

**Proposed Statewide Grazing Regulatory Action Project (GRAP)
Stakeholder Focused Listening Session (FLS)
April 14, 2015**

Tribes

Stakeholders invited to participate in this session included representatives from federally and non-federally recognized California Native American Tribes. The complete list available by contacting State Water Resources Control Board – Office of Public Participation at http://www.waterboards.ca.gov/about_us/public_participation/index.shtml.

Note: The following bullet points summarize the range of opinions and concerns expressed by the invited stakeholders, and are not intended to reflect the position of the Water Boards or staff on any issue. Because they summarize all responses, any individual bullet point is not intended to reflect the opinions of any one stakeholder(s). The bullet points are not presented in any particular order.

How should we define grazing for the purposes of GRAP?

- Grazing should be defined as “animal eating grass” with no minimum number specified.
- There is no Water Board jurisdiction on tribal trust lands, so a definition is not relevant to these types of lands. However, a definition may be applicable to lands held in fee (i.e., leased tribal lands.)
- Per local California Cattleman’s Association, there are many concerns about a definition for grazing and its subsequent use that could result in more costs to grazing operations and/or impact availability of lands for grazing.

What would a successful regulatory program look like to you? In your experience, what types of management practices have been effective in protecting or improving water quality? How can we incentivize use of effective management practices?

- The program should use documented impairments as a starting point. However, consideration should be given to impairment based on current indicator bacteria standards as standards are too low and out of date. Also, currently, rangeland related impacts are only about 4% of all listed waters – a regulatory program is a “program looking for a problem.”

- A successful program should consider the best available rangeland and public health water quality science.
- The program should consider true threats to public health and the environment.
- It should consider economic viability of the grazing operations
- It should consider knowledge gained from thousands of years of rangeland management by Tribes.
- As fees are already between \$1 to \$15 per acre, any additional fees added by a regulatory program will result in a change in use of rangelands and a loss of the related environmental benefits of rangelands.
- A successful program will not regulate millions of acres of rangelands based on such a small number of impairments.
- Tribes have the best understanding of their lands and water resources and know how to best maintain them.
- The program should not overlap with other Water Board programs such as the Irrigated Lands Regulatory Program.
- Before any new program is proposed, more specificity is needed as to why a new program is even needed. Is it because there an issue in the Lahontan Region that needs to be addressed?
- Good water quality is something we all want but adding another layer of regulation will cause the ranching industry to fold. The industry is already currently being impacted by drought and wildfire.
- Programs in Regional Boards 1 and 2 should be used as models – these programs first verified impairment and also required compliance with the California Rangeland Management Plan.

In your experience, what types of monitoring have been effective in assessing water quality?

- Species specific bacteria testing should be used even though it is very expensive.
- Monitoring should be determined by use of the best available science.
- Current fecal coliform limits are not obtainable – any monitoring should use a different standard.
- Entities such as CA Fish and Wildlife should monitor and be held accountable for bacteria contributions from animals such as feral pigs and wild turkeys.
- A basic water quality monitoring program should be used (e.g., temperature, dissolved oxygen, conductivity) and include speciation for bacteria.
- Residual Dry Matter (RDM) should be included in any monitoring program as RDM provides the best filter to prevent water quality impacts.

What are the unusual or extreme circumstances that GRAP should consider as part of its regulatory program (e.g. weather, market conditions, wildfire, livestock diseases)?

- Seasonal spikes in bacteria or other constituents after major weather events should be considered.
- Impacts from wildlife should be considered.
- Drought and wildfire events should be considered.
- Flooding should be considered.

How can we best collaborate with all stakeholders regarding grazing and water quality?

- Input from county tax assessors should be considered as conversion of rangelands to some categories such as watershed will result in less tax revenue.

General Comments and Questions

- The majority of ranching operations are on leased lands. A small per acre fee will put many of them out of business.
- Please don't punish the "Good Actors".
- There is concern about water quality impacts from neighboring operations and who will be responsible for those operations.
- There is already a scarcity of rangelands; adding fees or other costs will squeeze out small ranch operators and also drive up the price for rangeland.
- Requiring cattle to be removed from public lands will degrade the resource.