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July 1, 1998

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Mr. Lester Snow
CALFED Bay-Delta Program
1416 9th Street, Room 1155
Sacramento, CA 95814

RE: Comments on programmatic EIS/EIR

Dear Mr. Snow:

On behalf of the California Rice Industry Association, thank you for the opportunity to comment on the CALFED Bay-Delta Program's "Draft Programmatic Environmental Impact Statement/Environmental Impact Report" (PEIS/EIR). We would like to commend your staff on the work completed to date and we hope you find the following statements helpful.

The California Rice Industry Association is a non-profit organization representing millers and marketers of California rice. Our members represent a significant majority of the California rice crop, cultivated annually across about half a million acres of the Sacramento Valley. Our group is dedicated to sustaining profitable rice farming in California, while educating regulators and the public about the environmental and economic benefits of rice cultivation.

We are sure you will receive many comments in response to the PEIS/EIR. In the interest of clarity and brevity, we have chosen not to provide detailed comments on many issues raised in the PEIS/EIR that are of general interest to Northern California agriculture. Instead, we would simply note that we have reviewed, concur with and support those comments submitted to you by the Northern California Water Association (NCWA), whose member districts encompass virtually all of California's rice growing area.

In particular, before adding our own comments, we would underscore our support for four points made by our colleagues at NCWA.

- The PEIS/EIR does not contain enough programmatic detail to support a responsible selection of a preferred alternative, nor a thorough analysis of the common program elements,
- The plan seems largely and substantially focused on improving drinking water supplies for urban areas and exports to south-of-Delta interests, and (varying by alternatives) on flow-related improvements designed to reduce fish kills in the Delta; however, there appears to be little emphasis on increased storage or other items that would benefit the rice industry. In other words, we see a



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package of solutions for Delta exporters that appear likely to come at the cost of Northern California, without much offered in return – no matter which preferred alternative is chosen.

- The PEIS/EIR appears to rely heavily on conservation and water transfers that could be harmful to agriculture, a fact worsened by an apparent lack of commitment to increased storage options, and
- It is critical that in evaluating the PEIS/EIR options, great care be given to consider the environmental impacts of any options that would reduce rice acreage or rice water supplies. NCWA specifically mentions the need to maintain efforts to preserve the Giant Garter Snake; while this is indeed a critical issue, it should be noted that about 30 threatened and endangered species depend on Northern California rice fields for habitat. Actions that negatively affect rice acreage or water supplies will certainly negatively affect habitat for these creatures. The PEIS/EIR has not carefully considered the potential impacts of water conservation and land retirement measures.

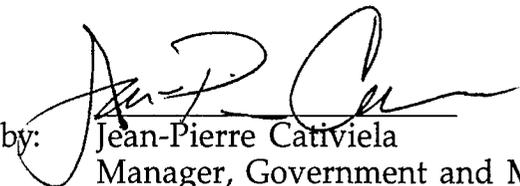
In addition to the above statements, we'd like to add the eight points in the area of CALFED's Water Quality Program as discussed in the enclosed attachment.

To summarize, the PEIS/EIR clearly outlines the prospect and promise of dramatic potential benefits for California water users, particularly in the areas of voluntary and incentive-based programs. However, much work needs to be done to assure that the phenomenal amount of resources necessary to accomplish CALFED objectives will be directed wisely and appropriately.

Again, we appreciate the opportunity to comment on this document, and look forward to continued involvement in the CALFED process.

Sincerely,

CALIFORNIA RICE INDUSTRY ASSOCIATION


by: Jean-Pierre Cativiela
Manager, Government and Member Affairs

attachment