

## Upper Salinas-Las Tablas Resource Conservation District

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September 1, 2015

Jeanine Townsend, Clerk to the Board

State Water Resources Control Board

1001 I Street 24<sup>th</sup> Floor, Sacramento, California 95814

Re: Statewide Grazing Regulatory Action Project (GRAP)

Dear GRAP Committee Members::

This letter is written on behalf of the Upper-Salinas-Las Tablas Resource Conservation District and its members. Thank you for this opportunity to comment on the discontinued Statewide Grazing Regulatory Action Project (GRAP).

We are in favor of discontinuing the discussion of the Statewide Regulatory Action Project regarding livestock grazing and commend the board for this action.

If regional boards are best suited to protect water quality and beneficial uses of waters from pollution, the following must be addressed:

1. The regional board (R3), needs to improve their assessments of **all** sources that effect water quality within the watershed; including but not limited to livestock, **wildlife**, natural erosion, people, pets, etc.
2. Regional boards should consider the impact to water quality based on unique hydrology, topography, climate, soils, and land use of that specific site.
3. The regional board needs to consider cost of compliance through use of Best Management Practices. Monitoring is very expensive, onerous, and may not even give proper results unless done in a very scientific process.
4. The regional boards need to be careful about requirements of monitoring. Monitoring 40 million acres is infeasible
5. The regional boards need to address the efficiency of using fecal coliform/generic E.coli as indicators of pathogens. We suggest changing the standard to reflect new scientific studies showing that risks of pathogens are not high, even if current standards are exceeded.
6. There are many other agencies, individuals, and scientists, that are working to protect our environment, including water quality, along with the financial integrity of the agricultural industry that

need to be included in this endeavor.

7. Livestock grazing in California is an essential element of the state's economy by filtering and infiltrating surface water, providing open landscapes, protecting habitat for native plants and wildlife, and reducing fire hazards. Also, what about potential carbon sequestration processes, the list goes on and on.

In closing, more controls will jeopardize the fragile grazing industry that preserves our open space. **"Ranchers are good stewards of the land"**. Their livelihood is in constant threat as a result of regulations. Please **EDUCATE, DON'T REGULATE**.

A typical ranch has a very low cash flow and is a lot of hard work. Please don't put more fees in place and force more rangeland to be sold.....more vineyards, orchards, asphalt, and concrete, where are our **fish and wildlife** to go!

Respectfully Submitted,

Susan A Cochrane, Vice President

Upper Salinas Las-Tablas Resource Conservation District