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. KINGS COUNTY PLANNING AGENCY 1315 K STREET MODESTO, CALIFORNIA 95354-0917 TELEPHONE (209) 527-6453 FAX (209) 527-0630

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September 10, 2001

Bill Zumwalt, Director Kings County Planning Agency Government Center Building #6 1400 Lacey Boulevard Hanford, California 93230 KINGO SOLVOTY
PLANNING AGENCY

Subject: Revised Draft Dairy Element, Kings County General Plan

Dear Mr. Zumwalt:

Thank you for providing the opportunity to review and comment on the Revised Draft Dairy Element of the Kings County General Plan dated May 7, 2001. Western United Dairymen appreciates your concern for maintaining a healthy and vibrant dairy industry in Kings County. We recognize the tremendous amount of effort that your office expended to prepare the document, and are gratified by your personal willingness to meet with us and discuss the issues and concerns important to us.

There are three points of a general nature that we wish to make on our members' behalf:

- 1. Western United Dairymen is strongly supportive of your efforts to develop a Dairy Element adequate to meet the requirements governing the future of the dairy industry in Kings County. We recognize that you are required to explore all possible environmental implications related to siting new dairies and expansion of existing dairies. We believe you have adequately and thoroughly accomplished that responsibility. We urge that the process you have started now be continued to its logical conclusion.
- 2. While it is required that Kings County identify and respond to environmental implications implicit in the Dairy Element, existing law and programs providing regulation and mitigation are in place both for air and water quality issues through the Regional Water Quality Control Board and the San Joaquin Valley Air Pollution Control District. It is both important and appropriate that Kings County maintain jurisdiction of these agencies for their respective responsibilities, and avoid regulatory redundancy.

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3. No program or regulatory effort will be successful if the requirements are so burdensome that none are able to effectively and economically comply. It is equally important to not anticipate technologies, practices or control methods, to avoid preventing innovation or misdirecting efforts down what may be a politically attractive path, but what is later determined to lack efficacy. Premature endorsement or mandates to utilize a particular technology or methodology might eventually turn out to be wasteful of limited resources and could jeopardize the financial or environmental health of the dairy industry of Kings County.

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Western United Dairymen has made several suggestions and requests for changes in the Revised Draft Dairy Element. We have tried to be constructive in our comment, and hope you will be confident we remain available to work with you and your office to reconcile such differences as may arise from our review.

Very truly yours,

Michael L. H. Marsh, CPA

Chief Executive Officer

MM/kb