



CENTER for BIOLOGICAL DIVERSITY

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*protecting and restoring natural ecosystems and imperiled species through
science, education, policy, and environmental law*

9/2/2015

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814
commentletters@waterboards.ca.gov



RE: Comment Letter – Grazing Regulatory Action Project

Dear State Water Resources Control Board,

The Center for Biological Diversity submits these comments on the Grazing Regulatory Action Project Draft Resolution noticed for the September 16, 2015 Board Agenda, Discontinuation of discussions regarding a statewide approach to addressing water quality impacts from livestock grazing. The Center has been an active participant with the Board regarding grazing impacts to water quality for several years including stakeholder meetings. Most recently, we participated in the Grazing Regulatory Action Project meeting on November 3, 2014. The Center is concerned that the new proposal to abandon this statewide to regional efforts only will slow the process significantly and ultimately fail to provide the needed improvements in grazing management to protect water quality throughout the state.

While we agree that regional differences in rangeland type, grazing practices and water quality factors need to be addressed at a local and regional level as well, overarching goals and standards are also critically important to protect beneficial uses of surface and groundwater, and address water quality impacts related to livestock grazing across California. Overarching statewide goals and standards are needed to provide consistency in development and implementation of regional grazing approaches.

Therefore we recommend that the draft SWRCB Resolution No. 2015- Discontinuation of discussions regarding a statewide approach to addressing water quality impacts from livestock grazing, be modified to continue the statewide process. Suggested draft language could include the following: :

THEREFORE BE IT RESOLVED THAT:

The State Water Board therefore directs the following:

1. Discussions regarding a statewide approach to addressing the water quality impacts from livestock grazing be continued.

2. Overarching goals and standards be developed that apply to all regions so that they may be consistently applied throughout the State. This process should be completed by January 1, 2017.

3. The Regional Water Boards should work collaboratively with individual property owners, livestock grazing operators, and other interested stakeholders to determine which actions, including regulatory actions and effective non-regulatory efforts for BMP implementation, are best suited to achieve the statewide goals and standards to protect water quality and the beneficial uses of waters from pollution.

4.. The Regional Water Boards should consider prioritizing actions to address livestock grazing operations that cause impairment, or have the likelihood to do so based on unique hydrology, topography, climate, and land use of that specific region.

5. The Regional Water Boards should establish monitoring requirements, including watershed-wide or regional monitoring programs, to assess the effectiveness of all BMPs implemented under regulatory or non-regulatory actions.

6. The Regional Water Boards should take actions they determine to be necessary to protect water quality and the beneficial uses of waters from pollution consistent with state and federal laws and the statewide goals and standards. Actions may be regulatory or based on non-regulatory efforts for BMP implementation, or a combination of the two.

We believe the proposed revised language for the resolution would more fully comply with the State and Regional Water Boards' obligations under the State's Porter-Cologne and federal Clean Water Act to maintain high standards of water quality across the state.

Sincerely,



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