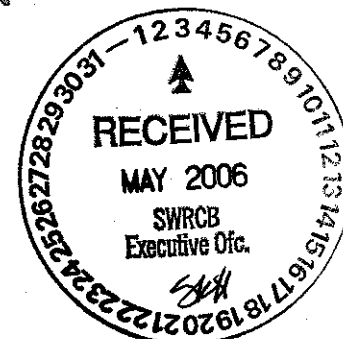


05/15/06 BMTg Item  
 Tomales Bay  
 Deadline: May 4, 2006

**POINT REYES SEASHORE RANCHERS ASSOCIATION**  
**P.O. BOX 1403 Pt. REYES, CA. 94956**

**MAY 3, 2006**

Song Her, Clerk to the Board  
 State Water Resources Control Board  
 1001 I Street  
 Sacramento, Ca. 95814  
 Fax: (916) 341-5620  
 RE: Comment Letter ---Pathogens in Tomales Bay



Dear Members of the California State Water Resources Control Board:

The Point Reyes Seashore Ranchers Association (PRSRA) is a group of ranchers who live and operate agriculture businesses within the Point Reyes National Seashore (PRNS). There are twenty-one business members of our association, nine of whom are located in the Tomales Bay watershed. The PRNS has owned the land that these businesses are on since the 1970's; and the PRNS and the ranchers have worked for the past thirty years to improve natural resources while continuing the cultural historic agriculture business. Over these years, water quality has been a high priority and riparian fencing and planting has been an ongoing process.

In 2004 the PRSRA, PRNS, University California Cooperative Extension (UCCE), Natural Resources Conservation Service (NRCS), Regional Water Quality Control Board (RWQCB), and Marin Environmental Protection Agency (MEPA) developed the Tomales Bay Total Maximum Daily Load (TMDL) Livestock Facility Checklist. This checklist will assist agriculture producers within the Tomales Bay Watershed with their efforts to improve water quality. Over the span of approximately 18 months, this document was applied and revised in the field, testing its applicability to assist land managers in identifying, managing, and reducing potential and existing non-point source pollution (NPSP) on grazed rangeland.

The California Regional Water Quality Board, San Francisco Bay Region (RWQCB--SF), in its Resolution R2-2005-0046 dated September 21, 2005, has proposed a Basin Plan Amendment in which the costs are as high as \$73 million and the benefits are questionable. It is not reasonable for RWQCB--SF to impose upon stake holders a \$73 million dollar cost to meet proposed water quality standards and state that "IF" water quality is still not met after spending this money then the RWQCB--SF will consider revising or re-evaluating the TMDL allocations without proper scientific evidence of contributors. In Moro Bay DNA studies were done and affected locations were targeted and dealt with.

In Tomales Bay, DNA studies should be conducted to remedy inadequate data, and poor science, that underly RWQCB--SF's proposed Basin Plan. The use of DNA testing in the Tomales Bay watershed will provide scientific evidence that can therefore be targeted with appropriate funds to resolve the water quality issue. The use of the TMDL Livestock Facility Checklist and DNA will enable each agriculturist to identify and deal with any and all water quality issues they may have. In this way, monies will be spent in the most needed locations, and guarantee success in improving water quality in the Tomales Bay watershed.

If you have any questions concerning these comments please contact Ted Melsaac (415) 663-1649, Bob McClure (415) 669-1206, Kevin Lunny (415) 669-1209, Amanda Wisby (415) 663-1362.

Sincerely,

Point Reyes Seashore Ranchers Association