



February 4, 2025

Mr. Mark Bradford
Chairman, Central Valley Regional Water Quality Control Board

RE: Upper Pit River Watershed

Dear Mr. Bradford,

We are writing in support of a full exemption from the Irrigated Lands Regulatory Program for the Upper Pit River Watershed.

Agriculture in the Upper Pit watershed is dominated by pasture and hay crops. Due to the long-term stability and minimal inputs the potential impact to water quality from these crops to water quality is very low. The small acreages of other crop types that exist in the area are typically grown at a relatively small scale. Local growers work closely with technical providers such as NRCS, County Agriculture Commissioners, UC Cooperative Extension, support from local conservation organizations, most notably the Modoc Resource Conservation District (RCD). The RCD covers all of the South Fork of the Pit River and the mainstem of the Pit and its tributaries downstream to the Canby Bridge on state Hwy 299.

Exemption from the Irrigated Lands Program is warranted by evidence of long-term water quality monitoring data as well as the agricultural systems in place. The Modoc RCD works actively with growers to implement a wide range of best management practices that support conservation of resource values including water quality. As a program that was primarily designed and targeted to the Sacramento Valley floor, implementation of the ILRP has shifted local concepts of agricultural water quality into a context of regulatory compliance and fees, while contributing almost very little to on the ground management. As local leaders in conservation we actively promote "water quality" as a widely shared resource value, that is also widely supported in practice.

You may remember Modoc RCD organized a tour of the Upper Pit River for the Water Quality Control Board in 2019. The Modoc RCD has a long history of working with growers and other support agencies and organizations to achieve water and resource conservation. We look forward to continuing to serve that role and we believe an exemption to the IRLP would best serve our community, local resources and our mission.

Thank you for considering our request.

Sincerely,

Lani L Cockrell

Lani Cockrell

Executive Director

Modoc Resource Conservation District

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