

From: Loden, Mo@Waterboards
To: Wolf, Kristina@BOF
Cc: Fiore-Wagner, Mary@Waterboards
Subject: Water Board Comments RE: Rx Herbivory White Paper
Date: Friday, August 30, 2024 1:45:30 PM
Attachments: [image001.png](#)

Warning: this message is from an external user and should be treated with caution.

Hi Kristina,

Thank you for the opportunity to review and provide feedback on the Rx Herbivory White Paper. Please find our comments outlined below:

- Water Board agrees with another commenter that the document might be more effective if it was more broadly directed to an audience that is considering prescribed grazing and not just aimed at foresters in the CAL FIRE Vegetation Management Program.
- Measures to protect water quality, under Best Management Practices on Pg 6, could be improved by the following.
 - Riparian zones are included in the 'environmentally sensitive areas' list, but rivers and streams should be included as well.
 - Clarify how buffer zones will be protected.
 - Specify buffer zone dimensions. See NRCS's 'width of strips' recommendations ([Contour Buffer Strips](#) and [Riparian Forest Buffer Strips](#)) or the CalVTP Standard Project Requirement HYD-3 Water Quality Protections from Prescribed Herbivory.
 - Provide details on the appropriate season, duration, and intensity of treatments.
 - The paper mentions a monitoring program to determine effectiveness, but we recommend providing more details pertaining to pre/post bare ground assessments and established post-project stubble height minimums. If post-prescribed grazing suitable conditions do not exist, how will that be handled?

Let me know if you have any questions on the above.

Thank you,

Mo Loden

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(Note: My normal work week is Tues-Fri)

From: Wolf, Kristina@BOF <Kristina.Wolf@bof.ca.gov>
Sent: Tuesday, August 13, 2024 4:18 PM
To: Loden, Mo@Waterboards <Mo.Loden@Waterboards.ca.gov>