



Dennis F. Bray
Agricultural Commissioner
Sealer Of Weights And Measures

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**KINGS COUNTY DEPARTMENT OF
AGRICULTURAL COMMISSIONER
SEALER OF WEIGHTS AND MEASURES**

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Cal-Fed Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, California 95814

June 9, 1998

Re: Comments on draft programmatic EIS/EIR

Growers in this area of the San Joaquin Valley have a number of specific concerns about Cal-Fed's proposals.

At the same time Cal-Fed works to solve environmental problems in the bay-delta region, it must be assured the needs of growers, industry, and urban/rural residents are met. Cal-Fed's solutions should increase, as well as make more reliable, water supplies and improve water quality.

Increasing water storage both above and below the delta is vital. This is important in terms of having the ability to store water in "wet" years to be available for use in "dry" years, as well as providing much-needed flood protection. In 1997, Kings County's gross value of agricultural products was nearly \$870 million. Currently, with nearly 32,000 acres of land flooded due to excessive rainfall/run-off, the lack of sufficient storage is having a significant economical impact on our county. This loss of valuable farm land may lead to a loss of over \$100 million in agricultural-related income in Kings County alone.

A more reliable water supply would assist the growers in the San Joaquin Valley in preventing groundwater over-draft by assuring surface water availability in "dry" years. Additional agricultural water should not be reallocated for any reason.

Although recognizing that new water development will require some land be taken out of agricultural production, prudent decisions are essential to ensure prime farmland is not impacted.

In a county such as Kings, the cumulative impact of land retirement would be economically detrimental to our small communities, already suffering from a higher than average unemployment rate. In turn, the loss of tax revenue from this converted land would impact the county as a whole.

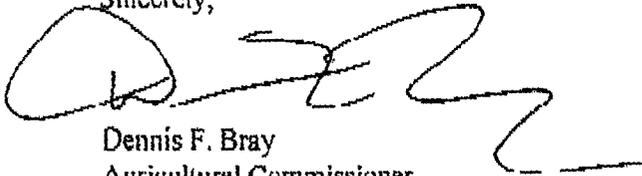
The cost of environmental enhancement and mitigation needs to be brought to the public at large, not resting solely on the backs of the farmers. As a whole farmers are already acting as good stewards of their land and should not be heavily burdened financially when they have been acting responsibly, based on past/present administrative policies.

Any future water plan must include improving the flow patterns of the delta to help alleviate the existing water shortage.

Decision makers must recognize that water transfers are a short-term solution at best, and can't be depended on from year to year, especially in years of high demand and low availability. The uncertainty of agricultural water availability on a year to year basis due to C.V.P.I.A. should be addressed in any plan forthcoming.

The San Joaquin Valley is acknowledged world-wide as a leader in production agriculture. The decisions made today should guarantee its future, as we look to balance the needs of the environment with the needs of the agricultural community, as well as the people of California.

Sincerely,



Dennis F. Bray
Agricultural Commissioner
Sealer of Weights and Measures
County of Kings

cc: Kings County Board of Supervisors
Jim Verboon, California Farm Bureau District Director
David Kennedy, Director, Department of Water Resources ✓
Dennis Pooler, CACASA Natural Resources Protection Committee
A.J. Yates, Undersecretary, California Department of Food and Agriculture