

SIERRA COUNTY

Board of Supervisors
P.O. Drawer D
Downieville, California 95936
Telephone (530) 289-3295
Fax (530) 289-2830



May 8, 2015

To: Adam Laputz
Assistant Executive Officer
Central Valley Regional Water Quality Control Board

Re: Proposed Revision to the Waste Discharge Requirements for Growers within the
Sacramento River Watershed (R5-2014-0030)

Dear Mr. Laputz,

This letter presents Sierra County Board of Supervisors' comments regarding the above referenced revision to WDR Order R5-2014-0030 which regulates agricultural irrigators in our county and the upper Feather River watershed region. The opportunity to review the revision and research existing information on the emerging Delta Regional Monitoring Program has been relatively short and we thank you for your consideration of our comments.

While it appears the initial language of the revision presents involvement in a regional program as an election, the experience of our agriculture community has been one of expanding assessments, reporting obligations and associated costs as Subcoalition members under the WDR Order for the Sacramento River Watershed. Any Delta Regional Program participation by the Sacramento Valley Water Quality Coalition has potential to obligate all of its Subcoalitions to increased monitoring, reporting and fee obligations for such programs. Broad regional programs compound the inequitable conditions that occur when a one-size-fits-all solution is crafted. The Central Valley Salinity Alternatives for Long-Term Sustainability (CV-SALTS) is an example of a regional program commitment by the large Sacramento Valley Coalition with minimal to no cost-benefit for many of the higher elevation Subcoalitions within the large Coalition structure.

We encourage the Regional Board to consider the diversity of the thirteen Subcoalition watersheds within the Sacramento Valley Water Quality Coalition. Many of the groups, similar to our small agriculture community, have no opportunity to impact the Delta region with their low-threat mountain pasture and forage operations in the upper Feather River watershed nearly a hundred miles above the Oroville Dam.

Sierra County recognizes the value of regional efforts to address water resource concerns. Locally, the Upper Feather River Integrated Regional Water Management Plan is currently being reviewed through a stakeholder workgroup process to create an updated coordinated regional strategy for water resource management in our area. We agree these types of regional approaches create an opportunity for local stakeholders, including agriculture, to participate in local water resource planning and project implementation. We anticipate successful local project identification and implementation in our mountain headwaters region above the Oroville Dam.

Low margin mountain pasture & hay ranches are in need of relief from supporting the many broad regional monitoring programs, consultant fees, litigation coffers, public relations budgets and other fees associated with the Central Valley coalitions. Sierra County and its citizens appreciate these highly productive

regions which supply large percentages of the nation's food supply. However, regional water quality concerns vary significantly as do the commodities and related agricultural practices of the different regions. On behalf of the low density ranchers and hay growers in our headwaters region, and supported by nine years of ILRP water quality data from 2006 through 2014, the time is overdue for the Central Valley Regional Water Quality Control Board to fully recognize regional diversity and to modify programs and program fees accordingly.

The Upper Feather River Watershed Group (UFRWG) is an excellent case study to either exempt the upper subwatersheds, or at minimum, give these low risk subwatersheds a special status to recognize the successful efforts and high quality discharges of the local agricultural practices. From a regulatory standpoint, data supports a move forward to develop a mechanism to more effectively recognize the declining cost-benefit of broad regional monitoring and program mandates which do not recognize the uniqueness of the upper regions and the commitment of local agriculture communities to date.

The Delta Regional Monitoring Program appears to be in early development stages with the primary stated goal of the Delta RMP Steering Committee to identifying funding sources for the expanded monitoring program. Upper Feather River agriculture comprises merely 3.5% of land-use yet has borne a substantial burden to monitor local creeks and streams in our region and fund reports for the Irrigated Lands Program. To expand that burden under the proposed WDR Revision with a potential obligation to contribute to a broader monitoring program for the Delta region is unreasonable.

The continual fiscal strain on our local agriculture community is a strain on the entire County economy. Perhaps the following demographics can provide a clearer perspective of the heavy economic drain the Irrigated Lands Regulatory Program has been on Sierra County with a mere population of 3,000 and 3.4 citizens per square mile; a population decline of 7.3% for 2010 to 2014; and an average family income of \$39,000 compared to the statewide average of \$61,094. Plumas County demographics are similar with a 7% population decline to 19,399. The ILRP has collected an average of \$50,000 per year, for the past nine years, from the 90 or so UFRWG subwatershed members (both Sierra and Plumas Counties) to conduct stream monitoring and meet the costly reporting requirements through the large Sacramento Valley Coalition. This sum of \$450,000 represents funds not available locally in the two counties to address the real needs of our disadvantaged communities. State Watermaster fees for upper Feather River irrigators have increased 543% and 261% for the two service areas. The ongoing extreme drought conditions and consequential reduction in forage production are impacting available farm resources as well. Altogether, this tsunami of various program fee increases, coupled with historic low levels of snowpack and precipitation, has placed a substantial burden on efforts to sustain agriculture as an important part of our economy and rural landscape.

The UFRWG leadership advises the Sierra County Supervisors that the additional reporting burdens of the new WDR Order has required an increase in local dues and fees to meet the expansion of professional consultants and providers for Farm Evaluation database development and long term management, Groundwater Assessment reports and plans, Sediment and Erosion Assessment reports and plans, Nitrogen Management Practice reports and effectiveness planning, and other reporting expansions. This virtually eliminates funds available for local on-the-ground water quality implementation projects by family farms and ranches; local projects which would promote the water resource goals of our Upper Feather River IRWM as well as the water quality goals of the Central Valley Water Quality Control Board. Common sense calls for steps to be taken to work more closely together to rethink the current Central Valley reporting strategy and amend it with a more locally productive implementation strategy.

In the absence of timely Delta monitoring program and WDR revision details shared by the large Coalition with UFRWG and other Subcoalitions under its jurisdiction, it is difficult to ascertain the potential future obligation to the thirteen Subcoalitions regulated under the Sacramento River Watershed Waste Discharge Requirement Order.

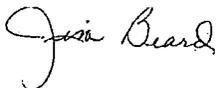
Therefore, we respectfully request a rescheduling of this June 4-5 Central Valley Water Board agenda item and an extension of the comment period to allow further investigation into the short term and long term consequences to our upper Feather River region and to research any EIR concerns. A reasonable postponement will provide all stakeholders with more adequate time to collect information for submitting informed comments.

Additionally, we request a review of the large Coalition structure to ensure all program information, such as this revision, is timely distributed and the decision making process includes Subcoalition representatives who in turn seek input from their subwatershed stakeholders ultimately impacted by Coalition decisions. Noting also, that a variable cost-share schedule is essential to reflect the variable cost-benefit of regional programs for the diverse thirteen Subcoalitions.

Finally, we encourage the continued development and approval of modified programs to better reflect the actual water quality successes of various agricultural commodities and subwatershed regions. The Reduced Monitoring/Management Practice Verification program is one option for which the UFRWG meets the listed criteria and will be submitting an application. We support timely approval of their application and suggest the development of corresponding program fee modifications makes equal sense as well.

Sierra County Board of Supervisors thanks the Chairman and Board Members of the Central Valley Water Quality Control Board for close consideration of the observations and recommendations presented in this comment letter. These proposals can ensure the State's water quality goals continue to be addressed while allowing for wiser local use of limited funds and resources.

Sincerely,



Jim Beard, Chairman
Sierra County Board of Supervisors

cc: CVRWQCB Board Members: Karl Longley, Denise Kadara, Jon Costantino, Carmen Ramirez,
and Robert Schneider