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## **Comment Letter—Grazing Regulatory Action Project (GRAP)**

Comments on North Coast Regional Quality Control Board  
Regulations on Cattle Grazing Due September 3, 2015

### **STATEWIDE BENEFITS PROVIDED BY MODERATE GRAZING:**

#### **Cattle grazing provides seed beds for stream bank vegetation.**

The Department of Fish and Wildlife representative Bob Smith's presented a slide presentation of the Little Shasta River at its crossing with Hovey Gulch Road looking up stream from the concrete bridge:

Photo #1 (Serka 1860-1890) showed the Little Shasta River with a rocky bed and no vegetation on or above the banks. Photo #2 (Serka 2010) showed a lush streambed and bank vegetation with willows, cottonwood trees and perennial grasses on and above the banks. The supported explanation for this was because of the Euro-American habitation of these lands adjacent to perennial streams, the flood irrigation they provided which created stream bank accretion, in conjunction with the cattle grazing adjacent to waterways created the seed bed and moisture needed for vegetation. The cattle footprints created seed beds for that lush vegetation that we now see.

**Cattle grazing provides seed beds necessary for the reseeding of annual grasslands** (cattle footprints create annual seed beds)

**Cattle grazing reduces catastrophic uncontrollable fires.** These past few years have been sever fire years with catastrophic uncontrollable fires. Thank goodness for cattle gracing in the low lands, foothills, and mountain ranges. Yes, even adjacent to perennial streams. By not allowing cattle to graze in these areas the grasses will grow tall, head out and create a more severe fire danger. When cattle graze, the grasses stay low and green with new growth.

**Cattle grazing reduces water consumption (ET) of stream bank vegetation and promotes more in- stream flow.** Studies have been made by the State Dept. of Forestry to monitor the water consumption (evapotranspiration **ET**) of a large cottonwood or willow tree to be about 1 gallon per minute or 1,440 gallon per day. Assuming that a perennial stream has an equivalent of a large willow on the banks at a spacing of 25', the consumption rate would be 1 cubic foot per second (cfs) per mile of stream.

By allowing cattle to graze adjacent to streams, some of this uncontrolled water consumption by willows and perennials would be reduced and controlled.

Lets assume, for example, (using a total of 11,128 miles of state wide impaired waters) that the average stream flow loss by **ET** is not the 1 cfs used in the example above, but 50% or 0.5 cfs per mile. Now let's assume that cattle grazing adjacent to streams reduces that consumption by 25%. The resulting amount would be the following:  $(0.5)(0.25)(11,128)=1,400$  cfs or 2,800 acre feet per day. Assuming that the **ET** of the vegetation adjacent to these streams would be consumptive for the months of May through September. This **ET** consumption

would amount to  $(2,800)(30)(.5) = 420,000$  ACRE FEET  
TAKEN FROM INSTREAM FLOW ANNUALLY.

**Studies have been made to show that a stream adjacent to moderate cattle grazing benefit aquatic habitat.** Aquatic life in a stream adjacent to cattle grazing operations was shown to have health benefits from nutrients as opposed to one devoid of nutrients. In the studies where there is no grazing the native fish did not prosper.

**Nonpoint source pollution Control (NSP) requirements for grazing regulation for the North Coast Region are not justified.** The North Coast Region is sparsely populated with the majority of California's Waters, of which most of these waters are devoted to in-stream flows. Point pollution studies have not been made to justify regulations on grazing adjacent to streams. Water quality studies must be made upstream and downstream of an operation to determine that the cattle are the determining factor that creates impaired water for in- stream flow requirements that is being flushed out to the ocean.

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