

Tuolumne County
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**BOARD OF SUPERVISORS
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October 18, 2016

Via Email

Jay.simi@waterboards.ca.gov

Mr. Jay Simi
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, Suite 200
Rancho Cordova, CA 95670-6114

RE: 303(d) List Revisions

Dear Mr. Simi:

The Tuolumne County Board of Supervisors thanks the Central Valley Regional Water Quality Board for its interest in the health of the environment and residents of Tuolumne County. However, the Board of Supervisors would like to express its concern over the proposed additions to the 303(d) impaired water body list for the creeks found in cattle grazing allotments in Tuolumne County including Bell Creek, Bull Meadow Creek, Jawbone Creek, Niagara Creek, Rose Creek and a Tributary to Jawbone Creek due to fecal coliform and E. coli contamination.

The Board of Supervisors recognizes the State Water Board's need for consistency between Regional Water Boards and the resulting decision made to only evaluate water quality data through August 30, 2010 for the 2014 Integrated Report. The data in this report as submitted by the Central Sierra Environmental Resource Center (CSERC) shows contamination to these water bodies. However, more current data from Kenneth Tate and Leslie Roche from the UC Davis Cooperative Extension (accessed here: <http://tinyurl.com/ja4clm3>) shows little or no contamination in these water bodies from E. coli.

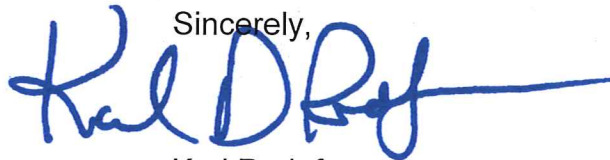
Cattle grazers depend on their high country allotments to sustain their business; furthermore, livestock production is the leading agricultural commodity in Tuolumne County. Though the contamination has not been directly linked to the surrounding cattle

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grazing allotments, it is clear from the datasheets submitted by CSERC that there is an attempt to make that connection. Without additional testing, this conclusion is spurious. The Board of Supervisors is concerned about potential actions resulting from this 303(d) listing that may restrict or impact permittees in grazing allotments when research does not support those conclusions.

While recognizing the data from UC Davis falls outside the time frame for water quality evaluation, prior to the decision to add these water bodies to the 303(d) list, the Board of Supervisors requests an additional analysis of these water bodies be conducted by all stakeholders to address the disparity between the two data sets. The Tuolumne County Board of Supervisors also requests to remain involved and plans to continue its engagement in this process. Thank you for considering these requests.

Sincerely,



Karl Rodefer
Chairman

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

ALICIA L. JAMAR
Clerk of the Board

By: 