

CALIFORNIA CATTLEMEN'S ASSOCIATION

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Mr. Jim Kellogg, President
California Fish and Game Commission
1416 Ninth Street, Room 1320
Sacramento, CA 95814

**RE: Proposed Amendments to Section 238.5, Title 14, CCR, RE: Stocking of
Aquaculture Products**

Dear President Kellogg:

The California Cattlemen's Association (CCA) is writing to express concern regarding an item slated to be heard during the December 15th Fish and Game Commission meeting, relating to proposed stock pond regulations.

CCA represents thousands of ranchers; owners and managers of over 34 million acres of California's landscape. Many of these landowners stock fish in their private lakes and ponds for their own personal use, something they have been doing responsibly for decades. According to the State Water Resources Control Board, there are over 20,000 private ponds in California. As the proposed amendments to Section 238.5, Title 14, CCR are currently written, a majority of these 20,000 ponds would fall subject to onerous and costly permitting rules, forcing ranchers to expend resources in an area that does nothing to benefit either the environment or the economy.

In a time when California, as well as the rest of the country, is facing economic hardship, regulatory burdens that do nothing to aid in the production of goods or services should be reconsidered. Not only does this proposed regulation divert resources from production, but goes beyond what may otherwise be a reasonable goal.

While it is understood that these changes are being proposed in response to a lawsuit against DFG related to their fishery management, this new rule not only seeks to unnecessarily elaborate upon existing protocols which provide for adequate safety measures, but greatly exceeds the solution provided by the court.

CCA supports the joint effort of the aquaculture industry and the Department of Fish and Game (DFG) to craft a solution acceptable to both industry and DFG's environmental concerns on aquaculture/stocking issues and encourages the commission to work with stakeholders to craft a reasonable and effective solution.

Sincerely,

Margo Parks
Associate Director of Government Relations



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