



Kings County Farm Bureau

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SEP 10 2001

KINGS COUNTY
PLANNING AGENCY

September 10, 2001

Board of Supervisors
Kings County Government Center
Hanford, CA 93230

Re: Proposed Revised Draft Dairy Element of the Kings County General Plan

Dear Board of Supervisors,

Thank you for the opportunity you have given the Kings County Farm Bureau to review and discuss the Revised Draft Dairy Element of the Kings County General Plan. We have spent many hours analyzing and reviewing the plan.

As you know, agriculture is very important to the economy of Kings County with revenues over 900,000 million dollars. The dairy industry remains at the top of the county's commodities for the fifth consecutive year with a value of over 300,000 million dollars. The dairy industry is directly and indirectly responsible for over 32,000 jobs in the county. Because of this fact, the Kings County Farm Bureau has undertaken this review responsibility very seriously. We have been very methodical in our review.

We appreciate the extension of time to review this document, however the more we review, the more concerned we have become about the workability and practicality to implement the goals and policies put forth in the document. While the document seems to meet or exceed the California Environmental Quality Act requirements, it sets up policies that make it impossible to economically operate a dairy.

There are three major areas of concern:

1. **Monitoring** – The draft Dairy Element, as it stands, is regulatory oppressive with excessive and burdensome monitoring and compliance programs. It creates a paperwork nightmare with little or no environmental benefit. There is no reason to establish a Dairy Monitoring office. The expense of additional personnel and overhead associated with creation a whole new bureaucracy is not needed. Certification should be the Quality Assurance Program should be considered as equivalent to any program established by Kings County.
2. **Air Quality Policy** – This entire policy promotes the development of bad public policy and should be reworked in accordance with the comments. By referencing incomplete research and mandate the implementation of otherwise voluntary programs, Kings County appears to agree with conjecture and opinion as opposed to scientific data. We at the Kings County Farm Bureau seriously question the science used to evaluate the significance the air quality impacts of dairies in the San Joaquin Valley.
3. **Economic Impacts** – While Dairy Element does consider the economic impact and job creation potential of the dairy industry, the numbers used are extremely conservative and grossly under-estimated. Also the social - economic impacts of implementation of the policies are not considered. In conferring with various professionals in the area it is estimated that for the initial establishment of programs

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(based on a 3,000-milk cow dairy) is approximately \$290,000 or \$96 per milking cow. The initial costs would be more per cow for smaller dairies trying to expand, as they would have fewer milk cows over which to spread the costs. Maintenance costs per year are approximately \$230,000 per year or \$76 per milking cow. These costs will increase over time. Since the monitoring requirements are applicable to all facilities, large or small, the figure may be multiplied by all cows to arrive at an annual cost. So, if there are 125,000 milk cows presently in Kings County then the cost to establish the program would be \$12,000,000 and \$9,500,000 to maintain the program. We have yet to quantify the environmental benefits, *if any*, derived from then initial and maintenance of the proposed programs.

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At this time, as presented, because of all of the concerns set forth in the attachments, we at the Kings County Farm Bureau cannot support the adoption of the dairy element as proposed and would recommend a no vote when it is presented for adoption.

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We at the Kings County Farm Bureau would like to offer our assistance in developing a document that meets the requirements of California Environmental Quality Act and a document the dairy industry cannot only live with but flourish under.

If the County of Kings and the Kings County Farm Bureau work together cooperatively toward the neutral and equally beneficial goals of clean water and air, we are confident a document based on peer reviewed science, recognizing and supporting the California Dairy Quality Assurance Program and associated third-party environmental evaluation, and United States Department of Agriculture's Agricultural Air Quality Task Force's voluntary compliance program, could be developed and implemented to achieve verifiable environmental protection and enhancement while exceeding the requirements of California Environmental Quality Act.

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Again, thank you for the opportunity to comment on this very important document to the economic viability of Kings County. Please feel free to contact us with any questions or concerns.

Sincerely,



Chuck Draxler
Dairy Element Chairman

Comments attached

CD:rs/ss