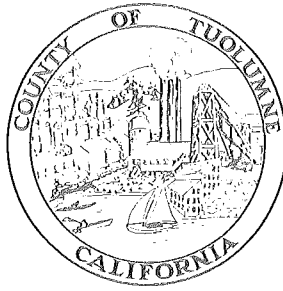


Tuolumne County  
Administration Center  
2 South Green Street  
Sonora, California 95370



Alicia L. Jamar, *Chief Deputy*  
Clerk of the Board of Supervisors

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**(9/16/15) Board Meeting**  
**Grazing Regulatory Action Project**  
**Deadline: 9/3/15 by 12:00 noon**

## **BOARD OF SUPERVISORS COUNTY OF TUOLUMNE**

Sherri Brennan, *First District*  
John L. Gray, *Fourth District*

Randy Hanvelt, *Second District*

Evan Royce, *Third District*  
Karl Rodefer, *Fifth District*

*September 1, 2015*



### **Via Email**

[alicia.barrios@waterboards.ca.gov](mailto:alicia.barrios@waterboards.ca.gov)

The Honorable Felicia Marcus  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

Re: Grazing Regulatory Action Project (GRAP)

Dear Chairwoman Marcus:

On behalf of the Tuolumne County Board of Supervisors (TCBS), we are writing in response to your Notice of Opportunity for Public Comment and Consideration of Adoption for a Proposed Draft Resolution for the Discontinuation of Discussions Regarding a Statewide Approach to Addressing Water Quality Impacts from Livestock Grazing.

200,000 acres of rangeland exist in Tuolumne County. This rangeland and the livestock grazing operations associated with it provide great economic, \$10,440,000 (2013 gross value figures), consumer, and environmental benefits to Tuolumne County. In light of these facts, we greatly appreciate the opportunity to comment on the State Water Resources Control Board's (SWRCB) Proposed Draft Resolution.

As you are well aware, during the SWRCB 2014 and 2015 GRAP listening sessions there was an overwhelming response from ranchers and the scientific community that water impairments caused by livestock grazing were grossly overstated and that a functioning 1995 Rangeland Watershed Program (RWP), adopted by SWRCB, along with many other stakeholders, already existed allowing for a voluntary adoption of best management practices adapted to mitigate site-specific conditions related to rangeland grazing and its potential to degrade water quality. The RWP recognized that a one-size-fits-all regulatory approach would be difficult to implement due to the diversity of California's rangelands and ranching operations.

In response to the GRAP discussions, the University of California's Agriculture and Natural Resources Watershed Laboratory (UCANRWL) published a March 2015 Policy Brief addressing Rangeland Water Quality Planning, Education and Science in California (see attached). This policy brief, authored by University of California Davis professor Dr. Ken Tate (among others) outlines the history and success of the RWP, a stakeholder partnership, and its educational approach to creating ranch-specific water quality plans.

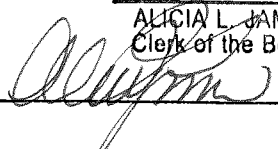
As you know, the RWP educational approach consists of a Ranch Water Quality Management Planning Short Course that is built upon a foundation of science and on-the-ground experience. Identified best management practices (BMPs) are the result of research that has documented the efficacy of practices that protect and enhance water quality including basic and applied research that addresses actual grazing related impairments. The policy brief recommends: "When considering new grazing regulatory actions, policymakers should build upon the existing collaborative approach of the RWP".

The SWRCB's draft resolution contains six specific directions.

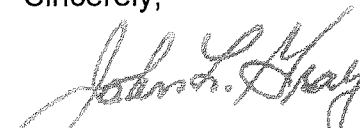
- \* We fully support direction one since a statewide one-size-fits-all regulatory approach fails to address the diversity of California's rangelands and ranching operations.
- \* We fully support direction four since the cost of compliance is an important consideration when that cost may make or break the financial success of a ranching operation.
- \* Based on UCANRWL's March 2015 Policy Brief, directions two, three, and six should be eliminated and replaced with a direction to the Regional Water Quality Boards to build upon the existing SWRCB's agreed upon collaborative RWP approach that relies on the adoption of proven science-based BMPs.
- \* Direction five recommending monitoring should be eliminated since the RWP's BMPs represent research-demonstrated efficacy and result in an unnecessary expense to ranch operations.

Thank you for your thoughtful consideration of Tuolumne County's comments.

I hereby certify that according to the provisions of Government Code Section 25103, delivery of this document has been made.

By:   
ALICIA L. JAMAR  
Clerk of the Board

Sincerely,

  
John L. Gray, Chairman