

Tuolumne County Farm Bureau
77 N. Washington St.
Sonora, CA 95370

10-19-16

RE: 303(d) List Revisions

Dear Mr. Simi,

I am writing you today on behalf of the Tuolumne County Farm Bureau. Many of our 450 members are directly involved in production agriculture, or agricultural support services. Our goal is to protect and promote sound agricultural practices in Tuolumne County. Our producers care greatly for their animals, crops, and the land that we take care of. Many of our members graze cattle on the Stanislaus National forest, harvest timber, and own property and water rights in the national forest. Combined, we have hundreds of years of practice in being good stewards of the land and watersheds. For nearly 200 years, this forest land has been subject to timber harvests, mining, and cattle grazing that still continues today.

Tuolumne County Farm Bureau is adamantly opposed to the addition of Bell Creek, Bull Meadow Creek, Jawbone Creek, Jawbone Creek unnamed tributary, Niagara Creek, and Rose Creek to the CVRWQCB 303(d) list. The mere fact that we are even having this discussion is pure lunacy. CSERC, the radical environmental organization that produced the data, has an extreme vendetta against cattle grazing on the forest. They proudly proclaim their vitriol for cattle grazing on their website, <http://www.cserc.org/local-issues/forests/national-forest-issues/livestock-grazing/>. After reviewing the site selection, sampling methods, and the lack in care of handling the samples, the results should be rejected. There is not one ounce of scientific methodology or objectivity in CSERC's study. Their methodology was skewed to produce their desired outcome.

For each of the proposed listings, livestock grazing is identified as the contributing factor, “the samples were collected after cows were present in the area.” Current evaluation guidelines for determining indicator bacteria don’t account for species identity for fecal coliform and E. coli. While livestock may be a contributing factor, wildlife far outnumber livestock, and some of the sampling locations were near popular human recreation areas. Livestock can not be identified as the sole factor until DNA based molecular markers are used to screen species.

This proposed listing will affect many private and public stakeholders who did not receive notification of the board’s possible actions. The proposed listings will have far reaching affects on people who never had a chance to be apart of the process. It also seems suspect that the board is only acknowledging pre 2010 data when a more up to date and scientific study exists and the data was produced from a single source who's permission to even conduct such a study is also in question.

By now, you must be aware that in 2013, University of California Davis researchers 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.

<http://journals.plos.org/plosone/article/asset?id=10.1371%2Fjournal.pone.0068127.PDF>

Since the evidence of extreme bias and slant is ever present from the single source that produced the data that has led to the possible listing, local stakeholders, the Forest Service, state and regional water board staff, UC Davis, and University of California Cooperative Extension are forming a water quality partnership that will address site-specific management practices designed to protect and enhance water quality. This partnership includes additional water quality sampling during 2016.

It is our position that the SWRCB would benefit greatly from a truly scientific study that includes the stake holders and academia. We have been stewards of the land for generations, and our members plan on continuing this legacy and way of life for generations to come. Overall forest health benefits greatly from cattle grazing and we are committed to sound practices for our forest and watersheds.

Sincerely



Shaun Crook

President

Tuolumne County Farm Bureau