

DEPARTMENT OF FOOD AND AGRICULTURE

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**BY FACSIMILE**

November 26, 1997

Jim Branham, Undersecretary
California State Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

Dear Jim:

Thank you for giving the Department the opportunity to comment on the draft "briefing on water issues." The draft provides a very thorough summary of the current status of water issues in the state. The Department offers the following comments concerning the draft.

I. Fix the Bay-Delta**Program EIR/EIS**

Second Paragraph. It should be highlighted that the draft EIR/EIS is unique in the treatment of the common program elements. The lack of evaluation of alternatives to common program elements leaves an appearance of disregard to potential impacts of the common program elements. It would be helpful to include a brief statement on the pros and cons of this strategy, i.e. the lack of consideration of alternatives for each of the common program elements.

Fourth Paragraph. To satisfy agricultural stakeholders, the HCP will also need to include specifics concerning potential impacts and mitigation.

II. Build Additional Off-Stream Storage

Fourth Paragraph. The last sentence contains an opinion attributed to Fish and Wildlife Service and some stakeholders that the Los Banos Grandes facility is "unbuildable due to 'unmitigable' environmental impacts." This sentence should be edited to emphasis that "unbuildable" is opinion not a conclusion based on a documented environmental data or review.

IV. Promote Water Marketing and Transfers

First Paragraph. The California Farm Bureau has a strong policy opposing long-term water transfers; they are not oppose to short-term water transfers.

V. Provide Adequate Protection for Fish and Wildlife

First Paragraph. It would be helpful to detail federal vs. state dollar contributions to this section.

Third Paragraph. Include a brief statement on the science panel's general conclusion concerning ERRP. Also, highlight that a major component of the ERRP is land acquisition that will impact agriculture in the Delta.

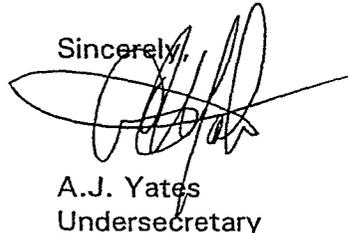
Recommendations. It is premature to advise the Governor to use the ERRP as an example of, highlight accomplishments in the area of ecosystem restoration. The ERRP remains very controversial and contains no guarantee of success based on the review of the science panel.

Additional Issues

Flood Emergency Action Team and Flood Management Force

Recommendations. The agricultural community remains concerned about the consequences on "willing seller" land acquisitions; especially environmental requirements when the government becomes a new neighbor. Also it should be noted that all Category III flood management solutions are structural; i.e. levee setbacks. The use of non-structural flood management solutions will prevent the loss of valuable agricultural lands and preserve their valuable contribution to local and state economies.

Sincerely,



A.J. Yates
Undersecretary