

## SHASTA COUNTY CATTLEMEN'S ASSOCIATION

P.O. BOX 492401

REDDING, CALIFORNIA 96049-2401

September 16, 2010

Ms. Megan Smith  
630K Street, Suite 400  
Sacramento, Ca 95814  
[ILRPcomments@icfi.com](mailto:ILRPcomments@icfi.com)

Dear Ms. Smith,

The Shasta County Cattlemen's Association has reviewed the PEIR for the Long Term Irrigated Lands Regulatory Program. Members have attended scoping meetings as well as the Public Meeting in Chico. Based on the review and the meetings, we offer the following comments.

We are glad that the Water Quality Staff has been listening to the agriculture industry's concerns regarding the costs of continued monitoring of the waters for contamination. The Shasta County Cattlemen have supported water quality and have in fact had tests conducted for e-coli and D.O. prior to the implementation of the current ILRP. A number of our members have installed catch basins or done other improvements to limit any runoff from irrigation directly into the streams.

Although there are some statements in the PEIR indicating that the waters are continuing to be degraded by agriculture operations ( Section 3.7.1, page 3-29), we do not believe that to be true, particularly in Shasta County. As stated previously, our members have instituted management practices without any requirements and it would be expected that they will continue to do so without any monitoring program. In addition, in the past 5 years of testing, except for e-coli and DO, no contaminants have been found in Shasta County. The test conducted by UC Davis determined that the e-coli detected were not from agriculture sources. The DO can easily be explained because the tested streams have minimal to no flow during the late spring and summer months, thus DO is naturally going to be low.

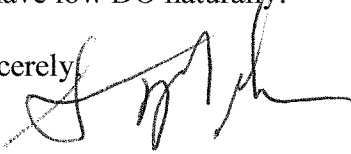
Based upon studies conducted by the Shasta County Cattlemen's Association and the work that agriculture producers have done to enhance the waters in Shasta County, we do not believe a monitoring program is warranted.

If there is going to be a continued requirements for monitoring, then the Shasta County Cattlemen's Association embraces the Staff Recommended Alternative in the PEIR. The one exception that we do not believe is warranted in the Staff Recommended Alternative or any of the other alternatives is for ground water testing in the foothills, as there are no identified water basins, nor any basis that any of the water is contaminated by agriculture operations. Most of our members have well or spring water so they are naturally concerned about their own drinking water safety. If the surface waters do not show contamination, it would be less likely that any ground water would be contaminated, as there is little leaching in those areas.

In reality, it would take the testing of hundreds of wells to get any idea of contamination. Trying to determine its source would be extremely difficult.

We understand that during the development of the orders, that ground water could be eliminated as a needed test for geographic areas such as the foothills where there are no ground water basins. In addition, during the development of the orders, we believe that testing for e-coli and DO needs to be eliminated until a better protocol is developed to determine the source of the e-coli and streams need to be evaluated as to their tendencies to have low DO naturally.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Moller', written over a horizontal line.

Steve Moller, President  
Shasta County Cattlemen's Association

