

PNSSNS Frequently Asked Questions (FAQ)

What is the Subwatershed Group?

A group of agricultural interests formed to represent all "dischargers" who own or operate irrigated large and small farms or rural acreages.

Who should belong to the Subwatershed Group? Do you conduct an agricultural related business from your property? Yes or No Do you file the 1040F form (claiming ranch or farming deductions) on federal tax returns? Yes or No

If you answered NO to both questions, then you are NOT required to belong to this program.

If you answered YES to either question, then you ARE required to belong to this program. You must call the Central Valley Regional Water Quality Control Board (Regional Water Board) at 916-464-4611 and leave a message that you want to join the PNSSNS Subwatershed Group.

Under the umbrella of the Sacramento Valley Water Quality Coalition (SVWQC), in 2003 the PNSSNS Subwatershed Group was formed as a non-profit 501C3 organization and the acquired Regional Water Board authorization to provide discharge waivers via membership in the Subwatershed Group. There are ten subwatershed groups that represent the Sacramento Valley area.

Are you a discharger?

The California Water Code has been interpreted to presume that, if you irrigated acreage and any irrigation or storm water leaves your property, that water could contain waste constituents which may affect downstream surface water quality. When any surface water leaving your property contains waste such as sediment, pesticides, organic compounds, etc., then you are a "discharger" subject to regulation.

What are the Subwatershed Group's goals?

- To operate an efficient, economical program that enables members to be in compliance with the Irrigated Lands Waiver.
- File required reports with the Central Valley Water Quality Control Board (Regional Board) to provide conditional waiver coverage for members of the Subwatershed Group.
- Develop and implement an economical and scientifically valid water monitoring program for area rivers and agricultural drains (as required by the waiver).
- Spread costs equitably among land owners/operators who are Subwatershed Group members.
- Communicate to landowners where water monitoring results indicate problems and work to solve those problems.

How do land owners/operators join the Subwatershed Group? New members must first obtain Regional Water Board approval to join the Subwatershed Group. Two forms (ILP-5.1 and ILP-5.0) must be filled out and submitted to the Regional Water Board. Go to www.waterboards.ca.gov to download forms or email pnssnssubwatershed@gmail.com

- After you receive Regional Water Board approval, they will send their approved list of applicants to PNSSNS.
- PNSSNS will contact you with new membership sign-up forms and information.

What will the membership dues be spent on?

- Water sampling and analysis
- Preparation of Regional Board reports
- Membership database management
- New member and membership renewal materials
- Outreach meetings for landowners to help implement best management practices to improve water quality.

What if you don't join the Subwatershed Group?

You must file a Notice of Intent with the Water Board to participate in the conditional waiver as an individual or apply for a waste water discharge permit. The cost for filing as an individual discharger can be considerable. The California Farm Bureau Federation estimates start up costs and monitoring for an individual waiver at \$10,000 for the first year and \$3,000 to \$6,000 annually thereafter for monitoring and reporting.

Who is responsible for making the Subwatershed successful?

The individual members of the Subwatershed Group. Failure of the group to meet deadlines, develop the proper monitoring programs or work to correct water quality problems would mean that individual landowners would be responsible for fulfilling those requirements. While the Board of Directors signed the notice of intent for the Subwatershed, it is the Group's participants who are ultimately responsible for participating in Subwatershed activities and paying their fair share of all costs to carry out the conditional waiver program.

What other commitments are involved in joining the Subwatershed Group?

Land owner participants must agree to allow Regional Board staff, upon reasonable notification, access onto their property to determine compliance with the conditions of the waiver. Individuals are free to withdraw from the Subwatershed Group at any time and obtain an individual waiver from the Regional Board.

Subwatershed Cooperating Entities

Cooperating entities are those local groups and organizations who are committed to assisting the Subwatershed Group in reaching its goals. To date, the following entities have signed Memorandums of Understanding:

- Coalition for Urban/Rural Environmental Stewardship (CURES)
- Ducks Unlimited
- Placer County Resource Conservation District
- Placer County Ag Commissioner
- Sutter County Ag Commissioner
- Sacramento Ag Commissioner
- Nevada County Ag Commissioner

Who's managing the Subwatershed? A Board of Directors has been established to manage the Subwatershed Group. The Board of Directors are:

- President – Tom Aguilar Placer County, mandarin grower
- Vice President – Ed Sills Sutter County, diversified organic farmer
- Treasurer – Bonnie Ferreira Placer County, cattle and diversified farmer
- Secretary – Jim Gates Nevada County, cattle rancher
- Representative – Frank Correia Placer County, cattle rancher
- Representative – Alan Lauppe Sacramento County, diversified farmer
- Representative – Matt Conant Sutter County, walnut farmer
- Founder and former President – Kirk Scilacci

Who appointed you God? How did you get to be on the Board of Directors? Kirk and current Director Bonnie Ferreira began attending Regional Water Board meetings in 2003. They became concerned that an "agriculture unfriendly" group could run this program. In such case, the cost to farmers could be as prohibitive as getting an individual discharge waiver from the Regional Water Board. Kirk and Bonnie convinced Tom Aguilar, Mike Daddow, Alan Lauppe, and Frank Correia to serve on the Board of Directors and ante-up start up costs to form a 501C3 non-profit organization authorized by the Regional Water Board to issue discharge waivers.

Kirk adhered to the KISS (Keep It Simple Stupid) motto. Too many board members would slow down the process and it would cost too much money to send ballots to vote in new board members, thus the board has remained closed for three years. However, now that the organization is up and running, the board changed the bylaws to reflect a fair turnover policy that will continue the representation of both large and small farmers from each county. If you are interested in serving on the Board, please call 916-645-1774 or email pnsnsssubwatershed@gmail.com

Does this program really concern me with only 2 acres of organic kiwi? Yes. Certainly a lone organic farmer is considered a very low threat to our waters. However, multiplied by the hundreds of small farmers and rural property owners “doing their own thing” the possibility of negative impact on our waters becomes greater. The water is tested for both chemical and organic compounds including water temperature, turbidity, dissolved oxygen, dissolved solids and organic carbon. A discharge waiver is required for anyone who uses irrigation water, surface water, or well water and/or has storm season runoff. Why are “they” picking on agriculture? Agriculture has been exempt (with the exception of rice farmers) from monitoring its discharged waters. Every other industry and municipality has been required to test its waters and clean it up when problems arise. The Environmental Protection Agency (EPA) mandated that all states must maintain clean waters. About five years ago, California’s Regional Water Board started requiring discharge waivers to make agriculture accountable for pollutants being discharged into the water. Agriculture is just the last industry to begin monitoring its waters.

I have neighbors who cleaned out their horse arena piling the manure and sawdust outside. The runoff may potentially pollute a nearby stream. What do I do?

Call the Regional Water Board at 916-464-4611. The PNSSNS Subwatershed group is not a government agency. We are a nonprofit org. serving people that irrigate by providing them a group discharge permit.

In July, I was called regarding my opinion of Coon Creek upstream of the Brewer and DLX test sites. I replied that normally the creek is very low through the summer and is yucky, dirty water. I was asked if I saw any fish in the water. I replied that I did see some carp. What was this all about? In June and July, PNSSNS received an exceedance report indicating a low pH of 4.08 at the DLX test site in Coon Creek. Normal healthy pH range is 6.5-8.6. Most fish cannot live in low pH water. Nevada Irrigation District (NID) sampled on June 15th, a pH of 7.19, which is a normal average pH, at Deadman’s Ravine further upstream. PNSSNS coordinated a separate pH test at the DLX location which indicated a 6.8 pH. Finally, it was determined during sampling that the Larry Walker Associates’ pH meter used to measure those exceedances was malfunctioning, in spite of consistently meeting all calibration requirements. As a result, the water testers were able to get the Regional Water Board to agree that all the pH results collected with that meter in June and July would be rejected. This means that pH exceedances reported for Coon Creek in June/July are deleted from the record and require no additional follow-up and will not count towards new Management Plan requirements.