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June 18, 2008

John Muller, Chairman
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Regarding: Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed

Western United Dairy Men is a dairy trade association representing 1,100 dairy families and approximately 60% of the milk produced in California. Most of the dairies within the Tomales Bay Watershed are members of our association. Thank you for the opportunity to comment on the Conditional Waiver of Waste Discharge Requirements for the Grazing Operations in the Tomales Bay Watershed.

Western United Dairy Men has reviewed the proposed waiver with regional board staff. We note that regional board staff members have made a significant effort to acquire a sound understanding of the technical issues associated with grazing in the Tomales Bay watershed. We appreciate their work and commend them for their efforts. We believe that the waiver provides fair and reasonable expectations of our membership, and will provide a sound and effective instrument to protect the quality of Tomales Bay waters.

We must point out that it may not be possible to develop the necessary curriculum and conduct the outreach necessary to help landowners and operators complete the Ranch Plans by the proposed timeline of December 31, 2009. A large number of Tomales Bay watershed landowners are absentee owners. We expect substantial difficulty in contacting landowners, informing them of the Ranch Plan training opportunities that will be available, and actually getting agreement between the owner and the operator as to who is responsible for the planning activity. We suggest that the second annual certification date of November 15, 2010 is a more realistic date.

Western United Dairy Men supports adoption of the Conditional Waiver of Waste Discharge Requirements for Grazing Operations in the Tomales Bay Watershed with the change that we have requested.

Very truly yours,

Paul E. Martin
Director of Environmental Services

cc: Michael Marsh