

# CALIFORNIA CATTLEMEN'S ASSOCIATION

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SERVING THE CATTLE  
INDUSTRY SINCE 1917



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6/18/2008

Ms. Carmen Fewless  
San Francisco Regional Water Quality Control Board  
1515 Clay Street, Suite 1400  
Oakland, CA 94612

*Transmitted via email: [cfewless@waterboards.ca.gov](mailto:cfewless@waterboards.ca.gov)*

Dear Ms. Fewless:

The California Cattlemen's Association (CCA) appreciates the opportunity to comment on the draft *Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed in the San Francisco Bay Region (waiver)*. CCA is a statewide trade organization representing ranchers and cattle producers who strive to appropriately manage livestock grazing while reducing impacts to water quality.

In general, CCA supports voluntary mechanisms to achieve water quality goals within the watershed, however, if a regulatory method is drafted, it should allow producers to manage areas of concern and determine the best way to address potential sediment and pathogen discharge areas. CCA appreciates the San Francisco Bay Regional Water Quality Control Board (Regional Board) drafting a waiver that provides ranchers the flexibility to determine what areas have the potential to be a discharge site, what management practices will effectively alleviate excess discharge and at what point should the management practices be implemented to most effectively minimize sediment and pathogen discharge. This approach will certainly encourage more ranchers to participate in the program and will achieve more effective water quality results.

In addition, CCA recommends the Regional Board support ranchers working in conjunction with the Natural Resources Conservation Service (NRCS), the University of California Cooperative Extension (UCCE) system and local Resource Conservation Districts to develop and implement Ranch Water Quality Plans. Both organizations have a unique knowledge of addressing water quality concerns using best management practices based on sound science and research and have the experience working with ranchers and land managers in implementing management practices on the ground.

CCA is also in support of ongoing and emerging research being developed at the Sierra Foothills Research and Extension Center evaluating the impacts of new management practices to help control pathogen runoff from non-irrigated rangeland. CCA hopes that as additional research and information becomes available, the Regional Board will consider this information valuable and generally support best management practices that are based on sound science and research.



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PRESIDENT  
WELDON

**MYRON OPENSHAW**  
TREASURER  
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If and when, the Regional Board and those impacted determine a third party verification system is needed, CCA recommends producers are given the option to form watershed coalitions to share costs and monitoring activities. The coalition would also serve as an intermediary between ranchers and Regional Board staff to streamline information gathering and outreach. Coalitions have played a vital role in helping farmers and ranchers comply with waivers in other regions, work towards meeting water quality objectives and assist the regulated community in administering waiver provisions in a cost effective manner.

Once again, CCA appreciates the opportunity to comment on the draft waiver and encourages the Regional Board to continue to collaboratively work with ranchers and research partners to address water quality concerns and known impairments while minimizing unnecessary regulatory burdens on ranchers within the region. Should you have any questions regarding my comments, please don't hesitate to contact me.

Sincerely,

Justin Oldfield

Director of Industry Affairs



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