

Jane Wooster  
PO Box 340  
San Lucas CA 93954

[janne@woosterranch.com](mailto:janne@woosterranch.com)

Ph: 831-809-4568

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BY EMAIL: [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov)

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



This letter is to submit my comments on the proposed draft resolution for the discontinuation of discussions regarding a statewide approach to addressing water quality impacts from livestock grazing.

It appears that this proposed resolution only terminates the statewide approach to addressing water quality for livestock grazing and kicks the issue back to the Regional Water Boards.

- 1.) This resolution makes no effort to compile and disseminate the information that was accumulated during the listening sessions. It is asserted in the Notice of Opportunity for Public Comment that “Principal among the feedback was that regional differences in rangeland type, grazing practices and water quality factors supported a regional approach to grazing rather than a statewide approach.” Surely, those of us who participated in the GRAP listening sessions should at the very least be provided with a summary of those differences.
- 2.) This resolution makes no commitment to requiring that Regional Water Boards develop sound science for their TMDL listings or establish protocols for water sampling, which **they should do** and;
- 3.) This resolution actually recommends that Regional Water Boards “should consider prioritizing actions to address grazing operations that cause impairment, or have the likelihood to do so,” **thus recommending a form of action without even requiring the Regional Water Boards to adequately establish that action is needed.**

Case in Point:

Please look at these two photos of the San Lorenzo Creek in the Peach Tree Valley approximately thirty miles upstream from King City, CA. These photos were taken on December 23, 2013. The San Lorenzo Creek was completely dry in this area as it generally is. On average, over a forty year period, I have seen this creek run about a total of zero to eight days per year.



Headwaters of San Lorenzo Creek  
Showing Streambed in December 2013



San Lorenzo Creek  
Showing Streambed Going Down the Peach Tree Valley  
December 2013

In 2011 we received a Notice of Certification of Total Maximum Daily Loads for Fecal Indicator Bacteria for the San Lorenzo Creek. After inquiries of Water Board personnel, we were told that the water samples that were the basis for this notification were taken by in-house personnel (Mary Adams) from a public access point on Bitterwater Road, King City, CA. The samples indicated impairment due to fecal waste. This testing site is approximately thirty miles downstream from our property in one of the few areas of the creek that are wet on a year-round basis, in a place where wild hogs are known to wallow, and which is just downstream from an operating gravel pit. The employee of the Regional Water Board to whom we spoke failed to see why we were concerned when we questioned the sampling method and the listing, and yet the State Water Board is already encouraging changes in ranch grazing practices for ranchers on this drainage without having scientifically established that there is any problem that traces back to livestock grazing.

Clearly, if you need a resolution, it should address establishing a program to educate Regional Water Board personnel with what is trying to be accomplished by water sampling and with what generally accepted industry standards for water sampling involve. Basing your program on sound science and not assumption would be a sound beginning.

Only after a good sample is obtained, will you be able to DNA test the sample to determine if livestock, wildlife, birds or people are even a source of the problem.

Making assumptions is always a risky practice which can prove embarrassing at best. I might even suggest, that kicking this issue back to the Regional Water Boards without adequate supervision and training might also prove to be a very embarrassing decision. And clearly, looking at these visuals should indicate to you that listing an entire watershed, instead of identifying areas of concern, is an unfair, shotgun type of approach and we should expect a more scientific approach from the State Board of Water Resources.

Respectfully Submitted,



Jane Wooster