## CALIFORNIA CATTLEMEN'S ASSOCIATION

SERVING THE CATTLE **COMMUNITY SINCE 1917**  3841 N. FREEWAY BLVD., SUITE #130, SACRAMENTO, CALIFORNIA 95834 CCA

PHONE: (916) 444-0845 FAX: (916) 444-2194 www.calcattlemen.org

Submitted via email to publiccomment@sdcounty.ca.gov

May 20, 2025

San Diego County Board of Supervisors 1600 Pacific Highway Fourth Floor, Room 402 San Diego, California 92101

Meeting Date: May 21, 2025 Agenda Item No. 9

Distribution Date: May 20, 2025

Batch No. 01

RE: Review Options to Promote and Expand Sustainable Cattle Grazing in the Unincorporated County (Item 09) – SUPPORT

#### Supervisors:

The California Cattlemen's Association appreciates the opportunity to address the San Diego County Board of Supervisors as you consider Supervisor Desmond's recommendation to "review options to promote and expand sustainable cattle grazing in the unincorporated County." CCA is a statewide trade association representing more than 1,700 California cattle producers who pride themselves on their good stewardship of the state's land, water, and wildlife resources, including 55 members served locally by our affiliate San Diego/Imperial Cattlemen's Association. CCA previously provided substantive recommendations to the County's Planning and Development Services Department regarding the matters recommended for evaluation by the County's Chief Administrative Officer under this agenda item; that July 22, 2024 letter is attached and hereby incorporated by reference.

CCA strongly supports the proposal that the County "evaluate...options to support the expanded use of cattle grazing as an ecosystem support strategy within the unincorporated areas of the County," including the development of criteria to exempt grazing operations from the County's Grading, Clearing, and Watercourses Ordinance. Should the Board direct the Chief Administrative Officer to conduct such an evaluation, **CCA** is eager and willing to participate in the proposed six-month "collaborative stakeholder engagement process" to assist the CAO in developing relevant findings and recommendations. CCA is particularly well-positioned to ensure that the County has access to the latest scientific literature regarding grazing management and the impacts of grazing to the County's natural resources; CCA can also assist in connecting the CAO with subjectmatter experts on these topics.

As described in more detail in the attached letter, well-managed livestock grazing has a wide array of benefits, including removing fire fuels and reducing wildfire-related greenhouse gas emissions, improving soil health and sequestering carbon in rangelands, and improving habitat for numerous native wildlife species throughout San Diego County. Additionally, several policy considerations favor a grazing exemption from the County's Grading, Clearing, and Watercourses Ordinance. CCA strongly encourages the Board to direct staff to explore options for expanding the use of cattle grazing over the next six months, and we look forward to further discussing these topics within the collaborative stakeholder engagement process – ensuring that the Board has all the

**RICK ROBERTI PRESIDENT** LOYALTON

**MIKE WILLIAMS** 

FIRST VICE PRESIDENT

ACTON

**MIKE SULPIZIO** FEEDER COUNCIL CHAIR **BRAWLEY** 

**BEV BIGGER** 

**TREASURER** 

**VENTURA** 

**BILLY GATLIN** EXECUTIVE VICE PRESIDENT **TEMPLETON** 

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**ATASCADERO** 

**JACK HOEKSTRA** SECOND VICE PRESIDENT FEEDER COUNCIL VICECHAIR **CALIPATRIA** 

necessary information to act appropriately in response to any recommendations ultimately brought forth by the Chief Administrative Officer.

Sincerely,

Kirk Wilbur

Vice President of Government Affairs

Who low

CC: Andrew Potter; Executive Officer/Clerk of the Board of Supervisors;

Andrew.Potter@sdcounty.ca.gov

Hunter McDonald; Policy Advisor for Land Use; <a href="https://example.com/Hunter.Mcdonald@sdcounty.ca.gov">Hunter.Mcdonald@sdcounty.ca.gov</a>

## CALIFORNIA CATTLEMEN'S ASSOCIATION

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PHONE: (916) 444-0845 FAX: (916) 444-2194 www.calcattlemen.org

Submitted via email to grace.bodenchak@sdcounty.ca.gov

July 22, 2024

Planning and Development Services County of San Diego Attn: Grace Bodenchak 5510 Overland Avenue, Suite 210 San Diego, CA 92123

RE: Notice of Preparation for a Supplemental Environmental Impact Report Regarding Proposed Amendment to San Diego County's Grading, Clearing and Watercourses **Ordinance** 

Ms. Bodenchak:

The California Cattlemen's Association (CCA) appreciates the opportunity to provide scoping comments as San Diego County prepares to undertake a Supplemental Environmental Impact Report to assess proposed amendments to the County's Grading, Clearing, and Watercourses Ordinance. CCA is a statewide trade association representing more than 1,700 California cattle producers who pride themselves on the superb stewardship of the state's land, water, and wildlife resources, including 55 members served locally by our affiliate San Diego/Imperial Cattlemen's Association.

As the County reassesses the Grading, Clearing, and Watercourses Ordinance, CCA respectfully requests that the Ordinance be amended to more broadly exempt livestock grazing from the County's existing agricultural clearing permit process. While we understand that grazed lands which have been in agricultural production in the prior five years are currently exempted from the permit requirement, we believe this temporal limitation is unnecessary as applied to livestock grazing, and for the reasons discussed below request an outright exemption from the permitting requirement for agricultural clearing via grazing. Additionally, CCA proposes various clarifying amendments to the Ordinance.

### THE COUNTY SHOULD CORRECT AND CLARIFY PROVISIONS OF THE GRADING, CLEARING, AND WATERCOURSES ORDINANCE

As CCA staff researched the Grading, Clearing, and Watercourses Ordinance, several potential sources of ambiguity were identified. Firstly, several cross-references within the Ordinance appear to have not been updated after the most recent amendment in 2022, resulting in inaccurate referents within the Ordinance. Secondly, the manner in which the agricultural grading and agricultural clearing provisions of the code are written produce potential ambiguity regarding the application of the "Tilling and cultivating" permit exemption. While County staff may well have already identified these sources of ambiguity, they – and their potential resolutions – are identified below out of an abundance of caution in hopes of facilitating clarity in the current amendment process.

STEVE ARNOLD **PRESIDENT** SANTA MARGARITA

RICK ROBERTI

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LOYALTON

JOE DAN CAMERON FEEDER COUNCIL CHAIR **BRAWLEY** 

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**MIKE SULPIZIO** SECOND VICE PRESIDENT FEEDER COUNCIL VICECHAIR **CALIPATRIA** 

## A. Correct Mislabeled Cross-References in the Ordinance Resulting from the 2022 Amendment

Prior to 2022, the permit exemption for "Tilling or cultivating land exclusively for agricultural production" was located at § 87.202(d). In an effort "to consolidate the regulations related to Agricultural Grading and Clearing into a single chapter while maintaining existing requirements, clarifying language, and adding missing definitions," the Board in 2022 moved that exemption to a newly-created Chapter 9 of the County of San Diego Grading Ordinance, specifically to § 87.905.

Unfortunately, references to former § 87.202(d) and the subdivisions following it do not appear to have been updated elsewhere in the Grading, Clearing, and Watercourses Ordinance. To resolve this issue, we recommend the following amendments:

- Replace references to "Section 87.202(d)" in § 87.502(g) and § 87.803(1) with references to "Section 87.905";
- Make the following amendments to § 87.604(b):

"In addition, Section 87.603 does not apply to grading which is exempt from the requirement to obtain a grading permit under <u>Section 87.905 or under</u> one or more of the following paragraphs of Section 87.202 of this Division:

(1) Sec. 87.202(d): Specified agricultural tilling or cultivating.

(2)(1) Sec. 87.202(e)(d): Specified utility construction.

(3)(2) Sec. 87.202(f)(e): Emergency watercourse grading.

(4)(3) Sec. 87.202(g)(f): Specified surface mining operations."; and

• Amend § 87.502 to read "or which are exempt from a grading permit requirement pursuant to Section 87.202, paragraph (b), (c), (f)(e) or (g)(f) of this Division."

### B. Clarify that the Exemption in § 87.905 Applies to Agricultural Clearing

The permit exemption in § 87.905 relating to "Tilling or cultivating land exclusively for agricultural production" currently only *explicitly* applies that exemption to "the requirements to obtain an agricultural *grading* permit" under § 87.904 (*emphasis added*). While § 87.903 relative to "Agricultural clearing" specifies that "the standards for issuance of the [agricultural clearing] permit shall be the same as those specified in Section 87.904 of this Division [regarding agricultural grading permits]," nothing in § 87.903, § 87.904, or § 87.905 explicitly relate the "exemption from permit requirement" contained in § 87.905 to agricultural clearing.

For clarity, CCA suggests the following amendment to § 87.905 to clarify that the exemption applies to agricultural clearing activities:

"The following are exempt from the requirements to obtain an agricultural grading permit under § 87.904 or an agricultural clearing permit under § 87.903 (but not from other requirements of this Division including, but not limited to, the maximum

<sup>&</sup>lt;sup>1</sup> See, e.g., San Diego County, Cal., Ordinance No. 9364 (N.S.) (Mar. 24, 2004).

<sup>&</sup>lt;sup>2</sup> San Diego County, Cal., Ordinance No. 10804 (N.S.) (Aug. 17, 2022).

slope, required setbacks, erosion prevention and planting requirements), provided they do not occur in or affect a watercourse or are within one of the exemptions under Section 87.604 of this Division:"

# II. SAN DIEGO COUNTY SHOULD EXPAND THE AGRICULTURAL CLEARING PERMIT EXEMPTION AS IT RELATES TO GRAZING

The current Grading, Clearing, and Watercourses Ordinance exempts from permitting requirements "Tilling or cultivating land exclusively for agricultural production" so long as four prerequisites are met, including that "the land to be tilled or cultivated has been in agricultural production for at least one of the preceding five years." While the term "cultivated" is not defined in the Ordinance (and "The raising of livestock" appears to be treated separately from "The cultivation and tillage of the soil" under the section of the Ordinance defining relevant terms), 4 CCA understands from San Diego County ranchers that County practice is to regulate livestock grazing under the Ordinance in accordance with the provisions applicable to "Tilling or cultivating land."

CCA requests that § 87.905 be amended to add a new permit exemption specifically for "grazing" as that term is defined in § 87.803(24), and that no five-year limitation be applied to the livestock grazing exemption (or, in the alternative, that the existing exemption be amended to explicitly exempt grazing without imposing the five-year limitation currently applicable to other forms of "Tilling and cultivating land").

Several factors favor this broader grazing exemption: (1) the current Ordinance implicitly recognizes that grazing has a lower "intensity of land disturbance" than other agricultural activities, (2) livestock grazing mimics natural processes on rangelands for which no permit is required, (3) well-managed livestock grazing avoids the public safety concerns for which the Ordinance was drafted, and (4) livestock grazing promotes several environmental benefits which should be considered as the Ordinance is amended.

# A. The Current Ordinance Implicitly Recognizes the Low-Intensity Disturbance of Livestock Grazing

The Grading, Clearing, and Watercourses Ordinance clarifies that the permit exemption for "Tilling or cultivating land" does *not* apply in instances of "conversion of land previously used solely for grazing...to other types of agricultural operations which involve a greater intensity of land disturbance, such as planted crops." This provision of the Ordinance is an implicit recognition that livestock grazing is a lower-intensity use of the land than other "Tilling or cultivating" activities exempted from the grading and clearing permitting requirements under the Ordinance. Given that grazing is a lower-intensity agricultural use than other exempted agricultural activities, livestock grazing activities ought to be afforded more flexibility under the Ordinance.

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<sup>&</sup>lt;sup>3</sup> SAN DIEGO COUNTY, CAL. CODE OF ORDINANCES § 87.905(a) (2022).

<sup>&</sup>lt;sup>4</sup> Id. at § 87.803(2)(a)-(b) (2022) (defining "Agricultural Operations").

<sup>&</sup>lt;sup>5</sup> *Id.* at § 87.905(a)(2)(cc) (2022).

### B. Grazing Mimics Natural Processes for Which No Permit is Required

San Diego County was historically home to significant populations of grazing animals, including pronghorn, Southern mule deer, and Bighorn sheep. Today, all but the easternmost stretches of the County remain habitat for mule deer and the eastern half of the County is considered Bighorn sheep range.

While some of these historic grazers are no longer present in San Diego County (such as pronghorn) or have declined in abundance compared to historic population levels, managed livestock grazing mimics the environmental effects of these native species and provides vital benefits to the landscape.<sup>9</sup>

Unlike other "Tilling and cultivating" activities which may artificially disturb the landscape, livestock grazing mimics natural, historic, and ongoing grazing patterns of native species such as mule deer and Bighorn sheep. San Diego County's land and vegetation is naturally adapted and suited to grazing; just as no clearing permit is needed for the natural grazing of Bighorn sheep or mule deer, no clearing permit ought to be required for managed livestock grazing which closely mimics the natural processes of those once-abundant grazers.

# C. Managed Livestock Grazing Mitigates the Concerns Sought to be Addressed by the Grading, Clearing, and Watercourses Ordinance

The County's Grading, Clearing, and Watercourses Ordinance appears to be responsive primarily to concerns about soil stability. According to the County's Environmental Initial Study for the proposed Ordinance amendment, "The...Ordinance...was initially adopted...to establish regulations and procedures for permitting earth movement (grading) and removing vegetation (clearing) to ensure public safety by preventing slope failure, foundation failure, expansive soil damage, and erosion and drainage problems." <sup>10</sup>

While historic *over*grazing could detrimentally impact soil quality and stability, well-managed grazing avoids these impacts and can indeed improve soil quality. In collaboration with federal agencies such as the Natural Resources Conservation Service or local livestock and natural resources experts like those in the University of California Cooperative Extension system, livestock producers routinely incorporate into their grazing programs best management practices intended to prevent soil erosion and improve soil quality.

<sup>&</sup>lt;sup>6</sup> Tom Oberbauer, *Botany in San Diego County Before European Contact*, CAL. NATIVE PLANT SOC'Y, SAN DIEGO CNTY. CHAPTER (Feb. 13, 2018).

<sup>&</sup>lt;sup>7</sup> CAL. DEP'T OF FISH & WILDLIFE, CALIFORNIA WILDLIFE HABITAT RELATIONSHIPS SYSTEM: MULE DEER (2006), available online at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2638.

<sup>&</sup>lt;sup>8</sup> CAL. DEP'T OF FISH & WILDLIFE, CALIFORNIA WILDLIFE HABITAT RELATIONSHIPS SYSTEM: BIGHORN SHEEP (2008), available online at https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=2642.

<sup>&</sup>lt;sup>9</sup> See, e.g., <sup>10</sup> County of San Diego Planning & Development Services, Environmental Review Update Checklist Form For Projects with Previously Approved Environmental Documents for Purposes of Consideration of County of San Diego Grading, Clearing, and Watercourses Ordinance Amendment, PDS2021-POD-21-005 3 (June 20, 2024).

<sup>&</sup>lt;sup>10</sup> COUNTY OF SAN DIEGO PLANNING & DEVELOPMENT SERVICES, ENVIRONMENTAL REVIEW UPDATE CHECKLIST FORM FOR PROJECTS WITH PREVIOUSLY APPROVED ENVIRONMENTAL DOCUMENTS FOR PURPOSES OF CONSIDERATION OF COUNTY OF SAN DIEGO GRADING, CLEARING, AND WATERCOURSES ORDINANCE AMENDMENT, PDS2021-POD-21-005 3 (June 20, 2024).

As The Nature Conservancy has noted, "the common cow" today bestows upon the soil the same benefits historically conferred by other grazing species: trimming grasses; stirring the soil with their hooves to push seeds and dead plant matter into the soil, spurring new growth; and fertilizing the soil with their urine and manure.<sup>11</sup>

Indeed, managed livestock grazing often improves soil quality as compared to ungrazed landscapes. Research has demonstrated, for instance, that ungrazed native range can have "low soil quality [resulting from]...a dense litter mat lying on the soil surface that is not being incorporated into the soil profile." Moderate grazing, on the other hand, can foster the "development of excellent porosity and soil organic matter" and can increase water and root penetration into the soil. <sup>13</sup>

# D. The Supplemental Environmental Impact Report Should Consider the Significant Environmental Benefits of Livestock Grazing

The County's Environmental Initial Study identifies several environmental topics that necessitate additional analysis as the County considers amending the Ordinance. Scientific research demonstrates that livestock grazing has significant benefits relative to several of these issue areas. Given that the current need to obtain a clearing permit to graze lands not in agricultural production in the past five years likely acts as a disincentive to grazing those lands, CCA believes that the County should assess what impact *removing* that disincentive would have upon those environmental topics. Specifically, removing the clearing permit requirement for grazing would foster additional environmental stewardship of San Diego County rangelands which would benefit wildfire resilience, greenhouse gas emission reductions, air quality, and biological resources.

#### 1. Wildfire

Recent research has demonstrated that cattle grazing can greatly enhance wildfire resilience. In the South Coast Region, which includes San Diego County, cattle remove on average 401 pounds per acre of non-woody plant material which would otherwise provide potential fuel for wildfires. <sup>14</sup> This reduction of fire fuel loads via grazing is "enough to lessen fire hazards in many grazed areas." <sup>15</sup> When wildfires *do* break out on grazed rangelands, "these fuel reductions lower flame lengths[] and lead to more manageable wildfires." <sup>16</sup> In fact, California Natural Resources Secretary Wade Crowfoot remarked last year that "grazing is one of the…single best things we can do for wildfire resilience across the state" and spoke to the importance of an "increasing amount of funding – wildfire resilience funding – getting into sustainable grazing to keep those grasses low." <sup>17</sup>

<sup>11</sup> 

 $<sup>^{12}</sup>$  J. Wolk et al., Soil Health in Relation to Grazing, NORTH DAKOTA STATE UNIVERSITY CENTRAL GRASSLANDS RESEARCH EXTENSION CENTER (2003).

<sup>&</sup>lt;sup>13</sup> *Id*.

<sup>&</sup>lt;sup>14</sup> Felix Ratcliff et al., Cattle Grazing Reduces Fuel and Leads to More Manageable Fire Behavior, 76 CAL. AGRIC. 60, 64 tbl. 1 (2022).

<sup>&</sup>lt;sup>15</sup> *Id.* at 60.

<sup>16</sup> Id

<sup>&</sup>lt;sup>17</sup> RootsOfChangeNetwork, *Meat Summit Panel 1 commentaries*, YOUTUBE (July 14, 2023), https://www.youtube.com/watch?v=RxodeG41ZfI (beginning at 3:57).

#### 2. Greenhouse Gas Emissions

While livestock emit methane via enteric fermentation, research demonstrates that the management of fire fuels via livestock grazing (discussed above) results in a net benefit in terms of greenhouse gas (GHG) emissions reductions. As a study published last year noted, "After accounting for the production of methane and nitrous oxide emitted by cattle consuming...forage, there is a modest reduction in [carbon dioxide equivalents] associated with grazing in grasslands that burn." Given that "Grazing and associated ranch management practices... can slow or stop shrub encroachment into grasslands," the long-term GHG emissions-reduction benefits of livestock grazing may be even greater, as burned grasslands result in lower GHG emissions than burned shrublands. <sup>19</sup>

In addition to providing a net-benefit in avoided GHG emissions via grazing of fire fuels, livestock grazing can mitigate climate change via carbon sequestration.<sup>20</sup> Specifically, grazing can increase soil organic matter and stimulate plant growth, enhancing carbon sequestration in perennial roots and in the soil.<sup>21</sup>

### 3. Air Quality

As discussed above, livestock grazing reduces the incidence and severity of wildfires. In addition to diminishing GHG emissions, avoided wildfire via livestock grazing has significant benefits for air quality. Wildfire emissions can elevate the concentration of harmful, inhalable particles with diameters of 2.5 micrometers and smaller (PM<sub>2.5</sub>) in the air.<sup>22</sup> Research published last year finds that "cattle grazing can mitigate PM<sub>2.5</sub> emissions associated with grassland wildfires" and that "strategic grazing of grasslands that are proximate to or upwind of population centers can help ensure that these PM<sub>2.5</sub> reductions provide the most benefit for public health."<sup>23</sup> In the South Coast region, which includes San Diego County, researchers found that livestock grazing on subsequently-burned rangelands prevented an average of 0.4 metric tons of PM<sub>2.5</sub> emissions per year.<sup>24</sup>

#### 4. Biological Resources

Livestock grazing enhances habitat for a wide array of grassland birds, butterflies and other pollinators, small mammals, and amphibians. Research has found, for instance, that livestock grazing directly improves habitat for the following species which are found in San Diego County (according to the California Department of Fish and Wildlife's California Wildlife Habitat Relationships System): Grasshopper sparrows, Savannah sparrows, California ground squirrels, Kit fox, and

<sup>&</sup>lt;sup>18</sup> Felix Ratcliff et al., Cattle Grazing Moderates Greenhouse Gas and Particulate Matter Emissions from California Grassland Wildfires, SUSTAINABILITY 11 (2023).

<sup>&</sup>lt;sup>19</sup> *Id.* at 1, 11-12.

<sup>&</sup>lt;sup>20</sup> Ryan C. Byrnes et al., A Global Meta-Analysis of Grazing Impacts on Soil Health Indicators, 47 J. ENV'T QUALITY 758, 758 (2018).

<sup>&</sup>lt;sup>21</sup> Stephanie Larson, *Carbon Sequestration on Rangelands: Addressing Climate Change*, UNIVERSITY OF CALIFORNIA DIVISION OF AGRICULTURE AND NATURAL RESOURCES (2017).

<sup>&</sup>lt;sup>22</sup> Ratcliff, *supra* note 18, at 2.

<sup>&</sup>lt;sup>23</sup> *Id.* at 12.

<sup>&</sup>lt;sup>24</sup> *Id.* at 7.

California red-legged frog.<sup>25</sup> (This is a non-exhaustive list of San Diego County wildlife which benefit from livestock grazing; as the County moves forward in amending the Ordinance, CCA is happy to provide additional examples of County wildlife which thrive in the presence of livestock grazing.)

Given the demonstrated benefits of livestock grazing on wildfire resilience, greenhouse gas emissions reductions, air quality, and biological resources, San Diego County should assess whether broadly exempting livestock grazing from the County's clearing permit requirements – and thus removing an obstacle to treating rangelands via livestock grazing – would bestow benefits relative to these environmental topics.

# E. An Agricultural or Grazing Exemption is Consistent with Nearby Counties' Clearing Ordinances

Several other counties have considered whether livestock grazing should necessitate an application for a clearing permit and have answered in the negative.

For example, neighboring Riverside County exempts from its grading permit requirements "agricultural grading or clearing," defined as "The raising of crops or animals exclusively for commercial agricultural purposes." While those engaging in "agricultural grading or clearing" may be required to file an Agricultural Grading/Clearing Certificate and file applicable fees, the County clarifies that "land [that] has been farmed within the preceding five (5) year... is exempt under the ordinance, and the Agricultural Grading/Clearing Certificate (Certificate) is optional." Riverside County's process provides an example of how San Diego County might still obtain information regarding agricultural clearing (and capture a modest fee) while sparing ranchers the costly and onerous requirement of obtaining an agricultural clearing permit.

San Bernardino County likewise exempts "Agricultural Activities" from the County's Soil and Water Conservation permitting requirements which govern grading and clearing activities. Under San Bernardino County's ordinance, "Agricultural grading and routine agricultural activities," which include "routine clearing to maintain existing rangeland," are exempt from the requirement to obtain a land use permit or Soil Erosion Permit.<sup>28</sup>

Given that County staff have already reviewed the "practices, legal requirements, stakeholder comments, and fiscal implications" of the manner in which other counties have "streamline[d] the Agricultural Clearing process," <sup>29</sup> CCA will refrain from further analyzing other jurisdictions' approaches in this scoping letter. However, given that such analysis has already been conducted by San Diego County staff, CCA requests that such analysis be included in the County's draft Supplemental Environmental Impact Report to better inform the public's assessment of the County's proposed amendments to the Ordinance.

<sup>&</sup>lt;sup>25</sup> Sheila Barry, Understanding Working Rangelands: The Benefits of Livestock Grazing California's Annual Grasslands, UNIVERSITY OF CALIFORNIA DIVISION OF AGRICULTURE AND NATURAL RESOURCES (2015).

<sup>&</sup>lt;sup>26</sup> RIVERSIDE COUNTY, CA CODE § 15.04.080(C)(5)(17).

<sup>&</sup>lt;sup>27</sup> COUNTY OF RIVERSIDE TRANSPORTATION AND LAND MANAGEMENT AGENCY BUILDING AND SAFETY DEPARTMENT, *Agricultural Grading/ Clearing Certificate Exemption Form* (2021).

<sup>&</sup>lt;sup>28</sup> SAN BERNARDINO COUNTY, CA CODE OF ORDINANCES § 88.02.030(b).

<sup>&</sup>lt;sup>29</sup> COUNTY OF SAN DIEGO BOARD OF SUPERVISORS, Minute Order No. 6: Receive and Provide Direction on Amending the Grading, Clearing, and Watercourses Ordinance to Streamline the Agricultural Clearing Permit Process (May 19, 2021).

#### **III.CONCLUSION**

CCA greatly appreciates the opportunity to provide feedback to the County as it initiates amendments to the Ordinance. We are hopeful that the County's draft Supplemental Environmental Impact Report will carefully consider the benefits of exempting livestock grazing from existing agricultural clearing permit requirements, and we look forward to providing additional feedback to the County once the SEIS is complete.

Sincerely,

Kirk Wilbur

Vice President of Government Affairs



#### May 20, 2025

San Diego County Board of Supervisors 1600 Pacific Highway, Room 335 San Diego, CA 92101

Dear San Diego County Board of Supervisors,

On behalf of the San Diego County Cattlewomen, I am writing to express our support for the continued practice of responsible cattle grazing in San Diego County. As women involved in ranching and agriculture, we recognize the importance of grazing as a sustainable and vital practice for our county's land management, wildfire prevention, and agricultural economy.

San Diego County faces significant wildfire risks, and grazing cattle plays a critical role in mitigating these dangers. By maintaining controlled grazing, we are able to reduce the build-up of dry, flammable vegetation that contributes to the spread of wildfires. Grazing helps create firebreaks and manage fuel loads, reducing the intensity and spread of wildfires in rural and urban interface areas. This proactive approach helps safeguard our communities, natural resources, and our ranching operations.

In addition, grazing is an essential tool for enhancing biodiversity. It helps prevent the overgrowth of certain invasive plants while allowing native grasses and other species to thrive. This balance promotes the land's and its wildlife's overall health, benefiting the county's natural ecosystems and contributing to a sustainable, healthy environment.

Cattle grazing, when practiced responsibly, enhances the quality of our soil and improves water conservation efforts. The manure left behind by cattle naturally fertilizes the soil, enriching it with organic matter and improving its structure. This leads to healthier pasturelands and more productive rangelands. Furthermore, grazing helps manage water runoff and reduces soil erosion by improving water infiltration and retention, critical concerns in a drought-prone region like San Diego.

Through sustainable grazing practices, ranchers can ensure that their land remains healthy and resilient, even during times of water scarcity. This sustainable approach allows us to continue to care for the land while conserving vital water resources.



As members of the San Diego County Cattlewomen, we understand that cattle grazing is not just a livelihood, but a cornerstone of our local agricultural community. The revenue generated through cattle ranching helps sustain rural economies, supports local businesses, and ensures the preservation of our agricultural heritage.

Moreover, the demand for locally produced grass-fed beef is growing, and grazing allows ranchers to meet this demand in an environmentally responsible way. By continuing to support grazing, we are ensuring that our ranching community can thrive while also contributing to the broader agricultural economy in the county and beyond.

Ranching is deeply woven into the fabric of San Diego County's culture. For many of us, it's more than just a profession; it's a way of life passed down through generations.

Responsible grazing practices not only allow us to continue ranching but also help preserve the rural landscapes and communities that define our county.

As Cattlewomen, we are dedicated to ensuring that future generations can continue to work the land and carry on ranching traditions. Supporting cattle grazing is an essential part of that effort.

We urge the San Diego County Board of Supervisors to continue to support and advocate for the responsible practice of cattle grazing as an integral part of our land management, agricultural economy, and wildfire mitigation efforts. With proper stewardship, grazing can help maintain the health of our ecosystems, sustain our local ranching families, and preserve the cultural identity of the San Diego County backcountry for years to come.

Thank you for your time and consideration.

Sincerely,

### **Ashley Sinderud**

President, San Diego County Cattlewomen