

CALIFORNIA CATTLEMEN'S ASSOCIATION

1221 H STREET • SACRAMENTO, CALIFORNIA • 95814-1910

SERVING THE CATTLE
INDUSTRY SINCE 1917



PHONE: (916) 444-0845
FAX: (916) 444-2194
www.calcattlemen.org

July 1, 2011

Mr. Charlie Hoppin
Chair
State Water Resources Control Board
1001 I Street
Sacramento, CA 95814



Dear Chair Hoppin,

The California Cattlemen's Association (CCA) appreciates the opportunity to comment on new Water Diversion Measurement standards that may be proposed by the State Water Resources Control Board (SWRCB) in the future. CCA is a statewide trade organization representing ranchers and beef producers, many of whom depend on historic water rights to maintain ongoing livestock production.

While changes made to the California Water Code allow the SWRCB to require Best Available Technologies, Best Professional Practices and monthly reporting for water diversions, the law also stipulates that the SWRCB is not required to adopt these practices if deemed cost prohibitive. CCA opposed these amendments in the legislature, and thus we are generally opposed to requiring the use of expensive monitoring techniques by farmers and ranchers.

Even though the legislature required those who have pre-1914 or riparian water rights to report water use triennially, these rights remain excluded from the authority of the SWRCB as long as the water is used to maintain a beneficial use, including agricultural production. Thus, CCA believes the current process to submit annual flow data triennially to the SWRCB for pre-1914 and riparian rights is sufficient.

In addition, the use of Best Available Technologies or Best Professional Practices are generally cost prohibitive to implement by ranchers. Ranchers and beef producers have not recovered from the economic downturn, years of constant drought and margins still remain very tight as the price of input costs have skyrocketed with rising food prices.

Consistent with the law, CCA urges the SWRCB over the coming months to explore the development of an official process to all water users to petition staff to receive an exemption



KEVIN KESTER
PRESIDENT
PARKFIELD

TIM KOOPMANN
FIRST VICE PRESIDENT
SUNOL

JACK HANSON
TREASURER
SUSANVILLE

PAUL CAMERON
FEEDER COUNCIL CHAIR
BRAWLEY

NATIONAL CATTLEMEN'S BEEF
ASSOCIATION

BILLY GATLIN
EXECUTIVE VICE PRESIDENT
SACRAMENTO

DARRELL WOOD
SECOND VICE PRESIDENT
VINA

BILLY FLOURNOY
SECOND VICE PRESIDENT
LIKELY

JIM DAVIS
SECOND VICE PRESIDENT
SANTA YSABEL

BILL BRANDENBERG
FEEDER COUNCIL VICE CHAIR
EL CENTRO

from the implementation of Best Available Technologies or Best Professional Practices. We hope that the SWRCB will also continue a thorough dialogue with impacted stakeholders, like CCA and California's beef producers, to ensure that any proposed regulations are thoroughly reviewed and commented on by the agricultural community.

Please do not hesitate to contact me if you have any additional questions in the meantime.

Sincerely,

A handwritten signature in black ink that reads "Justin Oldfield". The signature is written in a cursive, flowing style.

Justin Oldfield
Director of Government Affairs