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• GROWERS AND SHIPPERS OF QUALITY FRUITS & VEGETABLES •

June 30, 1998

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

re: Draft programmatic EIS/EIR - public comment

Ladies and Gentlemen:

The Cal-Fed process began with a commitment to develop consensus between the major constituencies affected by Bay-Delta issues: agriculture, wildlife, fisheries, other industries, and residential / municipal users. In reality, **it appears that agriculture has been under-represented and given a secondary focus, both in the formative process and in the proposed solutions.** This structural imbalance has led to fundamental weaknesses in the proposed approaches, and made many in agriculture wary that this process may become another one-sided weakening of agriculture's interests. We remember the Central Valley Project Improvement Act.

The solutions identified are too weak in their commitment to develop significant new water storage. The constituencies opposed to new water storage have brought a great disservice to California by bringing about a disproportionate focus on their viewpoints and dominating the interests of others. All of the following will benefit from more storage: A steadily growing (thirsty) state population; Communities needing greater protection from flood risks; Wildlife and fisheries interests who will benefit from greater and more stable river flows; All the employees, merchants, communities and farms who will benefit from more abundant and reliable agricultural water sources.

Do not underestimate the importance of reliability for agricultural water supplies. For example, solutions need to be found to keep agricultural waters flowing south from the Delta even when critical fish migration events are in progress.

The solutions identified do not adequately address who will pay the costs for delta improvements and water supplies. These projects have wide impacts, many proponents and numerous benefactors. The costs must be shared fairly with all those desiring and benefiting from them.

The solutions identified place an over-reliance on land retirement within agriculture. I urge all Cal-Fed participants to begin looking at agricultural land as the tremendous asset it is, rather than as a liability. Retiring agricultural land withdraws a enormous source of economic power from our state and communities. I urge any who doubt this to study what happened to communities surrounded by land that received only a 25% water allotment during the last drought. I work daily along side the

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farmworkers and merchants supported by our farming. I am very concerned that the proposed solutions grossly underestimate the lost opportunities, hardships, and dislocation of people that land retirement will bring.

The solutions identified place an over-reliance on water conservation within agriculture. Farmers have already accomplished much in the area of conservation because of previous incentives (e.g. limited supplies, increased water costs [that often include environmental assessments], the need to reduce drainage flows, etc.). As a grower with over 1,600 acres of drip irrigated vegetables, I want to emphasize that the "easy" gains in water due to conservation are largely over. Further, I urge you not to over-value some of the sources of conserved water. For example, water that percolates below a crop's root zone often beneficially recharges vital groundwater supplies. Further, a study of world history demands the conclusion that irrigated agriculture requires a leaching fraction¹ to be sustainable.

The Cal-Fed Bay-Delta Program is a great concept with tremendous potential for statewide benefits. Wanting the process to succeed, I urge a more thorough consideration of the needs of California agriculture (specifically the farmers of the San Joaquin Valley), as well as the numerous constituencies who reap the benefits when agriculture thrives. The San Joaquin Valley is an unequalled resource of quality soils, an arid climate with a long growing season, uniquely coupled with abundant and nearby watersheds. If agriculture is anything less than a full partner in this process, the result will be tragic and irreparable, to the detriment of all the citizens of our great state.

Very truly yours,



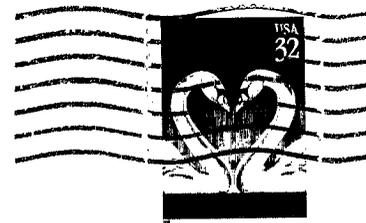
Kevil Quinley
Farm Manager - Vegetable Division

¹ The leaching fraction is the amount of irrigation water applied in excess of crop water demand that is necessary to keep the soil salinity from rising. Rising soil salinity reduces crop yields and quality, and eventually brings about soil sterility.



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