



To: BOS_Legislative Assistants, cr_board_clerk Clerk Recorder/ClerkRec/COSLO@Wings,
Cc:
Bcc:
Subject: Fw: CCA Comments Re: GRAP
From: Board of Supervisors/BOS/COSLO - Wednesday 04/01/2015 10:38 AM
Sent by: Cytasha Campa/BOS/COSLO

----- Forwarded by Cytasha Campa/BOS/COSLO on 04/01/2015 10:37 AM -----

From: Kirk Wilbur <kirk@calcattlemen.org>
To: "boardofsups@co.slo.ca.us" <boardofsups@co.slo.ca.us>,
Date: 04/01/2015 10:35 AM
Subject: CCA Comments Re: GRAP

To whom it may concern:

Attached, please find the comments of the California Cattlemen's Association regarding Agenda Item 28 (Grazing Regulatory Action Project update) for next week's Board of Supervisors Meeting.

Best,

Kirk Wilbur
Director of Government Relations
California Cattlemen's Association



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CALIFORNIA CATTLEMEN'S ASSOCIATION

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April 1, 2015

Chair Debbie Arnold and Members
San Luis Obispo County Board of Supervisors
County Government Center, Room D-430
San Luis Obispo, CA 93408

Dear Chair Arnold:

The California Cattlemen's Association (CCA) is pleased to learn that the Board will hear an update on the State Water Resources Control Board's (SWRCB) proposed Grazing Regulatory Action Project (GRAP) during its April 7th meeting. CCA has staunchly opposed GRAP since the SWRCB formally announced the project in October of 2014, and we wish to share our concerns with the Board to help inform your GRAP update.

Though SWRCB has not released any specific regulatory proposal at this time, CCA remains concerned about the assumptions underlying SWRCB's assertion that grazing is a pervasive threat to California's waterways which justifies a statewide grazing regulation.

The SWRCB has not demonstrated a sound scientific basis for a statewide grazing regulation. SWRCB has suggested that grazing has significantly contributed to pathogen, nutrient, and sediment impairments of California's waterways, but the best available science is at odds with this assertion. According to the U.C. Davis Rangeland Watershed Laboratory, grazing is likely erroneously listed as a "potential source" of impairment for many waterways which are in fact impaired for reasons not typically attributable to grazing practices. SWRCB has also failed to account for significant "background" sources of impairment, such as pathogens from wildlife and high levels of nutrients, such as nitrogen, which occur naturally.

CCA is also concerned because SWRCB has failed to account for the significant proactive steps already voluntarily undertaken by the state's cattlemen to protect waterways adjacent to their grazing operations. A statewide grazing regulation has the potential to cause significant economic harm to cattlemen and the communities in which they live and work.

These are just a few of the many significant concerns the state's cattlemen have with the proposed GRAP. If the Board has any specific questions about GRAP or the ranching community's concerns with the project, please do not hesitate to contact the CCA office at (916) 444-0845.

CCA thanks the Board for its attention to this extremely troubling regulatory proposal, and we wish to specifically thank Ms. Compton and Mr. Mecham for their attendance and thoughtful comments at the January 9th GRAP listening session in San Luis Obispo.

Sincerely,

Kirk Wilbur
Director of Government Relations
California Cattlemen's Association

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Item No. 28
Meeting Date: April 7, 2015
Presented by: Kirk Wilbur

Rec'd prior to meeting & posted to web on: April 3, 2015