



CALIFORNIA FARM BUREAU FEDERATION

NATIONAL AFFAIRS & RESEARCH DIVISION

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April 15, 2010

Gaylon Lee
Division of Water Quality
State Water Resources Control Board

Barry Hill
Regional Hydrologist
U.S. Forest Service, Region 5

Dear Mr. Lee and Mr. Hill:

The California Farm Bureau Federation (“Farm Bureau”) appreciates the opportunity to provide comments on the revised Best Management Practices (BMPs) for Rangeland Management Activities and Control of Road Drainage under the U.S. Forest Service’s Water Quality Management Plan (WQMP).

Farm Bureau represents more than 34,000 farmer and rancher members, many who depend on the responsible management of U.S. Forest Service (USFS) National Forest lands. 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.

First and foremost, we recognize that the WQMP and associated BMPs have proved very effective at protecting water quality on California’s USFS lands. The “Water Quality Protection on National Forests in the Pacific Southwest Region: Best Management Practices Evaluation Program, 2003-2007” clearly indicates that implemented BMPs were rated as **93% effective**. Therefore, any proposed revisions should simply provide clarification. The WQMP and BMPs should continue to be based on the best available science.

Overall, we are comfortable with the proposed revisions to the Rangeland Management BMPs. However, we want to reiterate that the BMPs should only address those aspects of rangeland management that affect water quality. For example, factors such as livestock intensity, frequency, duration, season of use, etc. don’t inevitably impact water quality. These factors only impact water quality if they are occurring near a water body or in an associated area (lower watershed) where science has proven an impact to water quality. More specifically, upland conditions are not inevitably an indicator of water quality.

Finally, should any additional revisions be made to the BMPs, we would ask you to circulate the document again for review. Feel free to contact me with any questions at 916-561-5618.

Sincerely,

Elisa Noble

Elisa Noble
Director
Livestock, Public Lands, and Natural Resources