



**SIERRA VALLEY RESOURCE
CONSERVATION DISTRICT**
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March 12, 2021

RE: Lacey Meadows 401 Permit and CEQA Documents

Lahonton Regional Water Quality Control Board
Attn: Tom Gavigan (tom.gavigan@waterboards.ca.gov)
Douglas Cushman (douglas.cushman@Waterboards.ca.gov)

To Whom It May Concern:

This letter is regarding the concerns of the Sierra Valley Resource Conservation District (RCD) on the recently proposed Lacey Meadows Restoration Project. The mission of the Sierra Valley RCD is to assist Sierra Valley private and public landowners with protecting property, economic viability, and agricultural values; by managing resources, particularly water quality and quantity. Our primary concerns with the Lacey Meadows Restoration Project, as discussed at our special Board Meeting on March 10, 2021, includes **Infringements on Water Right holders in Sierra Valley.**

The Sierra Valley Water Company serves farmer and ranchers within the boundaries of the Sierra Valley RCD. The Sierra Valley Water Company is entitled to deliver water March 15-September 30, diverted from the Little Truckee River. This water originates in the Truckee River Watershed, including Lacey Meadows, and is essential to the economic prosperity of Sierra Valley for agricultural irrigation and livestock production as outlined in the 1939 Decree. The utilization of log jams and ponds proposed in the restoration project can impeded water flows and negatively impact the water rights of Sierra Valley landowners and water right holders. Furthermore, the RCD Board members had consensus that the described project practices were equivalent to irrigation practices, to divert water across lands to provide for vegetative growth and would thus require a water right.

At the Sierra Valley RCD Meeting on March 10, 2021 we spoke with Beth Christman, Truckee River Watershed Council, regarding our concerns for the proposal. During this time, there was mutual agreement to build in measures that would provide protections and assurances for Sierra Valley Water Right Holders including:

1. Performance measures to the project, that if water flows into Webber Lake were reduced due to the installation of pond and log jams impeding water flows, then Truckee River Watershed Council will restore/adapt Lacey Meadow to preexisting conditions to restore flows to support preexisting water rights.
2. Continue long term 3rd party flow data that will be provided to Sierra County and Sierra Valley RCD to demonstrate pre and post flow in the system.

Thus, we propose the **conditions of 401 permit and CEQA approval include the aforementioned terms that protect the economic property and legal water rights of Sierra Valley Water Company landowners.** Without written assurances, landowner water rights, agricultural production, county revenue and property values are jeopardized by the proposed project.

Additionally, we are concerned that the Lahontan Regional Water Quality Board, as the CEQA lead, did not notify or consult with Department of Water Resources (Watermaster for Sierra Valley and owner of Webber Lake) or Sierra Valley Water Company. Furthering our concerns, the Sierra Valley RCD was not notified or consulted with by the Lahontan Regional Water Quality Board on this project until the March 4, letter.

Sincerely,


CHAIR RICK ROBERTI

Cc:

Beth Christman, Truckee River Watershed Council
Tim Beals, Sierra County
Eric Roen, Sierra Valley Water Company
Luis Sepulveda, CA Department of Water Resources
Paul Roen, Sierra County Board of Supervisors, District 3
Brian Casci, Federal Watermaster