

KERN COUNTY CATTLEMEN'S ASSOCIATION
9501 West Lokern Road
McKittrick, CA 93251



Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814

September 1, 2015

Re: State Water Resources Control Board Draft "Resolution No. 2015-Discontinuation of Discussions Regarding a Statewide Approach to Addressing Water Quality Impacts from Livestock Grazing"

Dear Ms. Townsend:

The Kern County Cattlemen's Association has a membership of over 120 individuals and/or business entities, the majority of whom earn a living from their production of cattle that require grazing land and water. These comments are to express the strong opposition of our Association to any attempt by the State Water Resources Control Board and/or its regional boards to regulate livestock grazing.

This draft Resolution is simply a re-packaging and regionalization of the Water Board's former GRAP proposal and ignores the significant opposition that was expressed by livestock and property owners, trade organizations and elected officials throughout the state, including the Kern County Board of Supervisors, Kern County Planning Department, State Senator Andy Vidak, Assemblywoman Shannon Grove and the Kern County Farm Bureau. Just as GRAP did, the draft Resolution establishes and grants the State and Regional Water Boards bureaucratic authority to dictate grazing use. Our organization challenges the Water Board's authority to impose mandates on our property use. We challenge the Water Board's authority to impose fines or penalties based on an unelected official's determination that a violation has occurred. Our organization recognizes the authority of the U.S. constitutional guarantees of land and water rights. We support the concept of local control, which begins with the owner of the private land and water rights.

Our organization challenges the Water Board's authority to establish "Best Management Practices" for our industry. The Water Board's motives and justification for this project are suspect since it has failed to scientifically and effectively prove a direct link between livestock grazing and water impairment. California ranchers succeed and maintain their businesses because they are excellent managers of their land and animals. Ranchers find themselves the primary custodians of the State's wildlife because their good animal husbandry practices extend to the wildlife's benefit as well. Land and resource-based businesses are the source of new wealth – and the only long-term driver of California's, or any, economy. This draft Resolution threatens to establish a level of governmental control, regulation and interference that would harm livestock businesses and cannot be legally justified. The absence of legal authority and the lack of an expressly identified problem reveal this to be a Water Board land and water grab. We ask that draft "Resolution No. 2015 be withdrawn from any further consideration. Californian's tax dollars should be focused elsewhere.

Sincerely,
Austin Snedden, President
Kern County Cattlemen's Association

cc: Kern County Board of Supervisors
Senator Andy Vidak
Senator Jean Fuller
Assemblymember Shannon Grove
Kern County Planning Department
Kern County Farm Bureau
Governor Jerry Brown