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## San Francisco Bay Regional Water Quality Control Board

September 1, 2022

*Agenda item: TH10b*

Coastal Commission  
455 Market Street, Suite 300  
San Francisco, CA 94105  
*Sent via email to [EORFC@coastal.ca.gov](mailto:EORFC@coastal.ca.gov)*

**Subject:** Water Board Review of the National Park Service's First Year Version of the Water Quality Strategy for Management of Ranching Operations

Dear California Coastal Commissioners:

San Francisco Regional Water Quality Control Board (Water Board) appreciates the opportunity to review and comment on the National Park Service (NPS) Water Quality Strategy for Management of Ranching Operations (Strategy), developed in accordance with the California Coastal Commission's (Commission) conditional Consistency Determination concurrence for the 2020 General Management Plan Amendment for Point Reyes National Seashore and the North District of Golden Gate National Recreation Area.

At the request of NPS staff, we have reviewed the Strategy (first draft received on April 27, 2022) and provided guidance to help align the Strategy with our current regulatory approaches for ranching and water quality sampling methodology standards. As a first-year monitoring plan that will be refined as NPS implements the Strategy, we agree that it provides an adequate framework to assess and monitor current ranching activities and their potential impacts to water quality, and to inform management decisions.

### **Our Role and Responsibilities**

The Water Board's overall mission is to protect all surface water and groundwater within the nine-county San Francisco Bay Region by developing and implementing water quality plans and/or policies and by adopting and enforcing permits in accordance with the California Water Code or Clean Water Act. We do not have the authority to determine local land-use zoning and commercial business permitting outcomes.

In accordance with the 1990 amendments to the federal Coastal Zone Management Act, the State and Regional Water Boards partner with the Commission to implement a State-wide Coastal Nonpoint Source Water Pollution Control Program (CA Nonpoint Source Program). This program requires Water Boards to regulate all nonpoint sources of pollution, including agriculture sources, using our administrative permitting authority, utilizing "economically achievable" management measures.

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JAYNE BATTEY, ACTING CHAIR | EILEEN WHITE, EXECUTIVE OFFICER

Each dairy in our region, including the five operating within the Park, must comply with our [General Waste Discharge Requirements for Confined Animal Facilities](#) (CAF Order). The CAF Order regulates all discharges to land and prohibits any waste discharges to surface or groundwaters. It contains specific terms and conditions that must be met, including structural and non-structural management measures for minimizing impacts to water quality from confined animal areas, land application areas, and grazing lands.

Additionally, 10 of 18 NPS grazing operations are located within the Tomales Bay watershed and must comply with [a Conditional Grazing Waiver for the Tomales Bay Watershed \(Grazing Permit\)](#). The Grazing Permit includes the development of Ranch Water Quality Plans, implementation of conservation practices to minimize delivery of pathogens, nutrients and sediments to surface waters, annual monitoring, and annual adaptive management adjustments to the plans. We are currently revising our Grazing permitting program which will be applicable to all NPS grazing operations by next year.

As the issuing agency, we have the responsibility to enforce the CAF Order and Grazing Permit. We do this with periodic inspections and review of reports and plans. As the landowner, the National Park Service has the responsibility to hold its facility operators to standards that ensure compliance with water quality regulations and permits, assisting whenever possible.

### **Recent Actions**

In February, our staff conducted comprehensive inspections of the six NPS dairy ranches and assessed their CAF Order compliance status. One dairy has closed, three were determined to be complying, and the other two can meet the CAF Order standards by completing short- and long-term improvements identified during the inspections. The revised Strategy and interim ranch lease agreements incorporate these required actions and reflects an improved commitment by NPS staff to coordinate with us on timely corrective action implementation.

We continue to partner with NPS and Marin County staff to support the implementation of ranch improvement projects in response to our inspections and the recent identification of certain septic system inadequacies. However, it's important to note that CA Water Code Section 13360 prohibits us from specifying the design, location, type of construction, or particular manner of permit compliance and allows a permittee to comply in any lawful manner. Thus, we review proposed Ranch and Dairy plans and reports along with inspections to determine permit compliance.

We have reviewed the Strategy and find the proposed sampling methodologies, protocols, parameters and action triggers to be based on and consistent with the latest available regulatory approaches and standards.

In support of the CA Nonpoint Source Program, we help to administer the federal 319(h) grant program aimed to control nonpoint source pollutant sources such as agriculture, grazing and animal production. We intend to support and encourage local agencies to

apply for this and other available funding to help expedite and facilitate NPS ranch improvement plans to protect and enhance water quality.

**Summary**

Water quality impacts from dairies and grazing operations continue to be a Water Board priority. We appreciate the multi-agency collaboration to ensure the quality and use of our water resources is protected. We support the NPS in their implementation of this important Water Quality Strategy for Management of Ranching Operations and expect to actively engage with staff on a regular basis.

It has been demonstrated that collaboration between multiple agencies and landowners/operators to implement best management practices and monitoring programs can minimize and mitigate animal agriculture water quality issues. We are committed to continuing this focused effort in coordination with Commission staff, NPS staff and other partners such as the Marin Resource Conservation District, Marin Agricultural Land Trust, University of California Cooperative Extension, and the National Resource Conservation Service.

Sincerely,

Thomas Mumley  
Assistant Executive Officer