

UFRWGGroup**Upper Feather River Watershed Group***Agricultural Stakeholders Advancing Water Stewardship*PO Box 975
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May 22, 2015

To: Adam Laputz, Assistant Executive Office
Central Valley Regional Water Quality Control Board
Rancho Cordova, CA 95670Subject: Proposed Revision to Waste Discharge Requirements R5-2014-0030
for Growers within the Sacramento River Watershed

The Upper Feather River Watershed Group is one of thirteen Subcoalitions within the Sacramento Valley Water Quality Coalition which serves as the third party for this WDR Order. We have reviewed available Delta RMP information, the current WDR and the proposed Revision to study the potential for increased monitoring, reporting and other program burdens for the third-party and its subcoalitions.

We ask the Regional Board to consider the diversity of the thirteen subcoalitions under WDR R5-2014-0030. Three subcoalitions with existing monitoring sites in the Delta region may have an opportunity to reduce redundant monitoring efforts and may elect to participate as outlined in the WDR Order and Revision. However, the agricultural membership of the UFRWG located upstream of the Oroville Reservoir (and perhaps other upper elevation subcoalitions) have no opportunity to either improve or degrade the water quality of Delta Region given the following: 1) the lack of direct hydrological connection between our subwatershed regions and the Delta region; 2) the low intensity pasture and forage practices in our mountain watersheds; and 3) the excellent ILRP assessment monitoring results of the past nine years.

UFRWG meets identified criteria and will submit an application for the Reduced Monitoring Management Practice Verification option of this WDR. Participation in local regional programs such as the Upper Feather River Integrated Regional Watershed Management Program (IRWMP) is a wiser use of member resources as local agriculture continues to participate in working together with other Upper Feather River Watershed stakeholders.

The new elevated WDR program components, with expanded assessment reports and escalating costs, combined with increased coalition and individual reporting burdens, continues to eliminate local funds for local implementation projects by our Upper Feather River members. The ILRP water quality data does not seem to support increased mandates. Consequently, we have reached out to our local policy makers with our concerns about the proposed expansion of this WDR to help identify sustainable program options; as we also request of the coalition and the Regional Board.

Thank you for careful consideration of these points of concern on behalf of the leadership and membership of the Upper Feather River Watershed Group.

Sincerely,

Russell Reid, Chairman

Upper Feather River Watershed Group

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