as evident by the number of producers seeking certification during the early years of the program when fees were less and the value of the 50% fee reduction was smaller compared to the added costs of preparation for evaluation. Producers need to demonstrate to the on-site evaluator that their facility is designed and managed to be compliant with local, state, and federal environmental regulations.

Communications with inspectors at RWQCB 1, 2, 5, and 8 indicate that inspections of CDQAP environmentally certified facilities are easier as producers are more organized, better informed about the regulatory expectations, more understanding of inspections, and have necessary record keeping up-to-date. This reduces the time and energy needed to conduct an inspection and complete any follow-up needs. Dairy producers provide a means to improve efficiency of staff inspection time through environmental certification.

The forward momentum of the program has been built on hard work of all partner representative staff members and trust of dairy producers. This momentum and positive attitude is valuable to all of us working on environmental issues. It is likely that changes to the value of the CDQAP fee structure (out-of-pocket costs for fees) will have unknown and negative ramifications to producer and consultant participation in future program outreach. I envision that as more detailed information unfolds from current and future scientific research efforts our future CDQAP outreach efforts will provide more detailed technical information to aid producers in better manure handling and nutrient management practices.

As a Partner in the CDQAP, I am hopeful that SWRCB will continue to incentivize producer participation in this program for all dairies regardless of size. Collectively, we are able to perform our various job responsibilities more efficiently and effectively by having a vibrant outreach program with dairy producers.

Sincerely,



Deanne Meyer, Ph.D.  
Livestock Waste Management Specialist  
Environmental Stewardship Module Coordinator, CDQAP