

**COUNTY OF NEVADA**  
STATE OF CALIFORNIA  
**BOARD OF SUPERVISORS**



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**Chair Richard Anderson**, 5<sup>th</sup> District  
**Julie Patterson Hunter**, Clerk of the Board

October 8, 2019

Attn: Karl E. Chair Longley  
Central Valley Regional Water Control Board  
11020 Sun Center Drive, #200  
Rancho Cordova, CA 95670-6114  
[kfranfranchi@waterboards.ca.gov](mailto:kfranfranchi@waterboards.ca.gov) (email)

Chair Longley and Regional Board Members,

On behalf of the Nevada County Board of Supervisors, I am submitting this Letter of Support requesting that applicable Nevada County agricultural growers be considered low threat/low vulnerability for agriculture discharges and express our support for new waste discharge requirements for low threat geographical areas and crop types to reduce administrative and financial burdens on our community. As you are well aware, the Central Valley Regional Water Quality Control Board (CVWB) is the largest and most diverse region that covers approximately 75% of the State's irrigated agricultural lands and provides more than 50% of the State's total water supply. Being the most diverse region in the state, it is important that the necessity to properly regulate agricultural water discharge via CVWB's Irrigated Lands Regulatory Program (ILRP) is properly balanced between low threat and higher threat geographical areas and crop types. Growers in the foothills and upper elevation areas in Nevada County are subject to unique farming limitations, limited seasons, predominance of minimal to no pesticide use, fertilize use or annual tillage, yet remain subject to the same complex regulatory requirements that translate into high costs, and laborsome reporting that have the unintended consequence of negatively impacting our farmers.

The Placer-Nevada-South Sutter-North Sacramento Subwatershed Group within the Sacramento Valley Water Quality Coalition is recommending that the CVWB consider criteria for low threat geographical areas and crops that include foothills and higher elevation areas, irrigated pasture and managed wetlands, organic agriculture crops, and Christmas tree and other long-term crops. Other recommendations include exempting low threat crops from various regulatory fees and reporting and conducting an economic analysis on ILRP regional activities and impacts in rural areas like Nevada County. We encourage the Board to consider these types of criteria and concerns as it moves forward in its consideration in exempting low risk type areas and crop that ensure the preservation and enhancement of the quality of California's water resources and drinking water.

Sincerely,

Richard Anderson  
Chair, Board of Supervisors

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