

DATE: October 18,2016

Sent via e-mail

TO: Jay.Simi@waterboards.ca.gov

FROM: Eloise Fischer efischer1@hotmail.com

RE: Comments on Proposed 303(d) List Revisions

Dear Mr. Simi:

My comments are relating to the Central Valley Regional Water Quality Control Board's (CVRWQCB's) proposed revisions to the 2012 Clean Water Act Section 303(d) list of impaired water bodies.

The six water bodies in question are:

- Bell Creek
- Bull Meadow Creek
- Jawbone Creek
- Jawbone Creek, unnamed tributary
- Niagara Creek
- Rose Creek

All of these water bodies are within the Stanislaus National Forest in Tuolumne County.

The Water Board is far too hasty in proposing to list these water bodies. The data used to support the proposal is all from a single source—a source that has voiced their opposition to livestock grazing in the upper elevations of the Stanislaus National Forest. The Board is only using monitoring data collected before 2010. Since that time University of California Davis researchers have collected samples and published their findings in a peer-reviewed study—“Water Quality Conditions Associated with Cattle Grazing and Recreation on National Forest Lands”. These findings tell a very different story than the data that is being used to propose the listing.

This study can be found at:

<http://journals.plos.org/plosone/article/asset?id=10.1371%Fjournal.pone.0068127.PDF>

Summary of this peer-reviewed study:

1. Using USEPA's national E.coli fecal indicator bacteria (FIB) benchmarks, over 90% of the 743 samples collected were below recommended values.
2. There were no significant differences in FIB and nutrient concentrations between key grazing areas and non-concentrated use areas.
3. FIB concentrations were affected by low stream flow, turbidity and if livestock were actively observed at sampling.

Local stakeholders, private landowners and the community in general were not aware that a proposed listing was being considered even though they would be impacted.

Comments on Proposed 303(d) List Provisions from Eloise Fischer

October 17, 2016

Page 2

Livestock grazing was identified as a contributing factor for the proposed listings. Although they can be a contributing factor, wildlife far outnumber livestock in the watersheds. Until DNA markers are used to identify species, livestock cannot be identified as the only factor.

The proposal to list these water bodies is based on incomplete data and should be withdrawn until more data can be reviewed and more monitoring by other sources be completed.

Thank you for your careful consideration of my comments.

A handwritten signature in cursive script that reads "Eloise Fischer".

Eloise Fischer