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June 25, 1998

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David L. Orth, General Manager
Westlands Water District
P.O. Box 6056,
Fresno, Ca 93703

Subject: Land Reversion Option

Dear Mr. Orth:

I wholeheartedly support, as you do, the concept of land reversion in lieu of land retirement for the following reasons:
keeping land on tax rolls
less impacts to the economy
more friendly to wildlife
no impacts to the restoration fund

I would ask your indulgence as I use an extended narrative to propose yet another option to implement a system of temporary land retirement which may have specific applications to keep land mainly under cultivation while conservative of water.

I am borrowing this general concept from the world's premier instruction manual. In it, one Joseph Jacobson, a mideast governmental consultant generaly known for his sartorial splendor, proposed that the client country be subdivided into operational districts and farmed for but seven years; following this time, there would be fallowing to allow for water shortages.
This principal may not have the following it once had, due to the facts of Joseph's nepotism practices and that a successor, named Moses, had an autonomy disagreement with the government. To cause a paradigm shift, he performed some environmentaly unsound activities with frogs, locusts, snakes etc.and including some severe non-point source pollution of the Nile and negative primogenitor impacts. It ought to be remembered, however, that these were performed without the issuance of an Environmental Impact Statement.
In post-biblical times, the fallowing concept was used in the USDA soil bank program, but it was driven mainly by market surpluses. I have seen possibilities in the fallowing principle following a serendipidous occurrance.

I have been interested in the fact that most urban water use goes to landscaping and that a switch to native perennial grasses would decrease urban demand to more than make up for water transfers for environmental and other uses. S&S Seeds is developing cultivars of salt grass, which I felt would be an appropriate turf for the Inland Empire and other desert areas of the state. The company's R&D botanist mentioned that not only does this grass love salt, but also it volitalizes selenium. This gives rise to the following proposal, which could be used with other various methods of bioremediation of soils, but is mainly proposed for proactive soil maintenance:

Acreage would be divided into specific areas to be fallowed rotationally on an annual basis. This fallowed acreage would be cover cropped with salt grass. This grass could be prescribed as a mix with other halophytes or legumes.

The following factors and facets should be considered:
o Fallowing is proposed for annual commodities only.
o Total water use would be less, not only because of the fallowed area, but also because of less need for soil flushing.

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o The actual percentage of land retired and the duration between fallowing return would be agronomically determined for the specific area.
o Water quality could improve as chemical amendments are replaced by organic return.
o Safe Harbor would have to be initiated. This fallowing regimen could be an acceptable reason for its enactment. Fallowed lands would abut the next fallowed area, so that impacts on wildlife could be minimized. Eviction is more politically and biologicaly palatable than extinction. Dispossesed kit foxes pushing miniature shopping carts annualy from field to field, presents a better, if ludicrous, mental picture to the public and officials than that of the current reality of cultivation and no habitat. There may have to be a period, probably in the winter, when both fields have some habitat.
o Then, rotational fallowing could be approved, hopefully, as part of the Bay-Delta's habitat conservation plan.
o This concept could be applied for both individual landowners or cooperatively through multiple owners through co-ordination efforts of either a resource or water district.
o What becomes of the saved water, either transferred to environmental or acquifer uses, sold/banked or credited to future entitlements, should also possess options. Aquifer replenishment would seem the best method of assurance for drought.
o The proposal would coincide with proposals to mechanicaly remove accreted sand from the San Joaquin and incorporate it in clay soils to restore the river while concurrently offsetting perch problems.
o It could be used with remediated soils, including those purchased and alleviated by the government. Perhaps this situation could be where testing and modeling begins. The proposal's primary aim though, is to diminish government purchases for retirement, so a conflict of interest may exist.
o This fallowing may have possibilities for incorporation with other farm fallowing programs such as CRP or WRP.
o Pastoral uses may occur on the fallowed lands.

The object of the proposal is to actually maintain or increase ag production over the long term consistent with a lessening of water demand and environmental degradation. I am not proposing this as a panacea, but as a tool to be added to the menu of options available to the local level. This would allow more diversity to the local situation and encourage more landowner participation. At this time, I feel it would be best for your District to only contact those technically knowledgeable employees of the State or University, the seed supplier etc., discuss the proposal's feaseability with them, and, maybe, set out a few test plots.

Sincerely,

Dennis Fox
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