



MARIN COUNTY FARM BUREAU

P.O. Box 219, Pt. Reyes, CA 94956

June 18, 2008

To: California Regional Water Quality Control Board
Re: Tomales Bay Watershed Grazing Waiver

Marin County Farm Bureau would like to make a few comments regarding the Tomales Bay Watershed Grazing Waiver. I would like to start by saying thank you for having worked with Western United Dairyman and the University of California Cooperative Extension office by listening to their valuable input on this matter. Ranchers in the watershed and surrounding Marin and Sonoma County areas have historically been excellent stewards of the land and I hope you recognize all of their hard work as this process moves forward.

First, under the Compliance Monitoring and Reporting I have some concerns about the "Pre-Storm", "during extended storms", and after "actual storms" inspections. This seems to be excessive and will become burdensome on our ranchers. Since you are looking at applying monthly inspections already it does not make sense to inspect again just a few days later if the meteorologists now say a storm might be coming. Also, "during storm" inspections are very difficult and will not give you much information. For example, if there is some erosion on a road during a storm, that erosion will still be noticeable after the storm. And during the storm there is nothing that you can do right then anyway, trying to fix it in the middle of the storm will only cause additional erosion. The key is to have effective post storm season inspections and if problems arise then solutions to fixing them should be added to the ranch plans.

Next, In the Notice of Intent Attachment A Section VI. Implementation of Waiver of WDRs Conditions: Clarification is needed. Part A seems appropriate if the grazer is already participating in a waiver program. Part C seems appropriate for those who already have a plan. If an applicant does not have a plan but will be developing one what does an applicant mark? Part D has what appear to be two duplicative options. Also, Attachment B seems to be more about what the ranch looks like than about grazing. There are lots of questions about road erosion, crop fields, creeks and riparian areas. Maybe we should help to clarify this part of the Grazing Waiver so that it is more about grazing.

Third, with regards to Mercury in the Walker Creek watershed, you state "To avoid the inadvertent discharge of mercury, grazing lands' landowners and lessees in the Walker Creek watershed downstream of the Gambonini Mine must incorporate management practices that minimize the discharge of mercury or the production of methylmercury."

I question whether there is sound science that proves that cattle grazing will increase the production of methylmercury. Have there been tests that show when cattle are in those fields more methylmercury is produced, perhaps the rainfall is all it takes to wash more mercury out of the soils.

Once again, thank you for taking our comments and I hope to work more with you on this in the future.

Regards,

Dominic Grossi
President,
Marin County Farm Bureau