

Rural County Representatives of California

2013-14 Policy Principles

Board Adopted March 26, 2014

AGRICULTURE

Agriculture is a major industry for California second only to tourism. With 88,000 farms and ranches, California agriculture is a \$37 billion industry that generates \$100 billion in related economic activity. California agriculture is a highly adaptable and diverse industry encompassing more than 350 plant and animal commodities that feed the state, the nation, and the world.

Agriculture also plays a number of other vital and diverse roles in the California landscape. California agriculture provides for much needed open space in an ever increasing urban California, national security through the raising of our own fruits and vegetables, meat, poultry and other agricultural products, residual products for biomass to create a clean alternative energy source, science based research and development through major universities, agri-tourism, preservation of habitat, and the reduction of green house gases.

Much of the state's agriculture is rooted in California's rural counties and it is imperative that policies affecting the industry such as water, land use, taxation, and numerous others create an environment that will allow our farmers and ranchers to continue to provide the safest and most nutritious products that feed not only our state but the world, as well as the additional critical benefits of California agriculture.

AGRICULTURAL LAND MITIGATION

Agricultural Land Conversion to Habitat. RCRC believes that mitigation should be required for the conversion of agricultural lands to terrestrial or aquatic habitat when the easement is permanent and/or agricultural land uses are prohibited. This mitigation should be required for a period of time that is commensurate with the amount of time that the agricultural land uses will be precluded. An exception to this policy is agricultural development where land is set aside for habitat or open space to address the impacts of the agricultural development.

Easements. RCRC believes that the "stacking" of habitat and agricultural conservation easements may or may not be appropriate depending on the specific county and circumstances.

Feasible Mitigation. RCRC believes that permanent agricultural land conservation through easements and fees should be recognized as feasible mitigation for the loss of agricultural land as determined by the local government. RCRC supports clarifying in statute that the permanent protection of agricultural land is feasible mitigation under CEQA for the loss of agricultural land.

Local Land Use Authority. RCRC opposes efforts to preempt local land use authority in connection with the conversion of agricultural land to nonagricultural uses. A one-size fits all approach with respect to mandatory mitigation requirements, arbitrary minimum or maximum mitigation ratios, the types of agricultural land required to be mitigated, and the location of mitigation lands ignores the unique characteristics of each county, has no scientific basis, and would establish a bad precedent.

Mitigation Lands. RCRC believes that mitigation lands should be of comparable quality and value to that permanently converted.

BIOTECHNOLOGY

Agricultural biotechnology is a collection of scientific techniques that are used to create, improve, or modify plants, animals, and microorganisms. Agricultural crops developed utilizing biotechnologies are often referred to as genetically engineered, genetically modified, or bioengineered. The U.S. is the largest producer of genetically modified crops, one of the largest producers of organic crops, and one of the largest exporters of conventionally-grown, identity preserved crops in the world. Coexistence among the three categories of crops is a distinguishing characteristic of U.S. agriculture, and makes it different from some other parts of the world.

Adventitious Presence. Adventitious presence (AP) is the unintentional, low level presence of transgenic material in seed, grain, or food. Until such time as the U.S. Department of Agriculture (USDA) adopts a comprehensive policy, RCRC supports the practice of local, regional, and state-level stakeholders developing rules, practices, standards (e.g., planning of flowering and harvesting of different crops, grower districts, crop improvements and seed certification associations, seed sourcing standards, and noxious weed standards) that enable coexistence of specialized or sensitive agricultural products and meet diverse consumer and marketplace demands.

Education. RCRC supports efforts by the food industry to educate consumers about biotechnology, as consumer perception and market acceptance will determine the viability of the technology and the products produced.

Federal Regulation. RCRC supports the rigorous, science-based federal regulation of biotech products. This includes the Food and Drug Administration's broad authority to regulate all foods that are derived from new biotechnology food crops, regulations that require a scientific basis for approval/disapproval of agricultural products both domestic and foreign, the Department of Agriculture's regulation of the movement, importation and field testing of genetically-modified crops, and the Environmental Protection Agency's establishment of limits for the amount of pest-control proteins present in foods derived from new genetically-modified crops.

Labeling. RCRC supports allowing, as a marketing tool, the voluntary labeling of products as not produced utilizing biotechnology if the label statements and/or

advertising are not false or misleading, and the labeling and/or advertising meets established federal guidelines or standards, if any.

Research. RCRC supports policies including state funding for our universities that provide research and development of biotechnology techniques in agriculture to improve the productivity and competitiveness of California's agricultural and allied industries.

State Policy. RCRC supports a consistent statewide policy for the use of biotechnology in agriculture.

INSPECTION AND COMPLIANCE

Today's farmers, both large and small, are facing many challenges including pressure from development, scarce resources such as water, a more stringent regulatory environment, and increasing imports of fruits and vegetables with minimal oversight. Agriculture is California's leading industry and the primary economic base for many of the communities of rural California. RCRC is supportive of programs and regulations that assist in preserving: rural lands for agriculture, adequate supplies of resources at reasonable cost, and regulatory enforcement at the local, state, and federal level to help assure a fair and equitable market for our agricultural products.

Inspection and Compliance. RCRC supports funding for the operation of all state and national border inspection stations and monitoring of pesticides and pests in order to assure a safe, fair, and equitable marketplace for California's agricultural industry.

Right to Farm. RCRC supports responsible local right-to-farm ordinances designed to permit and protect the rights of agricultural producers to engage in necessary activities without undue or unreasonable restrictions.

CLIMATE CHANGE

In 2006, California established official state policy on climate change via the California Global Warming Solutions Act of 2006, also known as AB 32. In 2008, California began working on the California Climate Adaptation Strategy (CAS), which addresses the possible effects of climate change and California's strategies to diminish the effects on California's population. While there are scientific uncertainties with respect to the causes and effects of climate change, RCRC recognizes the need to respond to California's climate change policy, while also encouraging reduction of greenhouse gases (GHG) and mitigation of possible climate change effects where cost-effective and technically feasible.

State and Local Agency Coordination. Recognizing that reducing GHG emissions and climate adaptation will require the efforts of multiple state agencies,

RCRC supports a coordinated effort between the various state agencies to avoid duplicative rulemaking processes.

RCRC also supports the formation of stakeholder advisory committees to lend practical expertise to state agency working groups during the development of multi-agency regulations and voluntary programs. Because every community has different needs, involvement of a variety of stakeholders, especially local governments, is vital to ensure that the state avoids a “one size fits all” process when adopting regulations and establishing programs to mitigate the effects of climate change.

RCRC also believes that it is the state’s responsibility to reach out to rural communities to promote and educate during the development and implementation of statewide GHG emissions reductions measures. When individual rural communities are affected, the state should conduct workshops in those communities to provide opportunities for public input and to take comments on the state’s GHG policies.

Land Use Authority. RCRC supports development of technical guidelines by the Office of Planning and Research (OPR) that set specific, quantifiable GHG emissions standards for CEQA and general plan documents.

RCRC believes that the development of state and federal assistance programs to provide data, methods, and financial support to help determine and quantify GHG emissions is vital for local governments to be able to address climate change in CEQA and general plan documents.

RCRC opposes any legal, legislative, or regulatory action which uses climate change policy as a vehicle to restrict or remove local land use authority.

RCRC supports a collaborative process between state and local agencies in the development of all climate change adaptation strategies related to land use decisions. The state should have the responsibility to identify possible strategies for its own agencies’ use and for voluntary use by local or regional agencies.

RCRC opposes the inclusion of climate adaptation in the Regional Blueprint Planning Program. Regional bodies have no authority over land use planning decisions, and the inclusion of climate adaptation will only create additional conflict to the already complicated process created by SB 375.

Green Industry. RCRC recognizes the potential for growth of green industry in California, and supports the creation of incentives for those companies to build new operations in areas with the highest rates of unemployment.

Incentive-Based Programs. RCRC supports the development of state programs which offer incentives to entities that voluntarily reduce greenhouse gas (GHG) emissions and implement climate adaptation programs, including grants, loans, offsets, early action credits, and market-based credits trading programs. RCRC believes the state should recognize and offer special incentives to industry sectors

that have already made significant GHG emissions reductions. RCRC supports free allocation of credits in market-based systems to smaller entities that may not be able to compete with large entities in an auction-based structure.

Public Health. RCRC supports a strong emphasis by the state on the important role of local and state public health departments in possible climate adaptation strategies. The state should provide fiscal and policy support to public health departments to ensure their ability to expand and evolve to meet the potential needs of a changing climate.

Monitoring and Reporting. RCRC supports the development of GHG monitoring and reporting protocols through an open, transparent public process. RCRC opposes mandatory reporting for sectors that have been shown through the state emissions inventory to represent net GHG sinks.

Regulatory Compliance. Anticipating that the costs for GHG regulatory compliance will be disproportionately high in rural areas of the state, RCRC encourages flexibility for economically disadvantaged and rural areas in state regulatory programs, including exemptions and tiered compliance schedules based on appropriate, regulation-specific parameters. RCRC believes that a state financial assistance program is imperative to enable local agencies to comply with GHG regulations.

GHG Capture and Sequestration. RCRC supports scientific study of the benefits of carbon sequestration and methane gas capture projects. RCRC supports the development of broad, scientifically-based methods of accounting carbon storage in sequestration projects, including agriculture and forestry projects, and methods of accounting methane gas capture at landfills. RCRC supports programs that offer early action credits and offsets for GHG capture and sequestration projects.

Wildfire Emissions. RCRC strongly supports the development of a comprehensive and cooperative federal and state program to investigate and measure GHG emissions from wildfires as a crucial component in the state's overall climate change strategy. RCRC supports immediate fuels management and fire prevention as a vital component of the state's climate adaptation strategy. Coordination between federal, state, and local agencies is critical to the mitigation of wildfires.

Tribal Gaming Compacts. Recognizing the potential expansion of tribal gaming facilities and anticipating the renewal of current gaming compacts, RCRC encourages the inclusion of greenhouse gas mitigation strategies in all new and renegotiated tribal gaming compacts.

Cap-and-Trade. Recognizing that the cap-and-trade program is proposed to collect millions of dollars in revenue from utilities during the auction process, RCRC supports an equitable distribution of those funds back to ratepayers.

RCRC also supports using funds from cap-and-trade auctions for projects that will both reduce GHG emissions and benefit economically challenged communities. In particular, RCRC supports using the proceeds to fund fuels reduction, forest restoration and biofuels utilization projects, as well as utilizing these funds for state subvention funding to counties for the Williamson Act.

COUNTY OPERATIONS

Although RCRC member counties contain over 48% percent of California's land mass, less than eight and a half percent of California's population resides in these counties. Geography and distance present unique challenges for rural counties providing services. Consequently, requirements imposed by the state on county operations can have a significant or disproportionate impact on rural counties.

CALIFORNIA BUILDING STANDARDS CODES

The California Building Standards Code (CBSC), California Code of Regulations, Title 24, consists of twelve parts. By statute, the CBSC is based upon the newest national model codes published by various independent code-developing bodies and organizations. The CBSC is subject to an administrative rulemaking process administered by the Commission. Every three years, the California Building Standards Commission (Commission) reviews the most recent national model codes during their triennial update cycle of the CBSC. Once adopted by the state, these building standards become the minimum standards for the state. Local jurisdictions have the authority to adopt stricter or alternative standards with the same effect.

New Building Code Standards. With California's diverse geographic and topographical conditions, climate and weather, conditions of general development, and other environmental and economical factors, RCRC supports more flexible local variations to code requirements and their implementation. RCRC supports tailoring regulations and requirements for rural counties to local conditions.

Increased Building Costs. Building costs can be disproportionately higher in rural counties due to geography, low population density, and lack of resources. Bearing the cost of new regulations can be especially burdensome for rural counties. RCRC supports the ability of a local jurisdiction to delay implementation of costly new code requirements in rural areas to allow the availability of the requisite infrastructure to become cost effective and readily available.

ELECTIONS

Election Costs. RCRC supports timely reimbursement of county costs associated with complying with the voting rights provisions of the Help American Vote Act (HAVA). RCRC also supports state reimbursement to counties for special elections called by the Governor.

Electronic Voting Machines. RCRC supports expeditious certification of electronic voting machines by the Secretary of State so that counties will be in compliance with federal and state law. The federal Help Americans Vote Act (HAVA) requires that counties utilize voting machines that allow individuals with disabilities to vote unassisted.

Vote by Mail. Many rural areas of the state have low voter turnout due to physical impediments to voting, including long distances and inclement weather to polling places. Additionally, updating voting machine technology has been costly for many counties, especially as federal and state standards continue to change. Two of California's rural counties (Alpine and Sierra) currently enjoy the ability to conduct all of their elections by mail. RCRC supports expanding the criteria by which counties can conduct all of their elections via all-mail balloting so additional low-population counties have this option. RCRC also supports giving the option to every Board of Supervisors to conduct special elections by mail in order for citizens in rural areas to have more ability to participate and counties to have less administrative costs for conducting special elections.

EMPLOYEES

County Workforce Responsibilities. RCRC opposes legislative proposals that supersede and interfere with the constitutional duties of county supervisors to provide for various terms of employment for their county workforce.

Binding Arbitration. RCRC opposes binding arbitration for public employee wage and benefit disputes where no appeals of an arbitrator's final decision is allowed.

Compensation Disclosure. In response to the 2010 scandals involving a number of municipalities, state officials and many local government bodies have been reviewing the practices of compensating local government officials and senior staff. In October 2010, the State Controller launched a website listing compensation information for all California city and county job classifications. RCRC believes that any disclosure process should be transparent and easy-to-understand for the public. RCRC believes that if the state is to impose additional compensation disclosure requirements, the requirements should be uniform and there should be one single agency for reporting in order to avoid duplication and inconsistencies.

Medical Marijuana in the Workplace. The federal Drug Free Workplace Act of 1998 requires federal grantees and contractors to certify that they maintain a drug-free workplace and inform employees that it is unlawful to use and/or possess a controlled substance (including marijuana as cited in the federal Controlled Substances Act) in the workplace. Failure to adhere to the federal Drug Free Workplace Act could lead to a loss of a variety and extensive amount of federal monies. Absent any change in either the Drug Free Workplace Act or the Controlled Substances Act, RCRC opposes state efforts that would make it unlawful to hire, fire, and/or base a promotion or demotion on a person's status as a user, qualified or otherwise, of medical marijuana. RCRC believes such state efforts

compromise a county's position as employers and would lead to extensive litigation by employees that are using marijuana within the confines of state law.

Outsourcing. RCRC opposes limitations on county governments' ability to contract out municipal services to the private sector.

Public Employees Retirement. RCRC supports efforts to reform the CalPERS system that would help protect the long-term solvency of CalPERS and local entities while maintaining competitive pension benefits for county employees.

Workers Compensation. RCRC supports the preservation of reforms enacted to the workers' compensation system in 2004 and 2012 to further reduce premiums, minimize costs, manage claims, and insure that injured workers are properly compensated and are able to return-to-work in a speedy manner.

MEDICAL MARIJUANA CULTIVATION

Local Preemption. Many RCRC member counties have enacted cultivation ordinances to address issues surrounding medical marijuana grows. While each ordinance varies, most address the size, scale and conditions whereby grows can occur. Enforcement is conducted primarily by code enforcement officers with accompanying law enforcement. The courts have upheld counties' authority to enact these ordinances noting that Proposition 215 and subsequent medical marijuana legislation are not comprehensive and do not preclude local land use authority.

RCRC opposes efforts in the Legislature or the statewide initiative process to weaken or eliminate the ability of counties to set regulatory standards associated with a county's land use authority. Regulatory standards afforded counties must include:

- the ability to regulate, including ban, grows and/or dispensaries;
- the ability to impose stricter local standards than what is afforded in state law/regulation/permit;
- ensure no new "rights" are enshrined in law as the state permits medical marijuana activities;
- preserve local enforcement tools (e.g. nuisance abatement);
- explicit provisions of law, in the absence of comprehensive state standards, which provide the ability of counties to impose pre-retail transportation standards; and,
- the power to tax and/or exact fees associated with local medical marijuana activities.

State Regulatory Program. RCRC supports a state regulatory scheme, consistent with the local control principles outlined above, for medical marijuana provided an empowered state agency requires:

- licenses to grow, transport, distribute and sell medical marijuana products;

- as a condition of issuing a state license, an applicant must demonstrate a local jurisdiction's approval – via a certified copy of documents - to operate within the local jurisdiction's borders;
- maximum standards in the potency of medical marijuana products;
- proper labeling of THC levels and other products used for cultivation;
- allows appellation verification statements to be permitted (“branding”);
- prohibits mobile deliveries and online sales;
- imposes security requirements upon grows and dispensaries;
- restricts all types of licensees for previous criminal convictions (other than minor crimes associated with marijuana) and a strong revocation process for violations of corresponding state medical marijuana laws;
- address the issue of tax compliance and minimize the use of cash transactions;
- authorizes the State to impose taxes and/or fees upon medical marijuana. State should give priority for the use of these funds to localities for the costs of regulation or enforcement;
- state agencies' ability to apply current permit requirements and other regulations relating to water quality and usage, land conversion, pesticide/herbicide usage, and other environmentally-sensitive activities associated with cultivation;
- proper state enforcement of worker and worker safety standards.

State Oversight Board. Any state medical marijuana oversight board must include in its composition several rural county supervisors and/or rural county representatives in order to reflect the unique issues that occur in the cultivation of marijuana in rural areas.

The “Collective Model.” The current legal structure for growing and using medical marijuana involves the collective model whereby individuals band together to cultivate medical marijuana. RCRC believes that this model does not exist in current ‘real world’ medical marijuana practices. A complete restructuring must occur and RCRC encourages the state to craft a multi-tiered model for those who collectively cultivate, transport/distribute, sell and use marijuana.

Environmental Enforcement. Despite the best efforts of counties to utilize their operational and/or land-use authority, counties lack the tools, resources or legal authority to fully address the environmental degradation that is occurring with unregulated grows – the impact on water quality and water supply, destruction of habitat, improper use of pesticides/fertilizers, etc. RCRC believes that environmental impacts must be addressed by a variety of state agencies including, but not limited to the Board of Forestry, the California Department of Fish and Wildlife, Regional Water Quality Control Boards as well as other traditional state law enforcement agencies (i.e. California Highway Patrol, Department of Justice). RCRC supports a requirement that state environmental agencies coordinate with local government to ensure uniform application in enforcement efforts.

Federal Lands. Addressing all of the regulatory, public safety and environmental issues on lands managed by the U.S. Forest Service, the National Park Service, and the Bureau of Land Management presents a set of challenges that exceed those found on state/private lands. Failure to adequately address cultivation on federal lands will marginalize the work on state/private lands. RCRC supports efforts by federal land management agencies to properly manage and eradicate the illegal growing of marijuana on federal lands and encourages federal agencies to actively work with state and local enforcement entities to achieve this objective.

PUBLIC SAFETY

Adequate and Safe Local Detention Facilities. In many counties, courts have imposed mandatory population caps on the number of inmates being housed or serving time in county detention facilities. In addition, many local detention facilities have exceeded their lifespan and are in need of rehabilitation.

RCRC supports efforts that provide a long-term funding mechanism and/or funding sources that would assist in constructing/rehabilitating local detention facilities that preserve and expand the number of spaces available to hold county inmate populations. Many rural counties may have difficulty meeting possible matching requirements for any new funding mechanisms, therefore, RCRC also supports a local waiver be included for certain county financial hardships.

Certified Unified Program Agencies (CUPAs). RCRC continues to support financial incentives for counties to form Certified Unified Program Agencies (CUPAs). These incentives should include reimbursement of local costs incurred in forming and operating a CUPA so that businesses in rural counties do not pay disproportionately high fees compared to other areas in the State. RCRC also supports the reduction of non-essential reporting by CUPAs and a reduction in state administrative fees. In the event the State of California retains the administration of a local CUPA, the State should adequately reimburse counties, in a timely manner, for any costs the county incurs providing services during the absence of the CUPA.

Emergency Medical Services.

The State Emergency Medical Services Authority (EMSA) is responsible for establishing standards for the training and scope of practice for emergency medical technicians (EMTs). These standards and regulations are applicable to local governments, agencies, and other organizations that provide this training. State law also provides for the certification of EMTs through local EMS agencies, which are designated by counties. With few exceptions, RCRC counties meet these statutory requirements through participation in Local Emergency Medical Services Agencies (LEMSAs). In most instances, county supervisors serve on LEMSA boards of directors and have an important role in the governance of LEMSA activities. To promote uniformity throughout the state, the EMSA provides an allocation of state General Fund dollars to LEMSAs. RCRC supports adequate and continual state General Fund support for the LEMSAs to ensure uniform levels of emergency medical care are available to residents and non-residents of rural areas. RCRC

believes that rural county supervisors must directly participate in any EMSA proposal to restructure LEMSA funding, reconfigure LEMSA membership or implement other major policy changes.

Illegal Drugs – Methamphetamine. The production and use of methamphetamines continues to be a serious problem in rural counties. Consequently, counties - especially rural counties - must deal with the costs of law enforcement, environmental cleanup, and treatment and rehabilitation related to methamphetamine use. Additionally, methamphetamine use has a direct effect on safety and quality of life in a community and disproportionately impacts children. RCRC supports funding from federal and state sources to help counties combat methamphetamine production and provide services for recovery.

Volunteer Fire Fighting. RCRC strongly supports the right of counties to utilize volunteer fire fighters and volunteer fire departments as the official structural fire protection for any areas within their counties including all State Responsibility Area (SRA) lands as well as any other firefighting duties to which they may be assigned, such as wildland fire protection. RCRC recognizes the importance of volunteer fire fighters and volunteer fire departments and opposes any legislation or changes to regulations that would disadvantage any county that utilizes volunteer units rather than professional units. RCRC supports the current system that enables volunteer fire departments to be created and operated independently, without direct control or oversight from the county. Additionally, RCRC supports the usage of volunteers as part of a mutual aid system and encourages state and federal fire fighters and land management agencies responsible for fire fighting to recognize local volunteer firefighters as partners. Finally, RCRC will work to ensure that within the context of the SRA fee, those residents covered by volunteer fire departments qualify for any discounts available to those who have local structural fire protection.

ECONOMIC DEVELOPMENT

Economic development in rural counties encompasses a broad range of RCRC ideals including ensuring housing finance options in rural areas; maintaining county control of land use planning; protecting the agriculture and forestry industries from damaging changes in legislation, budgeting, or regulations; improving infrastructure such as transportation corridors, telecommunications, and broadband deployment; maintaining and growing tourism; and supporting advances in alternative energy such as biomass, geothermal, and municipal waste based energy.

Film Industry. California's moderate weather, variety of landscapes, scenic beauty, skilled workforce/talent and world-class production facilities draw the interest of filmmakers from across the country and around the world. The majority of RCRC's member counties maintain film commissions or offices that provide localized support and assistance to filmmakers with permit applications and

detailed location searches. RCRC supports state and local efforts to promote film-making in rural areas.

Incentives. RCRC supports state and federal incentives as a stimulus to job growth and economic improvement within our communities. However, RCRC believes in balancing these types of incentives with the importance of ensuring county revenue from sales and property taxes and preserving a county's right to plan and site new growth and development within its jurisdiction. Additionally, RCRC supports a county's right to maintain maximum flexibility and autonomy over the allotment and expenditure of any incentive dollars.

Military Presence. RCRC recognizes the importance of the defense industry to California's economy generally and in particular to the counties in which bases are located and surrounding counties. Between direct spending and the positive multiplier effect on local businesses through the spending by those military personnel and their families who live in the counties surrounding a military facility, California's military presence accounts for tens of billions in spending and hundreds of thousands of jobs, both military and civilian.

RCRC encourages lawmakers to recognize the impact base reductions or closures will have on the local economies of the small and rural counties that rely upon these bases as a financial driver for their communities.

Technology. RCRC supports ensuring that new technologies are available in rural counties to enhance their economic growth. From new biomass, solar, wind, and geothermal power generation facilities to broadband deployment to distance learning and telemedicine, new technologies are critical to the economic health and growth of rural California. RCRC supports policies that are created to make these and other new technologies available and accessible to rural areas.

Tourism. Millions of travelers from around the globe are attracted to rural California's natural beauty, colorful history, and variety of year-round recreational activities. In 2012, tourism generated \$106.4 billion in California, a 4.5 percent increase from 2011, which, in turn, directly supported 917,000 jobs, with earnings of \$32.3 billion. RCRC supports and encourages the promotion of rural California as a travel destination, as well as appropriate funding for the infrastructure and service demands created by the influx of visitors, e.g., emergency medical services systems, highway construction and maintenance, and telecommunications.

Small Business and Entrepreneurialism. Small communities are heavily reliant on small businesses for local employment, revenue generation, access to goods and services and quality of life. Small businesses and entrepreneurs are a primary source of economic growth and job creation throughout the economy and are of particular importance in rural communities with fewer large employers.

Workforce Investment Act. In 1998, Congress enacted the Workforce Investment Act to assist states with job training and employment investment. In addition to state-level oversight, local individuals (including elected officials such as county

supervisors) form local Workforce Investment Boards (WIB) to plan and oversee the workforce investment system at the local level. The local efforts are often reflected in One-Stop Centers which provide – to both employers and potential employees – access to career information, job counseling, job training, education, and other services. Monies used by local workforce investment boards are mainly derived from federal dollars and must be expended under federal guidelines and state statutes.

Rural counties have unique employment situations and factors as compared to other parts of the state. RCRC supports state and federal efforts that preserve as much local flexibility as possible to ensure the appropriate employment investment programs match the needs of local employers and employees.

RCRC advocates for workforce development policies and programs that provide job seekers the skills they need to compete in the global economy and businesses with the skilled workforce they need to maintain and grow their competitive edge. RCRC supports business-led local WIBs governed and supported by local elected officials and local leaders, the use of demand-driven and data-driven strategies within regional economies and labor markets, and access and delivery to employment training programs and services through One-Stop Career Centers.

RCRC opposes proposals that negatively impact and burden rural small businesses. RCRC encourages flexibility for economically disadvantaged and rural areas in state regulatory programs and legislative approval of state regulatory agency fees.

EDUCATION

Rural areas face unique challenges in providing access to a high quality education for all students. These challenges include low student density, long distances and challenging geography to access educational facilities, as well as weather and transportation issues. Additionally, there are fewer teachers in rural areas, which results in a limited scope of classes -- including career training courses -- that would allow the youth to stay in their communities.

Access. RCRC supports continued changes to state policy, allowing for increased access to “concurrent enrollment” (being enrolled in high school and community college classes at the same time) and other alternative types of distance learning education opportunities for students. These changes would broaden the opportunities available to rural students, such as higher-level math or science classes, that may not otherwise be available through their high school curriculum.

Community Colleges. RCRC supports community colleges receiving their full-share of state funding. Community colleges play a key role in educational opportunities in rural counties, particularly in the area of vocational education and training. RCRC supports stable funding for grant programs that fund job-training programs and changes to current law to allow community colleges to grant

bachelor's degrees in certain subject areas, which would significantly help students who reside in rural areas where there are no CSU or UC campuses.

California State Universities and University of California. RCRC supports keeping higher education affordable and accessible to students from rural, and often economically depressed, areas.

School Transportation. Home-to-school transportation plays a necessary role in ensuring student safety and accessibility to education. RCRC strongly supports the continued funding of home-to-school transportation and will work to ensure that state reimbursement rates for services in rural areas are sufficient to meet the need. Students in rural areas travel longer distances in more difficult terrain and weather than many of their urban and suburban counterparts, and the funding should reflect these potentially increased costs. RCRC supports restructuring the current system of home-to-school transportation to better allocate this funding based upon need rather than antiquated formulae that no longer reflects the requirements of many districts. Additionally, RCRC supports creating a system of funding that would stabilize the funding of home-to-school transportation.

Use of Technology. RCRC supports the utilization of distance learning to provide increased access to educational opportunities in rural areas. Professors, licensed instructors and credentialed teachers that communicate with pupils via interactive television, online courses and other appropriate means of technology have the ability to significantly broaden opportunities for students in our rural areas and throughout California.

ENERGY

California continues to face challenges to ensuring adequate electricity supply and to meeting its renewable portfolio standard goals. Rural counties support the use of alternative and renewable sources of energy, including solar, wind, biomass, hydroelectric, and geothermal. Rural counties also support increased incentives and a streamlined permitting system to encourage the development of new generation facilities.

Additionally, RCRC acknowledges that an increased focus on clean energy, energy efficiency programs, and the development of new forms of energy generation at the state and federal levels create an opportunity for new jobs and economic development in rural areas.

Biomass. RCRC supports incentives that would encourage biomass-to-energy usage, including the creation of more opportunities for biomass co-generation in rural counties through state and federal legislative and regulatory changes. RCRC supports the continued operation of existing biomass facilities. RCRC supports the use of forest as well as agricultural biomass at conversion facilities. RCRC supports having forest materials removed from timber and scrublands and being put to their highest and best use, and where possible, any revenues derived from this removal

being used to offset the cost of biomass utilization. Further, RCRC supports the broadest possible definition of biomass for use in any renewable energy standard at the state or federal levels. The definition should include material taken from any source, including public lands. RCRC supports a full life cycle analysis when determining the air quality standards for biomass power generation plants.

Land Use Authority. RCRC supports the ongoing recognition by state and federal agencies of a county or other local government's authority to exercise land use authority over commercial-scale energy projects, whether renewable or traditional, and the related infrastructure including the issuance of conditional use permits and other discretionary actions. Additionally, RCRC supports clarification of existing law to eliminate confusion relating to the jurisdiction of the California Energy Commission and the jurisdiction of local governments over non-thermal power plants.

Mitigation Measures. RCRC recognizes the California Energy Commission's (CEC) sole authority for permitting certain renewable energy power plants. However, RCRC supports efforts to require the CEC to give "due deference" to impacts and recommended mitigation measures identified by the county in which a power plant is proposed for inclusion in the CEC's proposed conditions of certification for the project.

Nuclear Power. Nuclear power should be considered part of the solution for improving California's ability to generate reliable, affordable, and clean energy, so as to benefit California's consumers, the economy, and the environment.

Rebates and Tax Exemptions. RCRC supports and recognizes the importance of state incentives in the placement of new renewable power generation facilities. However, these incentives should not be given at the detriment of county or other local government revenue streams. A county's ability to tax commercial-scale renewable energy projects must be preserved.

Renewable Portfolio Standard. RCRC supports recognition of hydroelectric power as a component under the renewable portfolio standard. Large hydropower generation should be recognized as a renewable energy source.

Additionally, RCRC supports a broad definition of renewable biomass that includes all types of plant-based material removed from all sources including agricultural lands and all timber lands regardless of private or public ownership. RCRC also supports inclusion of the utilization of municipal waste as a qualified source of renewable energy in any renewable portfolio standard.

Pacific Forest and Watershed Lands Stewardship Council (Stewardship Council). RCRC supports the implementation of the Land Conservation Plan (LCP) in accordance with the terms of the Settlement Agreement and the associated Stipulation. Protections for counties should include a requirement that the totality of dispositions in each affected county be tax neutral for that county.

Transmission Corridors. California has adopted energy policies that require substantial increases in the generation of electricity from renewable energy resources. Implementation of these policies will require extensive improvements to California's electric transmission infrastructure. While RCRC supports planning for future transmission needs, RCRC opposes the preemption of local land use authority in connection with state or federal designation of transmission corridors.

ENVIRONMENTAL QUALITY

State regulatory agencies often develop programs based on a "one-size-fits-all" approach that fails to recognize realities in different locations of the state. Environmental quality compliance costs can be disproportionately high in rural counties because of geography, low population density, and fewer available resources. Bearing the cost of these regulations can be especially burdensome for rural counties.

RCRC strives to reduce or prevent unnecessary regulatory requirements while promoting practical and cost effective environmental quality practices that reflect the actual threat to the environment. RCRC supports prioritizing environmental inspections, compliance reporting, and regulatory enforcement activities that are consistent with the need for environmental protection and the preservation of public health.

AIR QUALITY

Air District Boards. RCRC supports the establishment of policy by local air district boards. RCRC opposes the placement of state appointees on local air district boards.

Emission Standards. RCRC supports extending the compliance date in rural counties for retrofitting diesel engines in public fleets and off-road equipment. RCRC supports exemptions for rural counties that do not have the resources to meet regulatory requirements and encourages financial assistance from the State Air Resources Board to foster compliance. RCRC supports tailoring regulations to address the quantity of emissions actually generated in rural counties.

Land Use Authority. RCRC opposes any new statewide air quality standards that restrict counties' land use authority.

ENVIRONMENTAL IMPACT ASSESSMENT

California Environmental Quality Act (CEQA). Counties, as "lead agencies," conduct the CEQA review required for both public and private projects. Counties, therefore, have a unique and critical perspective on CEQA. The misuse and abuse of CEQA wastes scarce public resources that would otherwise fund essential public services.

RCRC supports efforts to streamline the CEQA process to strengthen the certainty of required timelines. RCRC opposes limiting or reducing the authority provided to lead agencies under CEQA. RCRC supports facilitation of early agency and public participation in the CEQA process to allow the lead agency and project proponents to more fully address environmental concerns resulting from a proposed project and to facilitate preparation of a legally adequate environmental document. RCRC supports legislation that limits the circumstances under which a challenge for noncompliance with CEQA can be filed, eliminates awarding of attorney's fees to the plaintiff in CEQA challenges, and specifies that a lead agency does not have a the public review period. RCRC opposes CEQA-related legislation that would make it duty to consider, evaluate or respond to comments received after the expiration of more difficult for rural counties and rural residents to access the court system.

California Communities Environmental Health Screening Tool. The California Environmental Protection Agency (CalEPA) and the Office of Environmental Health Hazard Assessment (OEHHA) released a tool in 2013 to screen the environmental health of California's communities. The California Communities Environmental Health Screening Tool (CalEnviroScreen) model uses existing exposure, environmental, health, sensitive population, and socio-economic data on a geographic basis to create and compare the cumulative impact scores of environmental pollution for the state's communities. The stated intent of the tool is to provide state and local decision makers with information that will enable them to focus their time, resources, and programs on those portions of the state or jurisdiction that are most in need of assistance. RCRC opposes the use of the tool as a substitute for a focused risk assessment for a specific area or site, or as the basis for any regulatory, permitting, or land use decisions or studies.

National Environmental Policy Act (NEPA). RCRC supports a reassessment of NEPA and efforts to streamline and improve NEPA. RCRC supports an expedited NEPA analyses process for categories of projects where experience demonstrates that such projects do not result in a significant impact to the environment. RCRC also supports increasing opportunities for local involvement and changes that provide greater weight to local comments.

Regulatory Reform. RCRC supports federal and state agency review of all existing and proposed regulations, as well as quasi-regulatory actions such as permits, policies, and guidance documents. Federal and state regulatory agencies should consider the costs and benefits associated with public and private sector compliance, as well as the cumulative impact of all existing and proposed regulations and quasi-regulatory actions on regulated entities. RCRC supports changes to the law that would require more in-depth analysis of the fiscal impact of new regulations and reduce the overall financial impact threshold before such fiscal analysis is required for all new regulatory actions.

WASTE MANAGEMENT AND RECYCLING

Disposal Bans. RCRC supports advance statewide planning for convenient identification and recovery of all materials and products prior to banning from California landfill disposal or requiring separate handling or processing. RCRC maintains that manufacturers and retailers must actively contribute to establish programs to cover the costs for disposal, recycling, special handling, and/or any public education required for their end-of-life products, before any such disposal bans are implemented.

Extended Producer Responsibility. RCRC supports producer responsibility for financing and arranging the collection and recycling of their products at end-of-life. Producer responsibility removes the financial burden from local governments and makes recycling become a cost of doing business. Placing the responsibility with manufacturers/retailers will additionally provide incentive for products to be redesigned in a manner to eliminate or reduce their impact and to increase their recyclability. RCRC prefers producer responsibility through product take-back by the manufacturers/retailers. RCRC will consider the reasonable use of Advanced Recycling Fees and Advanced Disposal Fees.

Electronic and Universal Waste. RCRC supports the proper disposal of electronic and universal waste through programs that place the cost of compliance on manufacturers and consumers rather than on county-operated landfills or waste management programs.

Jurisdictional Compliance. RCRC supports using program-based criteria to determine jurisdictional compliance with statutory waste diversion requirements that incorporate rural considerations. RCRC opposes numerical justifications on program implementation that do not include rural considerations.

Incentives. RCRC favors the use of “incentive-based” policies to promote local waste diversion activities and to encourage regulatory compliance at publicly operated solid waste facilities, rather than the threat of state-imposed financial penalties. Where appropriate, rural considerations should be incorporated into these policies to properly reflect the costs commiserate with the effort to regulate rural sites.

Incentive Funding. Recognizing that the costs for solid waste regulatory compliance are disproportionately high in rural areas of the state, RCRC supports the continuation and expansion of grant programs and funds that provide needed financial assistance to implement and maintain local waste diversion activities and to support community-based household hazardous waste management programs.

Local Control. RCRC opposes any loss of local land use control with respect to the siting and environmental review of new solid waste collection, disposal, and processing facilities.

Permitting. RCRC supports “tiered” solid waste facility permitting and operating requirements with reduced administrative and operational requirements that are commensurate with the limited environmental and public health risks associated with small-volume facility operation in low-density population areas.

Increasing Diversion/Decreasing Disposal Mandates. State law requires municipalities to divert at least 50% of the solid waste generated in their jurisdiction. The California Department of Resources Recycling and Recovery, (CalRecycle) which enforces this mandate, allows some rural counties flexibility in meeting these mandates through either a ‘Rural Reduction in diversion requirements’ or compliance through a ‘Good Faith Effort.’ Recently-enacted legislation now establishes a statewide goal of 75% of solid waste to be reduced, recycled, or composted. As the state works to the 75% statewide goal, RCRC believes municipalities should be given additional tools that allow them to assist in achieving the new statewide diversion goals. Such tools should include, but are not limited to, extended producer responsibility, an easing of the permitting restrictions for organic waste processes and other solid waste activities, model program guidelines, and increased funding.

RCRC recognizes that organic materials in landfills are a major contributor to methane gas production and alternative treatment systems need to be pursued. However, any regulatory requirement needs to consider existing infrastructure and capacity, the economic feasibility of new facilities, and provide the flexibility for phasing-in various regions and areas of the state, especially in rural counties.

Financing State Solid Waste Disposal Programs. State law requires that \$1.40 be collected for every ton of solid waste disposed in a California-permitted landfill, commonly referred to as the ‘Tipping Fee.’ Proceeds from the current \$1.40 tipping fee are deposited into the Integrated Waste Management Account (IWMA) and used by CalRecycle to enforce solid waste laws and provide grants to municipal jurisdictions to assist in the management of many solid waste products. As solid waste disposal decreases, the fund potential decreases and will not be able to sustain CalRecycle programs into the future. CalRecycle and other agencies with enforcement authority over solid waste facilities are turning to their fee authority to augment decreasing IWMA funds. RCRC supports a reasonable increase in the Tipping Fee as a preferred alternative to additional new state agency inspection/enforcement program fees and as part of a comprehensive effort to identify a stable and equitable funding source to assist counties in complying with solid waste management programs. RCRC does not support an increase in the Tipping Fee or other funding mechanisms for projects and programs that are not part of a direct effort to manage and reduce the amount of solid waste.

Alternative Daily Cover. State and federal law require that the working face of landfills be covered at the end of each working day with dirt, tarps, or “alternative daily cover (ADC)”, such as shredded automobile fluff or green waste. For many rural counties, green waste is the preferred ADC. As part of the calculation in determining a counties diversion rate, counties can use the recycled green waste for

landfill cover and count this amount into their diversion rate. RCRC strongly supports preserving the use of green waste materials for ADC as a viable reuse option and that ADC not be considered disposal.

FEDERAL AFFAIRS

Many actions taken by the federal government – both in Congress and within the Administrative agencies -- have a direct impact on rural areas, especially those counties in California that contain large amounts of federal land. RCRC is committed to working with members of Congress and our Agency partners to develop legislative and regulatory policy that complements local and state policy, funds vital county and state programs, and does not preempt local and state authority.

Budget. RCRC supports the timely passage of the federal budget. Many county and state programs rely on federal funds to survive, including monies for health and social services, infrastructure, environment, public safety, and education. Long extensions and delays in the budget process cause unpredictability for these vital programs and local and state officials are responsible for trying to fill the funding gaps.

Infrastructure. RCRC supports continued federal commitments and funding for the nation's infrastructure, including housing, transportation, water, telecommunications, and natural resources. In particular, RCRC strongly supports the continued commitment of the federal government to reimburse rural counties for the loss of revenue – tax and resource generated – on federally held lands located in our counties. The continued reauthorization of full funding of the Secure Rural Schools and Community Self Determination Act and the Payment in Lieu of Taxes (PILT) program is vital to rural economies.

In addition, federal laws that govern and fund vital county programs and services such as the Surface Transportation Act, Federal Aviation Administration Act, the Farm bill, Water Resources Development Act (WRDA), the State Children's Health Insurance Program (SCHIP), the Patient Protection and Affordable Care Act (PPACA), the Workforce Investment Act, the Telecommunications Act, annual appropriations bills, and other ongoing federal programs are critical to the continuance of a vibrant rural way of life.

Natural Resources. RCRC supports the development of a long-term comprehensive federal and state strategy to manage our federal lands to actively prevent wildfire and promote multiple-use land designations. RCRC will work closely with the United States Forest Service (USFS) as they continue to create and implement the Cohesive Strategy for addressing these issues. Additionally, RCRC supports efforts to streamline and modernize the Endangered Species Act.

Relationship with Public Lands Management Agencies. RCRC represents counties that have regulatory and public trust responsibilities over the natural resources in their jurisdictions. In a number of our counties, the federal government manages well over half of the land mass. RCRC supports a strong relationship with the federal government to integrate county policy into federal land management decisions to better balance conservation with economic strength and quality of life.

RCRC supports local government involvement in public land use planning decisions at the earliest possible time in order to facilitate the best possible working relationship and outcome for any decision. RCRC supports the strengthening of coordination efforts by public land management agencies to engage counties earlier and in a more meaningful manner in planning decisions made on public lands within the respective counties. RCRC supports a true government to government role for county officials in the development of land use planning decisions for public lands within their jurisdictions. Plans for public land management should be as consistent as possible with local land use plans. When it is not possible to bring disparate plans together, the land management agencies should provide an explanation as to why the final plan needed to follow a divergent path from the local land use plans.

Additionally, RCRC encourages state agencies working with federal land use agencies to work to enhance the relationship between federal land use agencies and local governments within California, and encourages the use of tools such as the Memorandum of Agreement between CSAC, RCRC, BLM, and USFS, or cooperating agency status when appropriate to the needs of the county, to achieve better communication between all involved agencies, and to improve outcomes for rural communities.

Telemedicine. RCRC strongly supports additional advancements, policy changes, and funding mechanisms regarding the expansion of telemedicine as a means to improve access to healthcare, especially specialty care, in rural areas.

HEALTH AND HUMAN SERVICES

FISCAL PARTICIPATION

Rural counties have various levels of fiscal responsibility for health and human services programs. For example, counties are required to provide health services to the indigent population of the county not covered by any other health care. In most RCRC counties, this is provided through the County Medical Services Program (CMSP) which is funded by the member counties' realignment revenue. The counties share fiscal responsibility with the state and/or federal government for a number of services and programs, such as California Children's Services (CCS). Often the county role is an administrative function that should be fully reimbursed by the state and/or federal government, and program costs should be cost neutral or negligible.

County Medical Services Program. RCRC supports the continuation of the County Medical Services Program (CMSP) beyond the January 1, 2014 start date of implementation of health reform. Counties will be left with responsibility over a residual population of those currently served by CMSP even after the shift of those newly eligible for Medicaid and Medi-Cal. RCRC will continue to work to preserve the integrity of the structure of the CMSP program and to ensure adequate funding continues to be allocated to it to meet the needs of that residual population.

Realignment. RCRC supports local flexibility in the administration and implementation of programs funded by realignment. RCRC supports adequate funding and appropriate distribution of realignment funds to counties to ensure that counties can continue to meet their legal obligations for providing Health and Human Services. RCRC acknowledges that some realigned programs may be better administered and funded at the state level and supports an evaluation of such potential transfers.

RCRC also supports full and prompt reimbursement of the state and/or federal share of social services, mental health, public health, and indigent medical care program costs. RCRC believes that the state should assume cost increases associated with state-imposed program changes and expansions, as well as federal maintenance of effort mandates.

Funding Reductions. RCRC opposes state and/or federal funding reductions that shift responsibility for services, administration or fiscal support to rural counties.

Human Services Funding Deficit/Cost of Doing Business. RCRC supports prompt and complete reimbursement of county costs associated with county administration of state, federal, or shared state/ federal social services and health programs.

Food Access. RCRC supports appropriate changes to state law that would enable California to draw down the full federal funding available for low- or no-cost nutrition programs including Cal Fresh (formerly food stamps) and the school lunch program.

HEALTH CARE

It is important that the medical and public health services available in rural counties meet the needs of the residents and provide appropriate and accessible care. Due to geographic isolation and limited infrastructure availability, attracting and retaining health care providers in rural counties can be difficult. Rural areas are unable to utilize economies of scale to decrease costs and depressed economic conditions lead to large publicly-funded populations with low provider reimbursement rates, making recruitment and retention of health care providers difficult in rural areas. Between implementation of federal health care reform, realignment, provider-rate cuts and clawbacks, the state and federal government must work with rural counties to develop strategies to ensure better, and prevent

the loss of all, access to medical services for these critically underserved California residents.

Access to Health Care. RCRC acknowledges that health insurance coverage, whether public or private, does not guarantee access to care. RCRC supports incentives and programs which train, recruit, and retain health and mental health care professionals to provide services in rural areas. To this end, RCRC encourages cooperation and communication between state agencies, offices, departments, and boards, as well as the Legislature, federal agencies and rural health advocacy organizations to affect this ultimate goal.

RCRC also supports policies that require private and public health plans to offer comprehensive, affordable care to rural county residents and establish reimbursement parity between rural medical providers and those in other areas of the state. RCRC encourages cooperation between providers, insurers, appropriate state departments, CalPERS and other stakeholders in the rural health community to develop incentives and guidelines for health insurance coverage in rural areas.

Health Professionals. RCRC supports innovative programs and financial incentives to increase the number of medical professionals in rural areas. Scholarships and loan assistance programs are proven incentives that encourage health professionals to practice in rural areas and become active community members. Additionally, RCRC strongly support a change to state law to permit hospitals to directly hire physicians, a step which would greatly enhance access to physicians for rural patients.

Innovation. RCRC supports and encourages the inclusion of rural counties in pilot projects and innovative approaches within new and existing health, mental health, public health, and social services programs.

Medical Injury Compensation Reform Act. RCRC strongly supports the current MICRA law and will work to maintain its integrity in the face of challenges by those who would weaken its provisions. RCRC recognizes that any threat to MICRA would be costly for all Californians, but particularly harmful to rural areas where medical access is the most limited already. Any significant increase in medical liability insurance rates threatens existing MICRA protections, and thereby reduces access to healthcare to patients in rural and underserved areas.

Public Health Services. RCRC supports adequate and appropriate state and/or federal funding for public health services, including those unique to rural areas. These include, but are not limited to: environmental health, public health nursing, bioterrorism/pandemic flu planning, county public health laboratories, and the prevention and control of infectious disease.

Rural Hospitals. RCRC supports state and federal efforts to finance and fully staff rural hospital operations, including capital and seismic-retrofitting needs. RCRC also supports proposals that allow rural hospitals to directly employ

physicians, thereby increasing access to providers. Additionally, RCRC supports efforts to improve provider reimbursement rates and ongoing attempts to mitigate the harm caused by the 2011 provider reimbursement rate cuts. Continued cuts to provider rates, especially those to facilities such as distinct part skilled nursing facilities and other specialties such as pharmacy and medical transportation, creates serious risks to healthcare in rural and remote areas of California.

State Prison Inmates. RCRC opposes proposals that allow the state prison system to establish release policies for inmates in need of medical, mental health, substance abuse, or social services without commensurate local funding, consistent/appropriate discharge planning, coordination/cooperation with county staff, and assurance of local treatment capacity. RCRC supports the concept of ensuring that the application processes of inmates eligible for state Medi-Cal and/or other health and human services programs funded by the state or the federal government are completed before the time of release, such that the inmate does not become a drain on county-run health and human services programs upon release. We urge the state to allocate funding for this purpose within the prison system, and to collaborate with counties to ensure that applications are appropriately completed.

Technology. RCRC supports state and federal funding for programs that promote quality medical education and treatment in rural areas through the use of technology. Telemedicine, teledentistry, and technology-based medical education can provide residents of rural areas with opportunities for medical care that would not otherwise be available without extensive travel and additional cost.

2-1-1. RCRC supports the concept of the 2-1-1 system, which creates an easy information clearinghouse that can be utilized by the public to access health and human services, emergency and disaster information, and other local private and county services.

HEALTH CARE REFORM

In March 2010, President Obama signed into law the Patient Protection and Affordable Care Act (H.R. 3590) and the Health Care and Education Affordability Reconciliation Act of 2010 (H.R. 4872) – setting in motion the largest restructuring of our nation’s health care system in several decades. Since that time, we have moved from a discussion of federal health reform proposals to actual implementation at the federal, state and local levels. While several provisions of the law have scattered effective dates spanning the next several years, the main thrust of the law began January 1, 2014.

RCRC recognizes that the cost of health care and health insurance has more than doubled in the last ten years, while the ability of individuals and businesses to afford medical coverage is shrinking with the recent economic downturn. RCRC also recognizes that the delivery of health care services in rural areas faces a particular set of challenges that must be addressed in any health care reform implementation.

Access and Outreach. RCRC strongly encourages state and federal implementers of health reform to focus resources and efforts on ensuring access to providers in rural areas, and initiating outreach efforts to increase the pool of medical professionals in those underserved areas. Even with the onset of implementation the provider pool is still extremely limited in certain areas of the state. RCRC continues to encourage that funding be spent on ensuring equal access to the benefits of this new law to rural residents.

County Funds. RCRC supports ongoing safeguards to realignment and other county funding streams. Counties continue to retain the obligation to fund health care services to the medically indigent; those individuals without access to health care other than county-provided care. These services continue to be managed in most RCRC counties by the County Medical Services Program (CMSP). RCRC supports adequate funding for CMSP, as many responsibilities will remain under Welfare and Institutions Code Section 17000. RCRC opposes any health care coverage expansion that would lead to an increase in the scope of Section 17000 obligations on counties.

Health Plan Coverage Areas. For any health care reform policy to be successful, health insurance plans must be required to include rural California in their coverage areas and must be required to contract with local, accessible medical providers for care delivery.

Small Business. RCRC opposes strategies that negatively impact small businesses in rural areas. Often small businesses are the cornerstone of rural economies. The imposition of excessive fees or health insurance requirements on small businesses has the potential to destroy local industry and commerce, and thus deprive rural areas of jobs and services.

INFANTS, CHILDREN AND YOUTH

RCRC recognizes the need to dedicate time, talent and resources for services to infants, children and youth. This is a critical investment in the future of rural counties. Therefore, children's welfare programs must have appropriate levels of funding and staff. Moreover, to avoid a cost-shift to the rural counties, these programs also must provide a sufficient funding base for both administration and direct services at the local level.

Program Simplification. RCRC supports the simplification of program enrollment processes, the integration of children/youth services, and the closure of the gaps between the stand-alone programs.

Local First 5 Commissions. RCRC supports efforts that sustain the local First 5 Commissions' focus on the prenatal-to-five age groups and protect the California Children and Families Act (Proposition 10) revenue sources for this distinct purpose. RCRC opposes any proposal that would restrict the authority of local First

5 Commissions to determine and approve all local Proposition 10 funding distributions.

Foster Youth. RCRC supports programs that assist our foster youth with housing, employment, medical care and education assistance as they transition to emancipation.

Child Welfare Services. RCRC opposes funding cuts to the array of local child welfare services to at-risk infants, children, and youth. RCRC supports local flexibility in the administration of these programs to allow for situations unique to rural counties.

Medical Workforce. RCRC supports workforce training, recruitment and retention programs for pediatricians, pediatric dentists, pediatric anesthesiologists, child psychologists, and other specialty care for children in rural areas.

Health Coverage for Low-Income Children. RCRC supports state and/or federally-funded outreach to enroll children and youth in Medi-Cal.

State and Federal Funds. RCRC supports efforts to maximize federal funding for programs that serve low-income and/or vulnerable children and youth, specifically Medi-Cal. Both draw down a considerable federal match, stretching California's scarce resources.

INFRASTRUCTURE

Counties are responsible for planning for future growth and property development, management of natural resources, and the provision of public services. Consequently, counties have and must retain the primary responsibility for land use and development decisions. With increased development, counties are responsible for increased needs including public services and infrastructure. Funding for infrastructure from state and federal sources must be retained and increased. RCRC believes that state requirements for general plan adoption should be limited to major planning issues and should be used to ensure procedural uniformity.

Housing is an important element of economic development. However, the need for new housing units at the lower income levels exceeds the number of new units for which financing and subsidies are available. Therefore, additional funding is necessary to increase production of lower income housing units. Further, a greater emphasis at the state level should be placed on obtaining financing and enabling production, rather than undertaking and satisfying extensive planning requirements at the local level in housing element law.

In addition to housing, properly maintained roads are vital to the safety of the driving public, the movement of goods, economic development, and quality of life in rural counties. The state must increase highway funding in rural areas because

sufficient funding has not been available to preserve and maintain the existing secondary and local road network. California's infrastructure is deteriorating, in some places to the point where public safety, mobility, and viability are threatened.

HOUSING FINANCE

Home Ownership. RCRC supports state and federal laws to help increase opportunities for home ownership, including allowing local housing agencies the ability to offer financing to a broader range of individuals through higher median income standards and increased purchase price limits.

Partnership Opportunities. RCRC supports changes to real estate lending laws to provide the CRHMFA Homebuyers Fund with greater opportunities to partner with private and governmental mortgage lenders.

Rural Emphasis. RCRC supports state and federal housing finance programs that recognize the unique aspects of the rural housing market and earmark funds for distribution to rural areas.

LAND USE PLANNING

Land use authority is the jurisdiction of local government. While California as a whole is approximately 50% publicly owned land and 50% privately owned land, many rural counties have a substantially higher percentage of publicly owned land, with one county having less than 2% privately owned land within its boundaries. It is imperative that local government retain land use authority in order to provide the appropriate mix of development within each community. RCRC is opposed to any policy that would infringe on this authority.

Eminent Domain. RCRC supports the authority of local governments to plan for and oversee development in their jurisdictions. RCRC supports the authority of counties to utilize the tools available to manage growth, including eminent domain. The decision to condemn property is a public policy decision for elected officials, not a legal issue. Exercising eminent domain by taking private property and transferring it for purposes of private gain or use is not supported by RCRC.

Regional Housing Needs Allocations. The regional housing needs allocation (RHNA) process should take into consideration the lack of residential infrastructure and other special considerations of rural communities. RCRC supports the transfer of assigned housing needs allocations between a county and a consenting city (ies), requiring notice to the allocating entity upon agreement between the jurisdictions.

Regional Planning. RCRC supports coordinated regional planning between local agencies to address regional impacts of growth, including transportation and other infrastructure, air quality, housing, resource production and protection, and public services. RCRC opposes land use authority being transferred to regional agencies without the consent of the local jurisdictions.

Land Use Planning. RCRC believes any changes to the state land use planning policies and process should be done within the existing planning framework and not by creating an additional layer of law or regulation, which threatens local land use authority. RCRC opposes any state attempt to preempt local planning policies, processes and decisions, and the imposition of new programs and responsibilities without funding.

Housing Elements. RCRC supports the continued recognition that local jurisdictions are not responsible for housing production, but must plan for its share of housing needs. Therefore, if a jurisdiction has a certified housing element, it should not be economically penalized for not meeting housing production goals.

Housing Element Self-Certification. RCRC supports simplifying the housing element process by allowing counties to self-certify housing elements.

Incentives. RCRC will be proactive to ensure incentive funds are available to rural counties and local jurisdictions. RCRC supports the priority for planning funds to go to local jurisdictions, which can assign the funding and planning function to another regional agency. RCRC recognizes that infrastructure funds for local improvements are a key component to smart growth and will be proactive to ensure rural county access to these monies.

RCRC supports reevaluating the existing requirement that small counties adopt a housing element before receiving federal CDBG and HOME grants. This requirement currently does not apply to larger counties.

Land Acquisitions. RCRC supports working with agricultural interests, environmentalists, and federal and state officials to develop long-term solutions to mitigate the impacts of large land acquisitions in rural counties.

Prevailing Wage for Public Works. RCRC supports changes to the methodology for determining the prevailing wage to allow consideration for the differences between urban and rural areas. Prevailing wages appropriate for large urban areas can result in a significant increase in labor costs for public works projects in rural areas.

Smart Growth. The development of any smart growth principles should incorporate the realities of rural communities and preserve local autonomy over land use. RCRC supports smart growth principles on a scale appropriate to the local communities.

State Agency Coordination. State agencies should notify potentially impacted counties of actions that may affect land use prior to initiation of the proposed action and provide an opportunity for local engagement. State agencies should coordinate their actions with affected counties and with existing local, state, and federal land use plans.

Surface Mining and Reclamation. RCRC opposes efforts to limit or reduce the authority of counties under the State Mining and Reclamation Act (SMARA).

Wildlife Corridors. Consideration of identified wildlife corridors should be provided in the development approval process to reduce the impacts of wildlife displacement. The identification of wildlife corridors should not result in regulatory impacts on private landowners.

TRANSPORTATION

Aviation Funding. RCRC supports continuation of state subsidies for general aviation airports in rural counties. These funds help defray operational and capital costs at these small rural facilities. Additionally, RCRC supports reauthorization of and increased funding for federal aviation programs that encourage and enable rural commercial air service. Without these subsidies many areas of California would not be connected to the national air travel system.

Development Planning. RCRC opposes the use of state transportation funds as an incentive or reward for adoption of prescribed land use principles and development plans by local governments. RCRC also opposes the diversion of dedicated transportation funds for housing and development purposes.

Federal Surface Transportation Act. RCRC supports the timely reauthorization of the federal transportation authorizing legislation, Moving Ahead for Progress in the 21st Century Act (MAP-21), which is due to expire at the end of the 2013-14 Federal Fiscal Year. RCRC strongly supports a surface transportation policy focused on preservation and maintenance of the existing highway system, including the secondary or rural highway network, and connectivity between local, regional and statewide transportation systems. In California, the secondary highway network serves as a connector to urban centers, a farm to market route and a path to our natural tourism areas. RCRC supports increasing the overall funding level for the next federal surface transportation bill to better meet the growing infrastructure needs of the nation as well as dedicated revenues for locally-owned bridges and high-risk rural roads. RCRC supports funding for public transportation and transit. RCRC advocates for secure revenues to ensure the Highway Trust Fund remains solvent.

RCRC supports an equitable distribution of federal transportation funds to California to better align with the amount of taxes California's citizens contribute to the national program. RCRC encourages federal and state transportation policy-makers to recognize and prioritize the infrastructure and safety needs of rural areas. RCRC supports increased flexibility for rural transportation planning agencies and supports streamlining efforts to deliver projects more efficiently and effectively.

RCRC supports the creation of a National Freight Program to target funds to projects to help the movement of products throughout California and the nation. However, any such program must recognize the rural areas of the state and require

funding be spent on the farm to market connectors and the roads that serve as alternatives to the Interstate system for large volume freight traffic.

Transportation Funding. RCRC supports the retention of a dedicated funding source at the local, state, and federal level for transportation programs. Annual revenues must be predictable to enable rational long-term planning at the local, regional and state level. To that end, in the effort to implement MAP 21, RCRC supports distribution formulas that recognize a statewide transportation network which includes rural highways, roads and bridges.

State Highway Relinquishment. The California Streets & Highways Code allows the state – via an act of the Legislature and final approval of the California Transportation Commission – to relinquish segments of state highways to local entities (cities and counties) provided those local agencies can absorb the on-going costs of the segment. The California Department of Transportation’s policy is that relinquishments of a segment should not occur when those segments contribute to an inter-regional connection. RCRC supports relinquishment only when the segment does not negatively impact a vital or primary inter-regional connection or when relinquishment would not disrupt the ability to transport people and goods efficiently from one region to another (i.e. from rural areas into urban areas).

LOCAL GOVERNMENT FINANCING

With voter approval of Proposition 1A in 2003, local government property tax revenue is no longer to be taken by the state. Proposition 1A was a major step in protecting local government revenues. However, counties need additional funding if they are to fulfill their state-mandated and traditional roles.

Financial actions taken by the State Legislature and the Governor have direct impacts on California’s rural counties. Many rural counties rely on special state assistance, including but not limited to, law enforcement, emergency medical services, environmental health, and small airfields. RCRC is committed to working with all members of the Legislature and the Governor to ensure that the budget process maintains these vital services when these services are difficult to maintain solely on local revenues.

Agricultural Commissioners. RCRC supports a level of funding sufficient to implement the mandated pesticide use enforcement programs conducted by County Agricultural Commissioners. We oppose continuing the program without sufficient funding.

Bond Funds. RCRC supports the efficient and effective use of state bond funds and the maximization of federal funds. RCRC supports geographically equitable distribution of bond funds, accountability for bond fund expenditures, and the incorporation of input from local officials when spending priorities are determined.

RCRC supports funding formulas that establish a reasonable minimum amount rather than an amount based on population.

Cooperative Wildlife Services. RCRC supports restoration of state matching funds for county participation in federal Cooperative Wildlife Services programs, which bring greater scientific knowledge and efficiency to local wildlife management programs.

Disaster Funding. The State General Fund has been the traditional source to fund CAL FIRE, the Governor's Office of Emergency Services (OES), and other disaster-related agencies. In recent years, there have been proposals to provide additional revenues and/or lower the obligations of the State General Fund, including, most recently an SRA fee to fund CAL FIRE.

RCRC supports a new revenue stream that is broad-based geographically, reflecting the fact that the activities of statewide disaster agencies benefit all Californians; CAL FIRE and other state emergency response agencies respond to all types of disasters including fire, floods, earthquakes, hazard materials spills, and terrorism, as well as vehicular and medical responses in Local Responsibility Areas, State Responsibility Areas and Federal lands. However, any new disaster management fee/tax must be in lieu of the existing SRA fee, not in addition to, and must include the unequivocal repeal of the SRA fee when this new revenue stream is created.

Counties should not be in the role of administering and/or collecting new revenues; however, in the event counties are required to perform an administrative/collection function, counties must receive full cost-recovery. With the addition of any new revenue sources, portions should be permanently dedicated for disaster prevention activities at the local level.

RCRC supports full funding of disaster relief for all eligible counties. Any changes to the structure of, or eligibility for, disaster assistance from the state must be feasible, both financially and from a staffing perspective, for all counties, even the smallest, least populous, and most rural counties in California. RCRC opposes any changes to, or limitations upon, the eligibility for receipt of the local portion of the mandatory state share of disaster costs. RCRC opposes tying county land use processes and decision-making to disaster relief funding.

Any changes to the current system of enhanced reimbursement for disaster funding that require changes to a county general plan should be tied to the timing of each county's regular update of its general plan, rather than to a specific date. If eligibility for enhanced reimbursement is to be an incentive for good planning and prevention, a program of self-certification must determine proof of such, rather than through costly on-site visits. As to fire disaster specifically, RCRC opposes any requirement for enhanced reimbursement for fire disaster that mandates a central countywide fire authority or classifies volunteer or tribal firefighters differently than professional firefighters.

RCRC supports the continuation of federal disaster assistance to states and counties, and encourages federal lawmakers to consider the impacts of any changes to the existing funding mechanism on small, rural counties with low population, minimal staff and fiscal resources, and aging or non-existent infrastructure.

There are several limiting factors in states and ultimately counties receiving disaster relief assistance from federal resources. First, a disaster declaration is only made if the amount of damage reaches a certain level of financial impact, based upon certain findings of how much of the population of a county was affected and the amount of financial impact to a single county. Due to the small number of California counties and the way that population and financial resources are spread throughout the state, the current system of disaster declarations is disadvantageous to California counties by requiring far more widespread and extensive damage than the amount of damage that is necessary to reach the threshold for declaration in counties in other states. RCRC supports changes to the current system of disaster declaration qualification, such that California counties are more likely to be eligible for formal declaration of disaster.

Homicide Trial Funding. RCRC supports continued state funding of the extraordinary costs of major homicide trials in small counties to ensure that such counties will not face bankruptcy.

2011 Realignment. In 2011, the Legislature and the Brown Administration enacted a comprehensive realignment of criminal justice programs and services to counties as well as realigned the funding of a variety of health and human services programs. Funding for the realignment scheme is currently set in statute through a dedication of 1.065% of the state portion of the sales tax rate and a limited amount of vehicle license fee revenues. The realigning of the health and human services programs started in the beginning of the 2011-12 fiscal year while the criminal justice realignment – via AB 109 – took effect on October 1, 2011. While RCRC did not endorse the 2011 realignment, RCRC supports maintaining a variety of constitutional protections which were enacted to dedicate funding for the costs of meeting these demands. Such protections are:

- continuous appropriation of funds to counties;
- enhanced realignment program/services must be accompanied by commensurate state/federal monies;
- state shall assume the cost of any changes made by the federal government to programs subject to 2011 Realignment;
- state shall assume the costs when a federal court or administrative proceeding results in monetary penalties and/or increased costs against a county for performing the administration of 2011 Realigned programs;
- If the revenues that currently fund realignment are reduced/cease to be operative, the state is required to provide replacement revenues that are equal to or greater than otherwise would have been provided. If the state fails to provide the appropriate amounts, the State Controller shall transfer the appropriate amount of money to counties on a monthly basis. These payments should have priority over other state obligations.

RCRC also supports the continuation of dedicated state revenue streams for local law enforcement programs which are now incorporated into the 2011 Realignment scheme, including the Rural and Small County Law Enforcement Program, the Citizens Option for Public Safety and the Juvenile Justice Crime Prevention Act. These programs are currently funded primarily through a portion of vehicle license fee revenues and RCRC opposes any redirection of these vehicle license fee monies unless a replacement revenue stream is provided.

Municipal Bankruptcy. In 1949, California finalized the procedures for allowing municipalities to access federal bankruptcy laws (Chapter 9). California is one of eight states that have enacted authorizing statutes with unrestricted access to the Chapter 9 process. Only one county in California (the County of Orange in 1994) has filed under Chapter 9 since the creation of this option. RCRC believes that there is no need to deviate from the current, long-established policy of unrestricted access to the Chapter 9 process. RCRC opposes efforts that interfere, inhibit or delay a county's ability to seek bankruptcy protection in order to best manage their fiscal affairs. RCRC believes that any state interference jeopardizes a county's ability to avoid bankruptcy and/or impedes the ability of a county to continue providing the services required under state and federal law.

Property Tax Allocations. Some counties are experiencing "insufficient ERAF" which results in less property taxes flowing into the county treasury. This is a result of complex state funding formulas which determine the allocation of local property taxes to jurisdictions within a county. RCRC supports efforts – through a state budget augmentation and/or a new statute – which guarantee that counties (and cities located within those counties) are made whole when there is insufficient allocation of property taxes due to state-determined formulas. In addition, RCRC supports the allocation of "Supplemental Property Taxes" when state-determined formulas do not provide for proper disbursement to jurisdictions in counties. Finally, RCRC supports legislative efforts to allocate property taxes known as "excess ERAF" to cities, counties and special districts within the county where "excess" property taxes are generated.

State Crime Laboratories. Most rural counties rely on forensic crime laboratories operated by the state Department of Justice to assist in investigations and prosecutions. In order to provide uniform quality and consistent forensic services, the Legislature established these laboratories for use by municipalities. RCRC opposes efforts to impose and implement a fee schedule for counties when using these laboratories.

Off-Highway Vehicles. RCRC supports the collaborative efforts of the OHV stakeholders' roundtable to resolve contentious issues. RCRC opposes the requirement for a local match in the Off-Highway Vehicles grant program.

Payments-in-Lieu of Taxes. RCRC strongly supports the reauthorization and continuance of full funding of the federal Payments-in-Lieu of Taxes (PILT)

program to help counties offset the loss of property taxes from public land ownership. RCRC strongly supports full funding and payment to counties each budget year for the state PILT program administered by the California Department of Fish and Wildlife (DFW). RCRC also supports payment in full of the arrearages due to counties by the DFW for the state PILT program.

Federal Payments to Schools and County Roads. In 2000, Congress enacted the Secure Rural Schools & Community Self-Determination Act. The Act was created to provide a guaranteed payment option to counties and schools located in forested areas in light of dramatic reductions in monies derived from timber harvesting on national forest lands. Proceeds provide rural counties and school districts with funding for a number of services including road maintenance and day-to-day school operations. The Act has been reauthorized several times and various reauthorization Acts include a “ramp down” of payments to local jurisdictions.

RCRC supports the timely reauthorization of the Secure Rural Schools Act. RCRC recognizes that the 2000 law was not a permanent federal funding source for counties and schools districts, but rather a temporary funding scheme to assist in an economic transition due to declining federal timber harvesting receipts. However, stakeholders, in coordination with the Administration and Congress, have yet to agree on an alternative, permanent funding source – consistent with historic payment levels – to support counties and schools with national forest lands. Therefore, RCRC supports reauthorization of the Act and aims to preserve funding levels which are adequate and reflect the federal government’s commitment to rural communities. RCRC continues to support the development of creative permanent funding solutions into the future.

Proposition 36. RCRC supports adequate state funding for Proposition 36 programs at the county level and flexibility in using these funds to provide drug treatment services for non-violent drug offenders.

Resource-Based Fees. RCRC opposes the use of resource-based fees to balance the state budget. With such a large percentage of the state’s natural resources located in our member counties, the citizens of rural counties can be unduly impacted by fees based upon those resources. As these resources benefit the state and the public at-large it is appropriate that the General Fund provide some level of support for resource related programs. The current practice of eliminating or reducing General Fund support for these programs and the resulting increased reliance on user fees, places an unfair and inequitable burden on rural communities.

State Budget. RCRC supports the timely adoption of a truly balanced annual state budget. Many county programs rely on state and federal pass-through funds to survive, including monies for health and social services, infrastructure, environment, public safety, and transportation. Long delays in the budget process create an unpredictable fiscal situation for counties and make it difficult for counties to manage and budget.

Transient Occupancy Taxes. RCRC recognizes that the Transient Occupancy Tax is an important local government revenue stream for many tourism-dependent rural counties. In 2008, RCRC Counties collected \$238.4 million in Transient Occupancy Taxes (TOT), providing a critical source of flexible local funds. Therefore, RCRC strongly opposes any efforts to exempt any taxable lodging sites or travel booking services/agents from the collection and payment of local TOT.

User-Based Fees and Assessments. RCRC opposes the expenditure of user-based fees and assessments to finance general or special benefit programs that are not directly related to the service for which the fee or assessment was initially established.

Unfunded Mandates. RCRC supports reforming the mandate reimbursement process to make it more reliable and timely for counties.

Williamson Act. RCRC supports reinstatement of state subvention funding to counties to provide compensation for reduced property taxes on lands that have Williamson Act contracts.

Williamson Act subventions were a significant contributor to the General Fund of many rural counties. This revenue represented as much as 15 percent of some rural county budgets and provided counties with one of their few sources of discretionary dollars for essential public services many of which are delivered on behalf of the state.

For over forty years, the state funding of the Williamson Act had proved to be one of the state's most effective on the ground programs for encouraging the preservation of existing farmland, open space and habitat in California.

RCRC will continue to work with agricultural, environmental and local governmental organizations to explore state funding and other sources sustainable funding as well as potential changes to the program itself.

MILITARY BASE CLOSURES

While the defense industry remains a critical economic industry in California behind tourism and agriculture, Department of Defense (DoD) in California has declined \$3.2 billion (11%) while rising \$60 billion (42%) in all states in the aftermath of the base closures. DoD spending in California is currently about \$26 billion with a workforce of nearly 200,000, including military and civilian personnel. There are 26 bases in California today.

During the four previous rounds of base closures, California lost 24 bases representing 25% of the bases closed nationwide. Additionally California lost nearly 100,000 jobs while the other 49 states combined lost approximately 80,000 jobs.

These base closures resulted in an estimated loss of \$9.6 billion in annual revenues for California.

Five RCRC member counties house military facilities: Imperial County – El Centro Naval Air Facility; Inyo County – China Lake NWC, Lassen County – Sierra Army Depot; Mono County – Marine Corps Mountain Warfare Training Center; and, Yuba County – Beale Air Force Base. Although the majority of military facilities are not located in RCRC member counties, the effects of their closure would potentially impact nearby RCRC counties. Some of the possible impacts of base closures on surrounding local communities include the loss of property taxes and sales taxes.

Base Reuse. RCRC supports incentives for economic reuses that are developed in coordination with the impacted local government(s) should any facilities close.

Disproportionate. RCRC believes consideration should be given to the disproportionate contribution local communities in California have already made to the streamlining of the military's base infrastructure. California shouldered a disproportionate burden of closures during previous BRAC rounds, suffering a 60% cut in net personnel despite housing only 15% of the nation's military personnel.

Economic Impact. RCRC believes strong consideration should be given to the economic impact of closures on existing communities in the vicinity of military installations and supports legislative efforts to provide state and federal economic assistance to areas that suffer because of such base closures or realignments.

Geographic Capacity. RCRC supports consideration of the importance of geographic capacity to accept future missions and their operating, research, design, testing, and evaluation requirements. Rural areas of the state provide access to large areas of operational airspace and land that will be a key to future military operational and training requirements.

Inactive Status. RCRC opposes the retention of facilities in an inactive status; this has a significant negative impact on the local community due to its inability to realize job creation through economic reuse of the site. Additionally, it delays the necessary cleanup of potential contamination prior to transition to any future use. Temporary deactivation does not generate any state and local revenues and would be blight on the surrounding communities.

Placement. RCRC supports the placement of out-of-state realignments at existing California military facilities.

Retention. RCRC supports retention of military bases in California to be operated in the most cost-effective and beneficial manner to the state and the people of the United States.

Toxic Cleanup. RCRC supports the swift cleanup of any toxic materials from bases that have already been closed in previous BRAC rounds to enable their

economic reuse prior to any further base closures in California. Delayed base cleanup can delay property transfers and reuse, hurt the economic revitalization of nearby communities, harm the environment or public health, and increase environmental risks.

NATIVE AMERICAN AFFAIRS

The expansion of Indian Gaming and other businesses on tribal lands has made an impact on rural counties beyond the boundaries of those lands. The compacts adopted under the Davis Administration failed to require environmental review and mitigation of the effect of such projects, and failed to establish guidelines for county jurisdiction over health and safety issues or require payment by tribes for their fair share of the cost of local government services. Moreover, compacts entered into by the Schwarzenegger Administration have been overturned in the courts, disallowing direct payments from tribes to the state General Fund. RCRC supports efforts to either amend existing compacts or establish new compacts to require each tribe to negotiate with the appropriate county government on the impacts of business projects and impose binding arbitration on the tribe and county if they cannot agree on the terms of a mutually beneficial agreement.

Agreements. RCRC supports the requirement for judicially enforceable agreements between tribes and local jurisdictions.

Construction and Expansion. RCRC supports requiring tribal governments that seek to construct or expand a casino or other business that would impact off-reservation land to involve the county government in the planning process and ideally to obtain the approval of the local jurisdiction.

Fee-to-Trust and Federal Acknowledgement. Many tribes are attempting to acquire land outside of their current trust lands and are seeking that additional land be placed into federal trust in order to secure the ability to develop businesses. Recent case law (Carcieri) has invalidated many fee-to-trust transactions because the tribes seeking trust land were not recognized before 1934. RCRC opposes any “quick fix” legislation that would re-validate the current fee-to-trust system without reforming the current process to better accommodate the interests and concerns of local governments in the regions affected by fee-to-trust application. RCRC opposes the shift of land from fee-to-trust without community input.

RCRC urges the Bureau of Indian Affairs (BIA) to include language regarding involvement of local government input, specifically, and in addition to, extensive public input from stakeholders when working towards the restructuring of the way the federal government formally acknowledges an Indian tribe. Additionally, RCRC believes that any new federal acknowledgement process should be accompanied by a new fee-to-trust process that mirrors a high level of local government involvement.

Local Business Equality. Recognizing the current revenue generation and potential expansion of tribal lands and businesses, RCRC encourages equal

enforcement of all appropriate tax laws and requirements on tribal businesses, in order to ensure a level playing field for local businesses and to ensure fairness in revenue generation within counties.

Mandatory Mitigation. RCRC supports a requirement that future Indian Gaming compacts provide for full mitigation of local impacts including infrastructure load and local law enforcement issues from gaming. Mitigation should be provided through either the Indian Gaming Special Distribution Fund (SDF) or through a judicially enforceable agreement between local jurisdictions and tribes. RCRC supports full funding of the SDF or alternative funding source for full funding of local mitigation to provide badly-needed revenues to the counties and local governments affected by tribal gaming.

Tribal Fire Fighting. RCRC strongly supports the right of counties to utilize contracts or other agreements with tribal fire fighters and tribal fire departments as the official structural fire protection for any areas within a county, including State Responsibility Area (SRA) lands, as well as any other firefighting duties. RCRC recognizes the importance of tribal fire fighters and tribal fire departments and opposes any legislation or changes to regulations that would disadvantage any county that utilizes agreements with tribal firefighting entities, rather than other types of firefighting units. Additionally, RCRC supports the usage of tribal fire departments as part of a mutual aid system, where appropriate, and encourages all other entities responsible for fire fighting to recognize tribal firefighters as partners.

Tribal Gaming Compacts. Recognizing the potential expansion of tribal gaming facilities and anticipating the renewal of current gaming compacts, RCRC encourages the inclusion of greenhouse gas mitigation strategies in all new and renegotiated tribal gaming compacts.

NATURAL RESOURCES

RCRC member counties cover nearly half of California's total land mass. RCRC represents local governments that have regulatory and public trust responsibilities over the lands, surface waters, groundwater resources, fish and wildlife, mining, and overall environmental quality within their respective jurisdictions.

RCRC member counties stretch from the northern border with Oregon to the southeast border with Mexico, from the Central Valley to the Sierra, and from the coast to California's wine country. Although these rural areas are abundant in natural resources and agriculture, most of the State's population lives in the urban coastal areas and below the Tehachapi Mountains.

Rural counties support conservation of natural resources. Abundant natural resources are a key component of the history, economic base, and culture of California's rural counties. A strong working relationship between counties and public land managers is crucial for rural counties that rely heavily on a resource-

based economy. RCRC will continue its ongoing efforts to create a better working relationship between member counties and the federal agencies that manage lands within member counties.

ENDANGERED SPECIES

Endangered Species Protection. RCRC supports efforts to streamline and modernize the state and federal Endangered Species Acts, and the state's Fully Protected Species Act. RCRC supports a more comprehensive and integrated approach, as opposed to a single-species approach, in order to help balance species protection with the economic and social consequences that may result from such protection, including compliance costs. RCRC supports increased public collaboration throughout the development of "reasonable and prudent" measures during the Endangered Species Act consultation, NEPA and CEQA processes.

Federal and State regulatory agencies should adhere to the highest professional scientific standards to justify their biological conclusions and recommendations. The resulting scientific conclusions and recommendations should be subject to independent scientific peer review.

On the state level, RCRC does not support changes to the existing responsibilities of the Department of Fish and Wildlife and the Fish and Game Commission.

FOREST MANAGEMENT

Fire Prevention. RCRC supports community-focused fire prevention policies that balance environmental protection with the preservation of life and property. RCRC supports finding solutions that will better protect our communities and the environment from the catastrophic effects of wildfire, including detriments to air and water quality, loss of habitat, forced evacuations, and other devastating environmental and societal losses.

RCRC supports realistic policy and regulatory reforms that could lead to better mitigation of wildfires on federal, state and private lands. RCRC encourages an increase in state and federal financial resources being put toward prevention either in grants to aid local agencies in the management of forestlands, including preparation of fire management plans for WUI areas and implementation of fuel reduction programs; or in direct dollars spent towards "on-the-ground" projects.

RCRC supports expansions, including diameter limit increases, to existing exemptions from timber harvest plans for wildfire prevention vegetation management. Additionally, RCRC supports other tactics to improve forest management and reduce wildfire risk within California's forests including: incentives for increased forest biomass utilization; continuation of and expansions to the federal stewardship contracting program; utilization of cap-and-trade funds for fuels management work, and other traditional and non-traditional avenues to increasing the amount of vegetation management that can be completed in and around our rural communities. These fuels reduction efforts are necessary in order

to prevent fires, improve the health of the forest and the watersheds, and maintain these resources for wildlife habitat as well as tourism and recreation.

RCRC will seek new and non-traditional partners with whom to collaborate on solutions to the ever-increasing threat of wildfires to our rural communities specifically, and to California as a whole.

Fire Protection and Prevention Decision-Making. RCRC supports active outreach on the part of state and federal land managers to engage counties and local government officials in decisions regarding fire prevention and protection activities on federal lands that may affect the health and/or safety of residents or visitors of the surrounding communities.

Community Wildfire Protection Plans. RCRC supports local collaboration between fire services, civic leaders, community citizens, and other stakeholders to develop community wildfire protection plans (CWPPs). CWPPs should include broad-based approaches to fire prevention on federal, state, and private neighboring lands. CWPPs, when fully implemented, should provide a step in the right direction towards mitigating the destructive effects of wildfires.

Oak Woodlands. RCRC supports the conservation of oak woodlands but strongly believes that local planning authorities should control the protection of oak woodlands in areas of oak woodland scarcity, not the state through legislative mandate.

Federal Fire Fighting. RCRC urges the United States Forest Service (USFS) to work with local governments, local fire agencies, and CAL FIRE, to adopt a strategy that is similar to, and equally comprehensive as, CAL FIRE's stated mission of protecting resources, lives, and property on any California lands subject to a balance of acres swap between CAL FIRE and USFS. While RCRC recognizes that the USFS and CAL FIRE have distinct missions, RCRC strongly believes that the USFS must be responsible stewards of California's forested lands, which includes working to preserve the safety of the lives, homes, businesses, and property of those who live in and around federal lands.

Sierra Nevada Framework. RCRC supports the administrative review process of the Sierra Nevada Framework. RCRC supports managing the Sierra Nevada national forests to increase the presence of native tree species, reduce fire-prone vegetation, and decrease forest density. RCRC supports prioritization of fuel reduction projects in wildland/urban interface areas, municipal watersheds, and areas prone to insect and disease infestation.

Timber Harvesting on Private Lands. RCRC opposes additional requirements that would further increase the cost of Timber Harvesting Plans (THP's) or make the approval process more onerous. Additional THP costs and/or a more onerous process would result in a potential increase in fire and insect and disease risks, thereby further jeopardizing rural communities that are located near private

forestlands. RCRC supports efforts to reduce or streamline the regulations on private forest owners for vegetation management work for fire prevention. RCRC supports an increase to the diameter limit of existing THP exemptions for such purposes.

LAND CONSERVATION

Conservation Easements. RCRC supports a broader use of state funded limited term conservation easements as opposed to permanent easements. Although federal government programs provide funding for term easements, the state's current policy prevents full utilization of this funding option.

Invasive Species. RCRC supports state and federal funding to increase public awareness of invasive species as well as to facilitate their removal and reduce harmful economic and environmental impacts that result from the spread of these species, such as the degradation of agriculture, water quality and water supply issues, and increased wildfire danger.

Land Acquisition. RCRC believes the following key factors must be considered in any conservation acquisition: protection of property rights, willing buyer/willing seller, local land use authority, and the maintenance of productive working landscapes consistent with local land use plans. Any local government that may be impacted should be notified when a conservation acquisition, in either fee title or an easement, is being considered.

Special Land Use Designation. RCRC supports multiple-use land designations for national forests and other federal lands. Where special land-use consideration is desirable, RCRC supports a five criteria evaluation: 1) designations must be supported by local governments, 2) the permissive tools of land management must be capable of preserving and protecting the landscape's natural features in perpetuity, including protection from wildfire and disease and insect epidemic, 3) designations must be generally consistent with historical and present uses, 4) designations must contribute to the future anticipated demand for national forest and federal land uses, and, 5) a balance of diverse uses must be maintained within a reasonable geographic vicinity.

State Owned Land. The current state land acquisition system needs reform. A key element of that reform must include a thorough analysis of existing holdings based upon criteria that is developed in accordance with each agency's mission, goals and available resources. Current state holdings should be analyzed and measured against those criteria to determine whether it is appropriate that those properties be in state ownership.

WILDLIFE MANAGEMENT

Rural counties have regulatory and stewardship responsibilities for the natural resources within their jurisdictions, as well as public health and safety responsibilities including the protection of life and property. Rural counties require

effective predator management tools within wildlife management regulations and policy decision making.

Loss of natural habitat through natural processes, such as drought and wildfires, as well as human made alterations, has caused wildlife to migrate to populated areas in search of food and water. Human-wildlife conflicts include the potential for physical injury or loss of life, property damage, and the spread of contagious wildlife diseases that pose threats to humans, other wildlife, domestic pets and livestock.

Cooperation. RCRC encourages federal and state decision-makers to work cooperatively with counties to ensure that effective wildlife management tools are available at the local level that strike a balance in wildlife management decisions, legislation and protection of this public resource.

Funding. RCRC supports federal and state funding for wildlife management programs.

Research. RCRC supports continued research on wildlife and predator management.

Wildlife Management. RCRC supports local, state and federal wildlife management programs, including the United States Department of Agriculture Animal and Plant Health Inspection Services (USDA-APHIS) wildlife damage management activities, and the California Department of Fish and Wildlife trapping license program, as well as efforts by the County Agricultural Commissioners to disseminate wildlife management educational information to the public.

STATE CORRECTIONS SYSTEM

Facing a federal court order to reduce the prison population, the Legislature and Brown Administration continue to enact measures to reduce the overall prison population. However, California's current prison system remains overcrowded. The facilities that comprise the state prison system were designed for nearly 100,000. Further work needs to be done for the State to comply with the federal court order which requires the population to be 137.5% of capacity (a target level of approximately 110,000).

In 2013, the Legislature enacted Senate Bill 105 (Steinberg) to provide counties with funds available at the state level because of a reduction in convicted felons because they are being transferred to county jails. This is modeled after Senate Bill 678 (Leno) (2009), which allows counties to share in the cost-savings when certain convicted felons do not re-offend and are subsequently re-committed to the state prison system. RCRC supports continued funding for SB 105/SB 678 programs to ensure that counties and the state minimize recidivism.

Mitigation for the Expansion of Existing Prisons. RCRC supports requiring that the State and the Department of Corrections mitigate the local impacts of a new prison facility or the expansion of an existing one. In addressing these mitigation needs, the State and the Department must work with the affected counties and their Boards of Supervisors. The scope of issues for mitigation should include impacts to water services, wastewater treatment/storage/disposal, transportation, health care services, education, fire protection and law enforcement.

Early Release. RCRC remains concerned about any effort to reduce the current prison population (which, due to realignment, now contains the most violent and serious offenders) by granting 'Early Release' to offenders. If the Legislature is to sanction early release, RCRC believes additional state resources should be provided to local governments in anticipation of increased law enforcement costs and a variety of social services demands.

Legal Costs. RCRC supports State funding for counties' district attorneys and public defenders for the cost of prosecuting/defending serious/violent felonies that have allegedly been committed at state prison facilities. RCRC also encourages the Legislature to provide counties where there is a significant state prison population additional resources to address the costs of detaining persons awaiting trial for crimes allegedly committed while in state prison.

Social Services. RCRC believes social services, mental health, and other health programs for state prison inmate parolees that remain under state supervision should be provided and funded by the State. The State should also provide full funding for social services provided to inmate families.

TELECOMMUNICATIONS

RCRC supports the deployment of new technology in California and the equitable regulatory treatment of all forms of telecommunications services. RCRC strongly encourages both the federal and state government to focus telecommunications policies on deployment to rural areas. The state and federal government must ensure that legislative and regulatory schemes to promote deployment and competition should protect both consumers and local government authority.

Access. The state and federal government should require or provide incentives for build-out that encourage investment in all communities and neighborhoods, especially hard to reach rural areas. Incentive-based approaches, including grant funding, would help support the deployment of new technology in underserved and un-served rural areas of California.

Broadband Deployment. RCRC supports federal and state efforts to achieve 100 percent broadband deployment in the United States. Federal and state grant funds, and other incentive programs, should be targeted to projects for deployment to unserved areas, and the expansion of service, including the development of redundant systems, in underserved areas. Both the Federal and state government

should recognize the difficulty rural governments and rural providers may encounter in financially contributing to a high match requirement for deployment projects. Grant programs should allow local governments, directly and through public-private partnerships, to be an eligible applicant, and should include a waiver option to increase the federal or state contribution for projects that reach rural locales.

Customer Service. Customer Service Standards should be locally regulated with local complaint resolution. Standards should meet or exceed standards set forth by the Federal Communications Commission (FCC).

Emergency Systems. RCRC recognizes the importance of communication between public safety personnel during emergency situations, and supports the establishment of a dedicated, nationwide interoperable public safety broadband network. Additionally, all telecommunication providers should be required to observe long standing emergency notification protocols for both the national Emergency Alert System and local emergency announcements.

Public, Educational, and Governmental Programming (PEG) and Institutional Networks (INET). All communications service providers should provide, carry, and support (for both capital and operations expenses) Public, Educational, and Governmental (PEG) channels. Additionally, providers should continue the commitment to provide INET services to public facilities, such as government buildings and libraries to help connect local governmental services.

Revenue Protection. Any new franchise scheme (federal or state) must be revenue neutral for all counties. Local franchise fees, taxes, permit fees, etc. must be incorporated into any new franchise financing arrangement.

Rights-of-way. Counties must maintain control of the local rights-of-way and continue to manage access to local streets and sidewalks.

VETERANS' AFFAIRS

RCRC believes that all veterans should be recognized for their service to our county. RCRC supports ensuring that the full panoply of services for veterans is available to those who are residents of rural counties. Access to retirement housing, military healthcare, employment after discharge, and community reintegration are all issues affecting our veterans in rural areas. Several forms of specialized military training, including firefighting and law enforcement duties have high value in civilian life, but current law often does not fully recognize that training. These special skills are highly-valuable to rural areas where it is difficult to recruit and retain, and expensive to license those licensed professionals.

RCRC supports changes to the law that would allow specialized training completed during military service to qualify as training for non-military employment, where

appropriate, to better speed re-integration of the veterans into the communities and to grant rural counties a pool of well-trained individuals to fill needed roles in the community such as firefighting and law-enforcement without needing to bear the cost of duplicative state-mandated training. RCRC supports full funding for state veterans programs, especially those that draw down a federal match. Additionally, RCRC supports county efforts to have full flexibility in creating opportunities and giving assistance to veterans in their communities, such as low or no-cost permitting.

WATER

Nearly 75 percent of California's available water originates in the northern one-third of the state (north of Sacramento), while over 75 percent of the demand occurs in the southern two-thirds of the state. Much of the available runoff eventually flows into the Sacramento and San Joaquin rivers. Both of these rivers flow through the Central Valley and meet in the Delta.

State Water Plan (SWP). The State Water Plan (Bulletin 160) has become a strategic planning document that describes the role of State government and the growing role of California's regions in managing the state's water resources. RCRC has been an active participant in the ongoing development of the State Water Plan Update as a member of the Public Advisory Committee, and is currently participating in that same capacity during the development of the 2013 Update. It is important to ensure that the rural county/local government perspective is taken into consideration during the development of the State Water Plan policy recommendations.

Water Infrastructure. RCRC supports all cost effective means of increasing California's water supply that are consistent with these Policy Principles. RCRC supports significant new state and federal investment in our statewide infrastructure to help increase regional self-sufficiency for all regions of the state. Water storage gives water managers the flexibility needed to meet multiple needs and provide vital reserves in drier years. Reliance solely on the reallocation of existing supplies to address water supply shortages would potentially be short-sighted in that serious legal conflicts could ensue. Primary reliance on demand reduction would also be short-sighted as doing so could cause serious economic impacts without increasing the statewide water supply. RCRC supports the development of additional proposed surface storage projects if they are determined to be both feasible and economical.

Water Infrastructure Financing. RCRC supports the "beneficiary pays" principle, meaning that beneficiaries who directly benefit from a specific project or program should pay for their proportional share of the costs of the project or program. Costs should not be shifted to those that do not benefit. "Public benefits," benefits that are public in nature, should be funded by state and federal sources. "Affordability" should be factored into the determination of the proportional share of the costs. State and federal sources of funding should, for example, fund all or a

significant share of the proportional costs for disadvantaged and/or low income communities.

BAY-DELTA

The Sacramento-San Joaquin Bay-Delta (Bay-Delta) is the heart of the state's surface water delivery system and supplies drinking water to 25 million people. This water is vital to the state's trillion dollar economy. The Bay-Delta Estuary is also home to 750 plant and animal species, and supports 80 percent of the state's commercial salmon fisheries.

Various activities are ongoing with respect to the Bay-Delta, including the development of the Bay-Delta Conservation Plan (BDCP), the Delta Stewardship Council's Delta Plan, and the State Water Resources Control Board's Bay-Delta Plan.

Bay-Delta Conservation Plan. The intent in developing a Bay-Delta Conservation Plan (BDCP) is to meet the requirements of the Federal Endangered Species Act (FESA), the California Endangered Species Act (CESA), and/or NCCP Act to allow for the Delta-export operations of the Central Valley Project (CVP) and the State Water Project (SWP) to proceed within a stable regulatory framework.

“Activities” that would be covered by the BDCP include conveyance elements of the SWP and the CVP, maintenance and facility improvements of the SWP and CVP, project operational activities, and projects designed to improve salinity conditions.

Conveyance. RCRC recognizes that the Bay-Delta is an important economic and environmental resource benefiting all of California. It is RCRC's intent to work with all interested parties toward a successful resolution to the Bay-Delta's complex problems.

Assurances/Water Rights/Area of Origin. Programs or facilities implemented or constructed to improve Delta conditions, such as the Delta Plan or BDCP, must not result in redirection of unmitigated, adverse impacts to the counties and watershed of origin. Acceptable assurances must be provided to upstream water right and water entitlement holders. State and federal agencies must adhere to State water rights law, including State law relating to water rights priorities and area of origin and watershed of origin protections.

Delta Flows. The Department of Water Resources should continue to be responsible for meeting its obligations for flow-related water quality objectives as required by Decision 1641. The BDCP should acknowledge that the parties to the BDCP have full responsibility to satisfy any flow obligations required by the State Water Resources Control Board to mitigate for impacts caused by BDCP implementation.

Fees/Taxes. The south of the Delta exporters have agreed to pay for the cost of Delta conveyance which is appropriate as they will directly benefit. Implementation

of a Bay-Delta HCP and/or NCCP will be very costly. The BDCP should lay out in detail how it will be financed, the benefits that the parties to the BDCP will receive, and any benefits that the public is expected to receive and pay for. Costs should be apportioned on the basis of benefits received. Public trust and other public benefits should be paid for by general obligation (GO) bond proceeds and/or state and federal general tax revenues. RCRC opposes general fee authority for any administrative entity, including the Delta Stewardship Council.

Geographic Scope. The geographic scope of the HCP and/or NCCP must be limited to the Bay-Delta as defined in Section 12220 of the California Water Code.

Mitigation. Areas upstream from the Bay-Delta shall not be required to mitigate impacts to the Bay-Delta that have been caused by the construction and operation of the SWP and CVP.

Term 91. Term 91 limits diversions when the SWP and the CVP are contributing water from their stored water to meet water quality standards and other environmental objectives in the Delta. State and/or federal agencies should not apply regulatory authority, such as Term 91, to senior water-right holders or water users relying on area of origin water rights.

Water Rights. Water rights and water supplies of upstream communities should not be adversely impacted by the construction, operation or management of new water conveyance facilities.

Water Supply Reliability. New projects will be needed to meet current and future water supply needs in the areas of origin as well as throughout the rest of the state. State policy should support the development of local surface and groundwater storage projects and other local programs to assure water supply reliability statewide.

California Water Commission. The California Water Commission (Commission) will be responsible for allocating the funding for statewide water system operational improvements contained in the 2014 water bond. The Commission is also required by statute to quantify the public benefits of storage. RCRC will continue to closely monitor the activities of the Commission, and engage as needed on issues of importance to member counties.

Delta Stewardship Council. The Delta Stewardship Council (Council) is charged with overseeing the implementation of a comprehensive management plan for the Sacramento-San Joaquin Delta. RCRC will continue to closely monitor the activities of the Council, and engage in the implementation of the Delta Plan as needed on issues of importance to member counties.

FLOOD CONTROL AND MANAGEMENT

The Department of Water Resources (DWR) is the lead agency for FloodSAFE California – a program to improve integrated flood management statewide with a

significant emphasis on the Central Valley and the Delta. Integrated flood management addresses both aspects of flood risk: taking actions to reduce the frequency and severity of floods, and taking steps to reduce or mitigate the damages caused when floods happen.

Agencies at every level of government have some responsibility for flood control and management, and construction costs are shared among federal, state, and local agencies. Eliminating unacceptable risks of flood damage statewide will take decades and require significant resources.

One of the key issues facing local government is the issue of development in flood prone areas.

Central Valley Flood Protection Plan (CVFPP). Implementation of the CVFPP will be conducted through the Department of Water Resources' (DWR) Regional Flood Management Planning efforts. RCRC supports the development of plans that will present the local agencies' and public's perspectives of flood management, and contain a prioritized list of feasible projects that need to be implemented to reduce flood risks in each region.

Development in Flood Prone Areas/Floodplain Mapping. RCRC supports federal funding for and the continued updating of FEMA maps, supplemented by state maps, to assist local governments in better understanding the flood risks from reasonably foreseeable flooding.

National Flood Insurance Program (NFIP). The current NFIP establishes extremely burdensome flood insurance rates and places an economic burden on agricultural communities by imposing highly-restrictive flood protection building regulations. Many agricultural buildings and structures cannot be effectively flood proofed to meet current NFIP standards, but could be built to withstand a flood, making their repair less expensive than existing flood-proofing options. RCRC supports the creation of a new agricultural flood hazard area under the NFIP that allows for replacement and reinvestment in agricultural production, storage, and processing buildings, and commercial and community structures in established agricultural areas and rural communities. Flood insurance must be accessible at a meaningful and affordable rate for the property owner.

Flood Control Subvention Program. RCRC opposes the reduction or elimination of the state share of local flood control subventions. RCRC supports full funding of subvention payments and the reimbursement of past unpaid subventions to local government and local agencies.

Funding. RCRC supports significant new state and federal investment in our statewide flood control infrastructure, including funding from the State General Fund and the issuance of General Obligation or Revenue Bonds, before the state attempts to impose cost sharing fees/taxes on those who live and work behind levees.

Land Use Authority. RCRC opposes state preemption of local land use authority. Land use decisions must remain at the local level.

WATER QUALITY

Enforcement. Regulatory water quality enforcement actions should be focused on achieving compliance as opposed to the imposition of punitive financial penalties that serve only to make it more difficult for local agencies to achieve compliance. RCRC supports mandatory minimum penalty relief for small and disadvantaged communities.

Non-Point Source Discharges. RCRC supports flexible, cost-effective approaches to monitoring water quality, and scientific evaluation of water quality impacts from agricultural discharge and storm water runoff. Management measures to address non-point sources of pollution should be based on technically and economically feasible control measures.

Onsite Wastewater Systems. RCRC opposes new regulatory requirements that restrict the use of onsite wastewater systems unless there is scientific evidence that such restrictions are needed to provide meaningful benefits to water quality.

Safe Drinking Water Act/Clean Water Act. RCRC supports efforts to streamline and modernize the Federal Safe Drinking Water Act and the Federal Clean Water Act (CWA).

Total Maximum Daily Loads (TMDL's). RCRC supports the integration of the TMDL process with a local watershed approach to water quality improvement, combined with sustainable levels of state and federal funding and/or technical assistance. RCRC opposes multiple layering of TMDL's within watershed regions. RCRC opposes an exemption from CEQA for TMDL's. The CEQA process is very important as part of the decision making process in order that potential adverse impacts that may result from TMDL implementation be considered and disclosed.

Wastewater Discharges. RCRC supports the review of existing water quality objectives and beneficial use designations in an effort to reduce costly discharge monitoring and permit compliance requirements that do not provide significant improvement in receiving water quality. Where feasible, RCRC encourages the use of wastewater to preserve potable water for beneficial uses.

Water Boards Governance. RCRC supports the loosening of federal restrictions that limit the ability of locally elected governmental officials to serve on Regional Water Quality Control Boards because of income restrictions associated with the fact that local jurisdictions are required to have Water Board-approved discharge permits (the "10% Rule"). The 10% Rule has been a major stumbling block for city and county representatives who wish to serve on the regional water boards.

On the state level, RCRC supports elimination of procedural barriers that limit the ability of local government (and other stakeholders) to meaningfully access decision-

makers and that make it difficult to obtain full and fair hearings on all matters before Regional Water Quality Control Boards.

Water Treatment Systems. RCRC supports continued funding assistance for small and economically disadvantaged communities, especially in rural areas, to upgrade water and wastewater treatment systems. Water quality and wastewater discharge regulations are becoming more stringent and will continue to require substantial new investment in water treatment facilities.

Watershed Management. RCRC supports local voluntary community-based collaborative watershed management planning and implementation as a means to enhance and protect water quality and other natural resources.

Wetlands. The State Water Resources Control Board (State Water Board) has previously addressed the “gaps” in wetlands protection resulting from the 2001 U.S. Supreme Court decision in *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers (SWANCC)* with the adoption of general waste discharge requirements for minor discharges to non-federal waters in 2004. The State Water Board staff is proposing the adoption of a phased policy to protect wetlands and riparian areas which would expand the definition of “wetlands” beyond that of the federal definition and established Corps standards. RCRC opposes the State Water Board adopting a California-specific definition of wetlands. The policy would also expand wetland regulation to include wetland-related functions, riparian areas, and riparian area-related functions as well as all perennial, intermittent, and ephemeral watercourses. RCRC is concerned with the proposed expansion of wetlands regulation and will continue to participate in the policy development discussions.

WATER SUPPLY

RCRC believes that the state should take the lead role in planning and implementing those features of the state’s water infrastructure than can only be met through statewide efforts. RCRC supports pursuing water supply and reclamation funding at the federal level as part of a broader Western Water measure that also contains a watershed component.

Groundwater. RCRC supports the management of groundwater at the local level. The effective and efficient management of water quality and supply for beneficial uses is best managed by local jurisdictions. RCRC supports adequate state and federal technical and financial assistance for local agencies in order to either remediate groundwater overdraft or maintain groundwater levels at a safe yield. California’s groundwater resources are diverse and one-size-fits-all state mandates should be avoided. RCRC supports the adoption of county ordinances to protect groundwater against overdraft from out-of-county exports.

Integrated Regional Water Management. RCRC supports state and federal funding assistance to regions so they can leverage local dollars to develop and implement Integrated Regional Water Management Plans. Integrated regional

water management will play an important role in meeting the state's water needs and aid regional self-sufficiency. RCRC supports the development of Integrated Regional Water Management Plans (IRWMPs) through a public, grass-roots planning process that includes all interested stakeholders, especially when developing the IRWMPs goals, objectives, and evaluation criteria. IRWMPs should provide access to State funding for water and wastewater projects that benefit disadvantaged communities and small rural communities. IRWMPs governance structure should not override local jurisdiction authority. Elected jurisdiction representatives voting capacity should not be minimalized to a nonrelevant factor through increased IRWMP membership of non-government entities. Acceptance of grant awards should not require applicant's acceptance of policy, goals, objectives not established or in draft form.

Seawater and Brackish Water Desalination. RCRC supports seawater and brackish groundwater desalination where it is a viable option. Additionally, RCRC supports the streamlining of the approval process for these projects, and state and federal funding for needed research. Seawater and brackish water desalination projects have the potential to play an important role in the state's water supply mix, and to help realize the overall goal of water self-sufficiency for all regions of the state. This benefits the state as a whole and helps protect water areas of origin.

Urban Water Conservation/Agricultural Water Use Efficiency. State and local urban water conservation and agricultural water use efficiency programs should be flexible and incentive-based. The term "water conservation" is used to mean any reduction in applied water use and "water use efficiency" is used to mean using water more efficiently to reduce demand for a given set of beneficial uses. To be successful, urban water conservation and agricultural water use efficiency programs should be designed and implemented by locally-elected officials. Local officials are in the best position to determine what activities and/or actions are locally cost-effective. Implementation of urban water conservation and agricultural water use efficiency programs must be consistent with existing state law that protects against loss of water rights for conserved water (Water Code Section 1011.)

Water Recycling. RCRC supports increased utilization of recycled water and continued state and federal support through appropriate technical and financial assistance. Recycled water increases the available water supply, reduces the demand for freshwater supplies, reduces wastewater discharges into rivers, creeks, bays, and estuaries and increases regional self-sufficiency. Water that is developed through recycling should be credited toward local water use reduction goals.

WATER TRANSFERS

RCRC generally supports locally-approved short-term water transfers between willing buyers and willing sellers as one way to meet short-term needs and maximize existing resources. Long-term transfers that involve permanent fallowing/retirement of non-drainage impacted agricultural lands or provide for the substitution of groundwater for transferred surface water should be designed with consideration of how the transfer might affect third parties and the social and

economic conditions in the county. Support of the local community is key. Water transfer revenues should be used to provide local benefits, such as: flood protection, water supply, water conservation, water quality, maintenance of low water costs for local water users, and environmental enhancement

Transfers involving the permanent fallowing/retirement of agricultural lands should include a monitoring program to track changes within the region and a third-party action plan. Groundwater substitution transfers should include a groundwater monitoring and reporting program and a third-party action plan.

Water Rights. RCRC supports the State's existing water right and water right priority system. The vested water rights of water users must be inviolate. Water rights established by state law and state laws relating to use of water should be respected by federal agencies.