

**Modoc County
Board of Supervisors**

Established in 1874



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Mark Bradford, Chairman
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive
Rancho Cordova, CA 95670-6114

February 11, 2025

RE: Upper Pit River Watershed Exemption

Dear Chairman Bradford:

The Modoc County Board of Supervisors (County) appreciates the opportunity to comment on the potential granting of a full exemption from the Irrigated Lands Regulatory Program (ILRP) for the Upper Pit River Watershed. The County supports and strongly encourages the granting of a full exemption.

Agricultural production in the upper Pit River Watershed is vastly different from the high-intensity, high-input farming that occurs in the Central Valley. This area is dominated by federal ownership of the Sage Steppe rangeland and forested mountains. High elevations and short growing seasons limit production to primarily forage crops. These lower-value crops necessarily limit substantial high-cost inputs of fertilizer and pesticides. Farming practices work in concert with the geographical and climatic conditions. Consequently, irrigated pastures, mostly enhanced versions of the naturally occurring meadows, are prominent. Many of these acres have gone unchanged or without being replanted for decades.

During these years of monitoring, extensive training and support have been provided by a multitude of agencies to assist our producers in maintaining water quality through best management practices. UC Cooperative Extension, County Agricultural Commissioners, Resource Conservation Districts, and the Natural Resource Conservation Service are consistently engaged with the agricultural community in providing conservation and water quality assistance. We believe that a full exemption could actually result in additional investment in maintaining water quality. The resources, both financial and human, that are currently dedicated to monitoring and fees could, instead, be focused on increased management.

The required ILRP watershed monitoring over the past two decades has indicated basically no impact to water quality related to local farming practices. The County believes the degree of regulation imposed on our agricultural constituents should approximate the actual risk that is associated with their practices. That risk, given the management practiced by our producers and validated by the years of monitoring, is essentially zero. Consequently, a full exemption is warranted and well deserved. The County strongly encourages the granting of this exemption.

Sincerely,



Ned Coe
Chair of the Board