

*County of Lassen*  
**ADMINISTRATIVE SERVICES**

---



**MIKE SCANLAN**

*District 1*

**GARY BRIDGES**

*District 2*

**TOM NEELY**

*District 3*

**AARON ALBAUGH**

*District 4*

**JASON INGRAM**

*District 5*

**Tony Shaw**

*County Administrative Officer*  
email: [coadmin@co.lassen.ca.us](mailto:coadmin@co.lassen.ca.us)

County Administration Office  
221 S. Roop Street, Suite 4  
Susanville, CA 96130  
Phone: 530-251-8333  
Fax: 530-251-2663

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

RE: Upper Pit River Watershed

Dear Mr. Bradford,

Thank you for the opportunity to comment and express our strong support for a full exemption from the Irrigated Lands Regulatory Program (ILRP) for the Upper Pit River Watershed.

Agriculture in the upper Pit River watershed consists of primarily pasture, forage crops; a small percentage consists of wild rice, which is grown where soils naturally promote ponding of water. Crop selection is constrained by the short growing season with barely a 100-day frost free growing season. Agriculture differs significantly from the central valley in that forage cropping systems are stable, long-term and provide essentially constant ground cover. Similarly, the relatively low-profit margin associated with such crops also limits management inputs to a minimum. Importantly, irrigated forage crops, while strategically part of the overall agricultural system make up only a relative fraction of the Upper Pit landscape, which is predominantly range and forest land.

It is not surprising that water quality monitoring in the watershed over the past 20+ years indicates virtual absence of water quality pollutants due to agricultural practices.

Given the low impact nature of the agricultural systems, 20 years of water quality monitoring, the relatively low per acre value of our crops, it is clear that the Irrigated Lands Regulatory Program imposes a disproportionate level of hardship on the growers in Lassen County as well as the rest of the Upper Pit River watershed. In fact, the ILRP was never an appropriate tool for agriculture in the upper watershed. Conversely, ILRP exemption will result in more dollars invested on the ground instead of into state fees. ILRP exemption will provide a local incentive to maintain water quality and proactively avoid watershed regulation in the future.

Sincerely,

Tom Neely, Chairman  
Lassen County Board of Supervisors