



June 9, 2016

Mr. Lance Salisbury, Senior Environmental Scientist
California Department of Fish & Wildlife
Lake and Streambed Alteration Program
1416 9th St., 12th Floor
Sacramento, CA 95814

RE: Proposed Rulemaking on Fees for Lake and Streambed Alteration Agreements

Dear Mr. Salisbury:

The Rural County Representatives of California (RCRC) is an association of thirty-five rural California counties, and the California State Association of Counties (CSAC) represents all fifty-eight California Counties. Our member counties are tasked with a variety of decision-making responsibilities related to land use and development in California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. RCRC and CSAC welcome this opportunity to provide comment on the proposed rulemaking on fees for Lake and Streambed Alteration (LSA) Agreements.

Counties are required to participate in the Lake and Streambed Alteration Program for a number of county projects including road and bridge construction and maintenance, vegetation removal and remediation, watershed restoration, and a variety of other projects. While we appreciate the Department's need to meet budgetary goals, the proposed 129 percent increase in LSA Agreement fees is excessive, particularly since the fiscal analysis released with the rulemaking indicates that most of the increases in the Department's expenses are due to staffing, salary, and benefits increases. The proposed increase is significant, particularly for many counties that have among the highest unemployment rates and lowest countywide median household incomes in the State. Many counties aren't in a position to raise their own fees in order to cover such a costly fee increase, particularly when the Department is now also proposing to implement an unreasonably high fee structure for California Endangered Species Act permits as part of the 2016-17 State Budget process. RCRC and CSAC recommend that the Department extend the public process on the rulemaking and work with impacted stakeholders to explore other options to make the LSA Agreement process more efficient for Department staff, rather than unilaterally imposing such a drastic fee increase.

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While our organizations do not support the proposed increase, we do support including marijuana cultivation sites in need of remediation in the LSA Program. Many of our member counties that are prime cultivation areas for cannabis growers have seen years of damage to fish and wildlife from renegade growing activities. RCRC and CSAC fully support inclusion of these sites in the program to help pay the costs of remediating the damage done through these operations.

If you should have any questions or would like to discuss our comments further, please contact Staci Heaton of RCRC at (916) 447-4806 or Karen Keene of CSAC at (916) 650-8181.

Sincerely,



STACI HEATON
Regulatory Affairs Advocate
RCRC



Karen A. Keene
Senior Legislative Representative
CSAC

cc: Charlton Bonham, Director, California Department of Fish and Wildlife