



**Agricultural Council**  
of California

# Waste Discharge Requirements

January 22, 2013

---

## Committee Work:

- One formal meeting on Nov. 28;
- 87 participants on official committee;
- Additional outreach conducted with minimal feedback;
- Still getting anecdotal information.

## Overarching Themes from Meetings & Correspondence:

- If we simplify the process enough, staff can take a targeted approach by focusing on bad actors, encouraging technology and improving the environment;
- New regulations and revisions must be outcome-oriented vs. process-based;
- Compliance for this permit is immensely complex;
- No call for relaxation of environmental standards.

## Examples of Excessive Costs of Compliance:

- Sampling & Reporting;
- Creation of Plans;
- Creation of Annual Report;
- CDFA's 2010 study of dairies:
  - Approximately \$15K per 1000-cow dairy.

## Outstanding issues of existing regulations:

- Annual Report is not useful in current form;
- Enforcement actions should focus on improving the environment rather than paperwork violations;
- If an entity has a nutrient management plan + a waste management plan, and standards for these reports are met, are there additional requirements necessary for the purpose of law? What are the benefits provided by the other reports?

## Suggestion for changes:

- Create representative sampling programs for industries or watersheds that do not already have them;
  - Be strategic in frequency & locations of sampling;
- Annual Report should be a tool for environmental management;
- Self-monitoring with spot-checks as opposed to required data collection;
- Field trips for staff to gain better understanding of issues, existing and emerging technology;
- Ombudsman or somebody in each agency trained to understand regulations in other agencies;
- Electronic permitting process.

## Next steps:

- Document compliance costs for industries & regions not already documented;
- Suggest strategies for representative sampling & improved sampling strategies in other areas;
- Seek out long-term solutions;
- Reevaluate fee schedule so that it is consistent with workload, once changes are implemented.

## Questions?

**Emily Rooney, Ag Council**  
**(916) 443-4887**

**Bob Gore, The Gualco Group**  
**(916) 441-1392**