



(9/16/15) Board Meeting
Grazing Regulatory Action Project
Deadline: 9/3/15 by 12:00 noon

Sent Via Email
commentletters@waterboards.ca.gov

September 3, 2015



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

Re: Proposed Draft Resolution for the Discontinuation of Discussions Regarding a Statewide Approach to Addressing Water Quality Impacts from Livestock Grazing

Dear Chair Marcus:

The California Farm Bureau Federation (Farm Bureau) is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 57,000 agricultural, associate and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

California Wool Growers Association (CWGA) represents nearly 500 California sheep member producers consisting of large scale commercial sheep operations, farm flock producers, lamb feeders, and affiliated industry stakeholders. Since 1860, CWGA has been the voice of the California sheep industry and represents the second largest sheep state in the United States.

Farm Bureau and CWGA appreciate the opportunity to comment on the Proposed Draft Resolution for the Discontinuation of Discussions Regarding a Statewide Approach to Addressing Water Quality Impacts from Livestock Grazing (Proposed Resolution). Farm Bureau thanks the State Water Resources Control Board ("SWRCB") for its thoughtful and thorough consideration of this issue and encourages the SWRCB to adopt the Proposed Resolution.

As originally proposed, the Grazing Regulatory Action Program (GRAP) caused extraordinary concern for Farm Bureau members who graze livestock. Over the following months Farm Bureau worked with its members, California Cattlemen's Association, and CWGA to coordinate their efforts to work with the SWRCB to better understand the issue and ranchers' concerns. In addition to clarifying why a statewide regulatory program was not appropriate, these efforts identified a number of important issues the SWRCB and regional boards should consider:

- **Water Quality Improvement Efforts** – For several decades ranchers have worked to address water quality issues through management and infrastructure improvements. These efforts, largely guided by the voluntary Water Quality Short Course, have been successful.
- **303(d) List** – Although the information and knowledge related to grazing and water quality has advanced, and even though great strides have been made to improve water quality, the 303(d) list, as it relates to grazing, does not reflect this state of information. Also, the data used to support existing listings needs to be made available to better understand the rationale for listing and to allow for thoughtful consideration as to whether listing is still warranted.
- **Targeted Action** – Any regional activities related to grazing and water quality should be targeted to where there are actual problems. In many instances, generalized data and assumptions are used to argue for general regulation of grazing. This is overly burdensome and will not improve water quality. Regional boards should focus on resolving specifically identified issues and avoid region-wide regulations.
- **Monitoring** – Before conducting any additional monitoring, regional boards should consider the monitoring already being conducted pursuant to the Irrigated Lands Regulatory Programs and other sources.
- **Reasonable Water Quality Standards** – Regional boards should reconsider the water quality standards related to grazing, particularly with regard to the use of *E. coli* as the sole indicator organism.
- **Support Voluntary Actions** – The SWRCB and regional boards should support ranchers’ voluntary actions to address water quality. This should include participating in any efforts to consider the Water Quality Short Course, NRCS and other grants, other best management practices programs, and basic educational information about rangeland water quality.

We appreciate the SWRCB’s consideration of this resolution and especially appreciate the recognition that efforts to protect water quality can be non-regulatory. In conclusion, Farm Bureau and CWGA thank the SWRCB for thoughtfully working through this issue with stakeholders. We look forward to continuing to work with the SWRCB and regional boards regarding water quality benefits related to grazing.

Sincerely,



California Farm Bureau Federation



California Wool Growers Association

JLR/dkc