

**SAN LUIS OBISPO COUNTY CATTLEMEN'S ASSOCIATION
P. O. BOX 302
PASO ROBLES, CALIFORNIA 93447**

September 2nd, 2015

Jeanine Townsend, Clerk to the Board
Felicia Marcus, Chairman of Board &
Board Members
State Water Resources Control Board
1001 I Street, 24th Floor
Sacramento, CA 95814



Subject: "Comment Letter-Grazing Regulatory Action"

Dear Ms. Townsend, Chair Marcus and Members of the Board:

San Luis Obispo County Cattlemen's Association is in full support of the SWRCB's decision to **terminate** GRAP. Thank you and your Board for taking your time and listening to the concerns of Cattle Ranchers and their families throughout California.

While we are in complete agreement to terminate GRAP, our Association will have many of the same concerns at the Regional levels that we have expressed to the State Board re: GRAP. Our local Association will not merely acquiesce to region wide regulation of grazing. We are deeply concerned that SWRCB is considering a regulatory program without first demonstrating that grazing is a significant contributor to water quality impairments throughout the regions and then giving ranchers a fair opportunity to correct any such problems. Another very important concern which we have expressed since November, including the flaws that exist with California's 303(d) list--that is, the list of impaired waterways and their sources. While we are happy GRAP is going away, the SWRCB still needs to ensure that they review the 303(d) list and otherwise respect the state of present science regarding grazing and water quality. Additionally, SWRCB and Regional Water Boards need to *fully* recognize the benefits grazing imparts upon California's land, water, and wildlife resources, and ought to fully account for *alternative* sources of water quality impairments, such as all the illegal marijuana crops being grown throughout California with lots of contaminated water runoff which *should* be a major concern and addressed by SWRCB.

Water quality is not an area in which ranchers simply wish to be 'left alone.' On the contrary, protecting and enhancing water quality has been an area of significant focus for both the ranching industry and local beef cattle producers. However, to best protect the economic viability of ranching and the environmental and ecological benefits associated with managed grazing, it is imperative that local, site-specific preventative solutions be prioritized over new and potentially-costly regulatory programs. Local ranchers have widely participated in voluntary programs such as conservation planning and implementation, as well as attending Rangeland Water Quality Short Courses. Our Regional Water Quality Control Board also provides water quality education, technical assistance and incentives emphasizing the benefits of managing towards healthy watersheds. We would hope the Regional Board would look at scientific and factual information as well as educational (short courses, etc.) as very important and stay away from regulatory approaches, especially cumbersome or strict regulatory actions.

Abundance of thanks for opening your doors and your efforts to visit some of our ranchers and your understanding that we are good hard working people, trying to take excellent care of the environment, so the next generations of our families can continue raising livestock, and providing food for everyone's tables. We look forward to the continuation of a favorable working relationship with both the SWRCB and the Regional Office as well. We are always willing to take time to meet with you and we look forward to being included in any future decision-making which may effect our livelihoods.

Sincerely,



Steve Arnold, President
San Luis Obispo Co. Cattlemen's Assn.

CC: Matthias St. John, Executive Officer, North Coast RWQCB
Bruce Wolfe, Executive Officer, San Francisco Bay RWQCB
Kenneth Harris, Executive Officer, Central Coast RWQCB
Samuel Unger, Executive Officer, Los Angeles RWQCB
Pamela Creedon, Executive Officer, Central Valley, RWQCB
Patty Kouyoumdjian, Executive Officer Lahontan RWQCB
Robert Perdue, Executive Officer, Colorado River Basin RWQCB
Kurt Berchtold, Acting Executive Officer, Santa Ana RWQCB
David Gibson, Executive Officer, San Diego RWQCB