

CALIFORNIA CATTLEMEN'S ASSOCIATION

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April 15, 2010

Mr. Gaylon Lee
Forest Activities Program Manager
State Water Resources Control Board

Mr. Barry Hill
Regional Hydrologist
United States Forest Service, Pacific Southwest Region

Dear Mr. Lee & Mr. Hill:

Generally, CCA accepts the proposed revisions that were made to the Rangeland Management Activities BMPs. However, after this first round of comments, if the Forest Service determines that new revisions are to be made to the BMPs, we would ask that you re-circulate the document to the stakeholder committee before making a final decision.

I would also like to make a few general comments. First, I think the revisions do a good job of depicting what the Forest Service is already doing to holistically manage grazing allotments and protect water quality. The various planning processes, analyses, etc. allow the Forest Service and the permittee to jointly address water quality issues, specific areas of concern and restoration activities. We don't believe that the current system needs to become more complex or added to, but better described in the BMPs which from our understanding the revisions do.

That being said, I do want to articulate one concern that we have relative to the perceived role upland conditions have on water quality. In some instances, management practices on upland conditions can have an impact on water quality, however this is certainly not unambiguous and is clearly on a case-by-case basis. In our view, there needs to be a direct link between driving management activities of upland conditions to impacts on water quality in order to the use the water quality BMPs specifically to trigger upland management actions. We just want to be clear that water quality BMPs focus specifically on water quality.

Should you have any questions, please don't hesitate to contact me.

Sincerely,

Justin Oldfield
Director of Regulatory Affairs

CC: Anne Yost, USFS

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