

SHASTA COUNTY CATTLEMEN'S ASSOCIATION

P.O. Box 492401
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October 28, 2011

To: rsatkowski@waterboards.ca.gov

Re: Comment Letter-Water Measurement

From: Steve Moller, President, Shasta County Cattleman's Assoc.

Thank you for the opportunity to comment on the "Guidance for complying with water diversion measurement requirements for statement holders" Our comments are as follows:

1. We are extremely disappointed that hearings on this very important subject affecting diverters and irrigated agriculture across the state was only held in Sacramento. Many diverters did not have the luxury of traveling to a hearing in Sacramento. This meeting was crowded way beyond the Boards expectations and many who had traveled to the meeting were unable to offer their comments. A subject of this magnitude and economic impact should have hearings up and down the state.
2. We strongly support the use of "**Measuring Methods.**" It is not economically feasible for water rights holders of small diversions to be required to comply with the "Measuring Device" requirement. The Board should take and consider testimony from diverters as to where the break off point is that makes "**Measuring Devices**" and the costs of installation impracticable. Large diverters are more able to amortize the costs of upgrading systems and installing "**Measuring Devices**" than small diverters.
3. In determining "not locally cost effective" the Board should consider the financial and practical impact of California Department of Fish and Game streambed alternation permit if changes must be made to diversions to trigger this permit requirement. These costs in many cases will make the diversion impracticable.
4. Diversions on anadromous fish streams that are changed or altered will require permitting through county, state, and federal agencies. These permits may not be forthcoming in a timely manner, if they are approved at all by all permitting agencies.
5. This program will have a tremendous impact on irrigated agriculture in California and is not well thought out. It seems as though these requirements were rushed through the legislative and legal process with a minimum meaningful public input. Much family owned farms and ranches will be negatively impacted by this requirement.

We respectfully request the Board slow down and carefully consider what kind of measurement requirement is really necessary. We also request that the Board hold additional hearings on this important topic at locations that are convenient to those who will be impacted by these onerous regulations. In an era of reduced budgets and struggling rural economies, it is important that you consider input from the diverters if you truly want to have any kind of partnership with water rights holders.