



Ventura County Coalition of Labor, Agriculture and Business

P.O. Box 4237, Ventura, CA 93007

Email: execdirector@colabvc.org

www.colabvc.org

January 28, 2013

Jeanine Townsend, Clerk to the Board
State Water Resources Control Board
P.O. Box 100, Sacramento, CA 95812-2000
Submitted via email: commentletters@waterboards.ca.gov

RE: Comment Letter – Ventura River Algae TMDL

Dear Ms. Townsend,

VC COLAB is a business advocacy group with over 300 local Ventura County members including cattle ranchers, horse owners, irrigated landowners and supporting businesses. We have a unique perspective and are genuinely concerned about the effect of the Algae TMDL on the livelihoods and lifestyles of our members, many who live and work within the Ventura River watershed. We are supporting the efforts of the Horse and Livestock Watershed Alliance and the Cattlemen's Association in their analysis of this complicated document through our research and consulting scientists. While we believe there are opportunities for improvement to the watershed with the implementation of Best Management Practices (BMPs) under the Algae TMDL, we are concerned about prohibitive costs of discharge and receiving water monitoring for private individuals and small businesses who have been caught up in the process. We believe there is a lack of sufficient science to support the many assumptions and an insufficient analysis of the background water data to apply discharge limits to horse and intensive livestock facilities and grazing operations.

Our original written comments to the LARWQCB were in response to the first draft of the Algae TMDL. Subsequently there were many changes to the TMDL through a cooperative effort with Jenney Newman which we appreciate. However, since the final version was adopted there are a few issues due to the changes in language that we would like for you to consider. As a result we recommend the following changes:

1) Monitoring for cattle grazing to determine baseline loads need to allow for methods utilized in published studies:

While the TMDL allows the opportunity to "*utilize other acceptable data or studies*" to determine a baseline dry-weather pollutant load, (Page 14) there is a possibility that baseline monitoring would be required. In that case, we would like the opportunity to design a study as has been most successful in published data which measures loads in the same location in a stream with cattle and then with cattle removed. We would like the sentence on Page 15 "*Baseline monitoring may consist of water quality monitoring of sites impacted by grazing and compared to water quality monitoring from unimpacted natural background sites*" to be modified to "*Baseline monitoring may consist of water quality monitoring of sites impacted by grazing and compared to water quality monitoring from unimpacted natural background sites that compare streams with cattle to the same streams when cattle have been removed*".

2) **Receiving Water Monitoring should be required for the Horse, Intensive Livestock Facilities and Cattle Operations if the LARWQCB deems it necessary after the 10 year period described on Page 17:**

We recommend that the language on Page 17 be changed as follows: *“Conduct receiving water monitoring (if necessary) to assess numeric target attainment and measure in-stream nutrient concentrations.”*

In the vital Ojai horse community there is an effort to voluntarily work with the Resource Conservation District to implement BMPs to prevent nutrients from horse manure entering the creeks in dry and wet weather. However, there is concern about the cost of monitoring requirements leading to increased horse abandonment and the loss of horse programs. These include programs for the disabled and world recognized high-school horse programs that teach kids responsibility, problem-solving and friendship. The loss of horses in the Ojai Valley would be devastating to the community.

Cattle grazing is also a historic practice in the Ojai Valley and although it is rapidly diminishing due to business economics, it plays a vital role in the valley lifestyle. Proper range management leads to the preservation of grasslands that are essential to fire protection and provide habitat that support a variety of species in the watershed. A majority of the cattle ranchers already implement effective range management practices as they are essential to the continuing viability of their grazing operations and to the stewardship of their land.

We appreciate the opportunity to comment on this document and believe that this TMDL can be modified to be supportive of watershed protection goals while increasing cost effectiveness of solutions and maintaining the quality of life of the valley residents.

Sincerely,



Lynn Gray Jensen, P.G.

Executive Director

execdirector@colabvc.org

(805) 633-2291