



Dear Mr. Joe Serna Jr.- CAL/EPA,

Thank you so much for giving us the opportunity to comment on proposal of fees for dairies with waivers in the North Coast and San Francisco Bay Regions.

I would like to ask the board to take into to consideration a new incentive program of reduced fees for the North Coast and San Francisco Bay Regions:

This could set an example for all dairy regions in California.

If any of the examples below are checked off on yearly renewal waterboard forms and a copy of an up to date completed certificate of certification is included with yearly fees, then a reduced fee(s) should be granted to that dairy. This would help to educate all public on dairy farms practices, give dairies support, and have all dairies in our North Coast Region set an example to the public regarding Best Management Practices as they become certified in the below areas.

The yearly reapplication process Waterboard forms should include check boxes of these several certifications that dairy farms can and or have accomplished with incentive reduced fees (even if minimal) next to each box:

- 1.) Comprehensive Nutrient Management Plan (\$ 6,000.00 cost for each dairy certified)
- 2.) California Dairy Quality Assurance Program (\$ 550.00 cost for every 5 year renewal for each dairy)
- 3.) Ranch Plan (\$ variable ongoing cost for each dairy)
- 4.) National Dairy FARM Program Evaluation-On Farm Welfare Records & Training Materials and Herd Health Plan Documents
(Free when dairies' milk company is certified to do evaluations, others have to pay fee)
- 5.) Other dairy related certified programs? (\$costs)

There is no reduced fee in the North Coast for dairies that have completed the CDQAP program and for each renewal year, only a reduced fee outside their region for other dairies. Completing one or all these certifications cost the dairy farm money. Now there is a possibility that North Coast dairies will most likely be charged a fee from the waterboard per animal count yearly.

I think it would be wonderful to have the waterboard offer enticing incentives for North Coast Dairies, even if minimal to become or remain certified in these wonderful programs and set an example for other waterboard regions going forth.

Sincerely,
Nichola Spalletta
Spalletta Dairy-Point Reyes