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**Subject:** 303(d) List Revisions  
**Date:** Tuesday, October 18, 2016 10:19:44 AM

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Dear Mr. Simi: Thank you for the opportunity to comment on the proposed Revisions,

The data used to propose these 6 listings was submitted by a single source that has recently shifted to advocate a strong position against all livestock grazing in upper elevations of the USFS.

Basing your revisions on data received prior to 2010 from a single source with a strong position against grazing is disingenuous at best, and serves no purpose other than to further the argument of those who want to ban the long standing practice of grazing in the National forest which benefits the forests meadows and serves as a means of fuel reduction for forest fire suppression in its own right. Why not use better data to make better decisions?

In 2013, researchers from the University of California Davis published a peer-reviewed study titled "Water Quality Conditions Associated with Cattle Grazing and Recreation on National Forest Lands." Their findings tell a very different story than the data included in the listing proposal. In summary:

- Relative to USEPA's national E. coli fecal indicator bacteria (FIB) benchmarks—the most contemporary and relevant standards for this study—over 90% of the 743 samples collected in the study were below recommended criteria values.
- FIB concentrations were significantly greater when stream flow was low or stagnant, water was turbid, and when cattle were actively observed at sampling.
- Recreation sites had the lowest mean FIB, total nitrogen, and soluble reactive phosphorus concentrations, and there were no significant differences in FIB and nutrient concentrations between key grazing areas and non-concentrated use areas.
- The results suggest cattle grazing, recreation, and provisioning of clean water can be compatible goals across these national forest

lands.

Thank you for the opportunity to comment

Kevin Wright  
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