



Solano County Farm Bureau

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

Attn: Mr. Rick Breitenbach

Re: Addendum to Solano County Letter dated June 29, 1998 from Paul Lum,
Water Chairman

Dear Mr. Breitenbach:

These are additional comments on the March 1998 Draft of the CALFED Bay-Delta Program Programmatic Environmental Impact Statement /Environmental Impact Report.

1. Given the extent and complexity of the program, the comment period has been exceedingly short, even with the extension. The short comment period has placed an undue burden on those who may have wished to comment.
2. The geographic analytic framework of the draft EIR/EIS places an extreme burden on local jurisdictions to assess programmatic impacts within areas under their responsibility. Breaking down programmatic impact areas into three broad regions: Delta, Sacramento, and San Joaquin. These large breakdowns mask important and significant impacts. Economic impacts on say, Solano county are likely to be different than those on Yolo. The impacts on the city of Sacramento will be different than those on Rio Vista. Impacts need to be addressed in terms of easily defined jurisdictions, at least counties, rather than larger vaguely defined geographic or biological regions.
3. The term "Environmental Restoration" is not clearly defined. Restored to what? -1950 conditions? 1900 conditions? 1720 conditions? Because the term is vaguely defined it should not be used since no clear environmental impacts can be defined except in specific terms of specific species. Invasions of exotic organisms, climate change, and geologic and hydrologic changes wrought by man and nature have made "restoration of habitat" an impossibility.

The EIR must then set out specific goals of the program. The notion of "adaptive management" leaves goals and objectives so open to continuing modification that farmers affected by the program would be faced with a situation of perpetual uncertainty. For example, if anadromous fish achieve some acceptable level of population, then do administrators have the option to tell those who already modified their farming practices to achieve that goal that now there is a new objective to restore native bees and that now practices involving honey bees must be changed (apis mellifera is an exotic species)?

It is a serious flaw of the EIS/EIR that the goals and objectives of land conversions to non-cultivated environmental purposes are so vaguely defined as to not permit an adequate assessment of impacts.

Without well defined goals and objectives, it is not possible for the EIR/EIS to allow the CALFED program the possibility to provide farmers with the necessary assurances of freedom from undue interference in farming practices to allow the program to proceed.

4. The economic impact analysis falls short in several regards. By folding in economic impacts in a large diverse region, the serious impacts are concealed. Certainly the removal of 64,000 acres of agricultural land in Solano County will have a major impact on farmgate production there. But the agricultural infrastructure of Solano transports and processes product from within the entire delta region. Reductions in tomato harvests will likely adversely affect the tomato processing plant in Dixon. Reductions in wheat and corn will adversely impact supplies for General Mills in Vallejo. Will reduced ag production in the Delta make dredging the channels less important for the maintenance of access to the Ports of Sacramento and Stockton, both of which serve Solano farmers?

The EIS/EIR does not adequately address the economic impact of the proposed massive land conversions on all components of the agricultural economy - production, processing, transportation and marketing - within the regional economy. Rather, very serious impacts are masked by lumping impacts together with all the economic sectors in an economically diverse region.

Agricultural production and processing provides at least 50% of the industrial base of Solano county. The EIR must contain a complete analysis of the economic impacts, including stresses on processing and infrastructure, of the program on this county.

Indeed a county by county impact analysis should be provided.

5. The draft EIR/EIS makes very clear that the problem area being addressed by the CALFED program is that of the statutory Delta, but that the solution encompasses almost the entire state. It is entirely feasible to believe that as California's population increases and without additional surface storage in the state, both ground water from Solano County and water from Lake Berryessa will be necessary to maintain water quality in the Delta. Furthermore linkage between Putah Creek and Delta environments may be a factor in strategies to increase in fish and wildlife populations. A complete and thorough impact analysis of the ongoing program on these Solano resources and additional secondary impacts on agriculture in Solano and Yolo counties should these resources be sequestered are an important necessity for an adequate programmatic EIR/EIS.