commentletters

From: RKaldor <RKaldor@Dairyinstitute.org>
Sent: Monday, May 04, 2015 10:01 AM
To: commentletters
Subject: SaputoTularePlantWaterReductionImpactOUTLINE.docx
Attachments: SaputoTularePlantWaterReductionImpactOUTLINE.docx

Dairy Institute respectfully submits the attached comments.

COMMENTS FOR SUBMITTAL TO

CALIFORNIA WATER RESOURCES CONTROL BOARD

RE: EMERGENCY WATER CONSERVATION REGULATIONS

MAY 4, 2015

April 28, 2015 amendment changing definition of commercial agriculture from Government Code Section 51201(b) to Section 51201(a), removes food processing plants from the commercial agriculture exemption.

Water Conservation Measures Currently In Place

The earlier regulatory draft would account for the significant water conservation measures taken by dairy and food processing plants.

These plants have already reduced their water consumption by at least twenty percent over the past year

These plants already recycle the water recovered from their processing operations for reuse within their operations. In fact, this water recovery and reuse nearly halves the plants' outside water needs.

Water Reduction Impacts on Plant Environmental and Food Safety Requirements

Reduction of water used by the plants will increase their EC concentrations to levels that exceed EPA allowed discharge levels, and would result in permit violations. There would be no increase in the amount of pollutant being discharged, but the manner in which the limits are calculated makes it difficult if not impossible for plants and their municipalities to comply.

Water supplies must be adequate to meet FDA and USDA food product safety requirements. The vast majority of water used in dairy plants is used in the cleaning process which is vital in ensuring that food products are safe and free from potentially harmful bacteria. Water usage is virtually unaffected by a partial reduction in plants processing volumes.

Plant Supply Chain and Milk Processing Volume

The dairy processing plants located within the city of Tulare receive between ten and fifteen million pounds of milk per day from local dairy farms.

The supply of milk delivered to these plants is not discretionary, it has been planned to meet a group of plants' processing requirements and is supplied under contract; the animals providing the milk cannot stop their own production patterns in any measurable way without months of prior planning. The supply chain to these processing plants is constant, and the milk being received by these plants must have a processing home. Milk is very perishable and must be rapidly consumed or processed into storable product to preserve its value to the farmer and the processor.

Dairy Farmer Impact

Without homes for their milk, dairy farmers will suffer significant loss of revenue needed to support their farm operations and their families

Plant Employment Impact

With reduced output, hundreds of local jobs will be lost on both farms and in and around processing plants. A significant multiplier effect will occur.