



**BUTTE
COUNTY
FARM BUREAU**

Serving Agriculture For More Than 80 Years

01192

JUN 15 1998

June 10, 1998

CALFED Bay-Delta Program
1416 Ninth St., Suite 1155
Sacramento, CA 95814

Re: Comments on draft programmatic EIS/EIR

Butte County Farm Bureau, who's nearly 2,000 members produce the food and fiber which supports the economies of Butte County and the state of California, has a number of specific concerns about CALFED proposals and the alternatives which are under consideration. We support the CALFED process and your efforts in solving environmental and water supply reliability and water quality problems in the Bay-Delta region. We recognize that this complex process attempts to satisfy environmental goals, the needs of California's farmers, and the demands of industries and urban residence all at the same time.

The Butte County Farm Bureau believes there are several important items which must be included in this plan to insure its success.

New water storage must be a critical part of the ag solution as well as the environmental solution. The pressures of California's rapidly increasing population demand that the state enlarge its available water supply. Thirty year projections predict population increases of 20 million more Californians, 55 million more US citizens and two billion more people world wide. We can't meet the needs of both the environment and the rapidly increasing population without significant new water storage. Without new surface storage, creating "new water supply", the ability of agriculture to produce ample commodities in Butte County, and in the rest of the state, will be severely curtailed. Without new surface storage, local environmental needs will not be met when water is reallocated from Butte County's aquifer for environmental uses in the Bay-Delta. Butte County needs to be assured by CALFED that all components of the program elements will be allowed to move forward together. Since the construction of a new storage facility will take many years to complete, the studies and permitting process must begin immediately. It is evident that the present supply of available water is inadequate to supply future predicted demand--we can not afford to react to an inevitable water shortage crisis, we must plan now to avoid it.

Conservation alone can not solve the water supply problems of the Bay-Delta. By the very nature of business, good water conservation is part of the farmers profit margin. With the cost of water, be it surface water or ground water, it is in the farmers best interest to conserve. Conservation efforts include new irrigation techniques, new low pressure sprinklers including drip systems and micro-sprinklers, conversion of flood irrigation to piped mainlines, field retention of rice irrigation water for water quality purposes, installation of closed systems to recycle drain waters, soil moisture monitoring to pinpoint volume and timing of irrigation applications, shorter stature rice varieties requiring less water for the same production, and many more. All the previous examples are forms of conservation that show agriculture has been actively attempting to conserve available water, but with little recognition. CALFED must acknowledge agriculture's water conservation efforts and realize the benefits created for fish and fowl by agriculture's artificial wetlands and diversified habitats. Agricultural conservation is not the answer to the state's water supply deficiencies.

CALFED must not diminish water rights and must assure water-rights holders their rights will be protected and even strengthened. The government's long-standing promise to protect area of origin water rights must be honored. CALFED must not base its solutions on redirection of agricultural water and conversion of farmland. Conversion of land and water generally violates the solution principles of CALFED. It does not reduce conflicts, it is not affordable when the economic viability of rural counties is considered and it redirects significant impacts to a third party position. CALFED must consider the overall ripple effect of the economic benefits derived from the agricultural use of water.

As water-rights holders should be protected, CALFED must guarantee that groundwater users rights will be protected and strengthened as well. Thousands of acres of productive farmland in Butte County is serviced by groundwater only. A full study of possible third party impacts resulting from water transfer and conjunctive use programs must be included in assurances packages before transfers can be considered as a viable partial solution to Bay-Delta problems. Protection of Butte County ground water users including urban and domestic wells, will aid in the process of moving CALFED toward its ultimate goal.

An additional point is the idea of a meandering river. All the way up and down the Sacramento River we have vital infrastructure; bridges, towns, levees, flood relief structures, pumping plants, fish screens, and roads. These all need to be maintained and protected from the meandering river. Prior to the river threatening this infrastructure it needs to be controlled. We can't wait until a disaster has happened prior to taking action because at that point it is too late.

Support by Butte County Farm Bureau of the new Watershed Management Program, hinges on the effect it has on production agriculture. We strongly believe this program should emphasize cooperation between affected landowners and governmental agencies. The health of local watersheds is instrumental to the success of CALFED's Common Elements of Ecosystem Restoration, Water Quality, Water Supply Reliability, and Levee System Integrity, but farmers must be allowed to continue to farm in historical and traditional manners. Participation in watershed management must be on a voluntary basis, and as with water transfers, impacts to surrounding landowners must be considered before moving forward with proposed projects.

Butte County Farm Bureau supports your efforts to find a long term solution to the water problems of the Delta, but we won't accept alternatives that do not benefit agriculture in our region and the state. We believe that the creation of new water storage and the preservation of existing water rights, protection of groundwater rights, analysis of third party impacts and voluntary participation in watershed projects needs to be an integral part of your final program.

Sincerely,



David Skinner
Chairman Water Committee



Lewis Johnson
President

cc: Congressman Wally Herger
Governor Pete Wilson
Bill Pauli, President California Farm Bureau

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DEPARTMENT OF
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SACRAMENTO

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