



Agricultural Council
of California

Waste Discharge Requirements

June 18, 2013

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;
- Regulations should be outcome-oriented vs. process-based;
- Compliance for this permit is immensely complex across a diverse stakeholder group;
- No call for relaxation of environmental standards – in fact, many commented that this existing compliance structure not only does not improve the environment, but it diverts resources that could be utilized in those efforts.

Top Short Term Recommendations:

- Reevaluate the goals of the permit and its compliance process. Redraft reporting requirements to achieve mutually beneficial goals.
- Eliminate redundancies in monitoring, reporting and studies.
- Grant permits or waivers based on risk level.
- Require management approval of staff data requests in excess of statutory provisions.
- Fees continue to increase, even with a reduced number of businesses operating within the permit and a decrease in water board staff. Reconcile staff levels and budgets so that there is consistent, and decreasing costs to fee-payers.

Top Long Term Recommendations:

- Minimize conflicts between regulatory agencies.
- Create consistent requirements between regional boards.
- Analyze software systems used to report data. There currently is little-to-no assurance of future direction of program or requirements and little technical assistance available.
- Create and establish grant programs to offset capital costs.



Potential Implementation Partners:

- **Governor's Office of Business & Economic Development (GO-Biz)**
- **Ag Innovations Network**
- **Sustainable Conservation**
- **California Council on Environmental and Economic Balance.**



Stakeholder Quote:

“There are huge quantities of obscure regulations... after a while, you give up trying to figure them all out and just assume you’re in violation of something at some point.”

- Northern California Sustainable Grower/Packer