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A number of comments were received which indicated that the Program should not use any lands currently in agricultural production for Program purposes. The CALFED Program, based on input and advice from scientists and stakeholders, has developed objectives for ecosystem restoration that include targets for habitat restoration that are amounts of land that are required to ensure sustainable populations of species in the Bay/Delta system. Because much of the land in the Delta and along major Central Valley stream corridors is currently in agricultural use, some of these lands may be needed for ecosystem restoration purposes. Other portions of the Program, including Conveyance and Storage, may also require facilities in areas that are currently in agricultural use. The Programmatic EIS/EIR acknowledges that the conversion of agricultural lands to Program purposes is a significant environmental impact. Section 7.1.11 of the Programmatic EIS/EIR (Agricultural Land and Water Use- Mitigation Strategies) contains a number of mitigation strategies that are designed to minimize the acres of agriculture that are converted to Program uses, including:

- Focusing habitat restoration efforts on developing new habitat on public lands before converting agricultural land;
- Restoring existing degraded habitat as a priority before converting agricultural land;
- Using farmer-initiated and developed restoration and conservation projects as a means of reaching Program goals;
- Siting and aligning Program features to avoid or minimize impacts on agriculture.

Some program goals may be met without taking agricultural lands out of production, such as flooding croplands in the winter to provide seasonal wetlands, or acquiring easements for agricultural practices which benefit wildlife. Should agricultural lands still be required after considering the avoidance mitigation strategies, the Program also proposes to acquire land only from willing sellers, so that individual farmers are not unfairly impacted. Other strategies in Section 7.1.11 of the EIS/EIR provide methods to partially mitigate any conversion of agricultural land which does take place, such as: "Supporting the Agricultural Land Stewardship Program in acquiring easements on agricultural land in order to prevent its conversion to urbanized uses and increase farm viability". Given the location of agricultural lands in the state, the Program could not be successful without some conversion of agricultural lands to Program purposes.

Comments were received from a number of respondents who indicated that the Program should not acquire lands for government ownership which would reduce the tax base of local governments and special districts. The Program contains a number of strategies to avoid impacting the local tax base. Some program goals may be met without purchasing agricultural lands, such as flooding croplands on a voluntary basis in the winter to provide seasonal wetlands. Also, the Program may purchase conservation easements that allow farming to continue. Mitigation strategies included in Section 7.1.11 of the EIS/EIR include involving local governments and citizens in developing appropriate configurations for Program projects, which could include configurations to maximize retention of the tax base. Section 7.10 (Regional Economics) acknowledges that local government finances could be negatively affected by the Program.

Several comments were received which discussed the state's agricultural economy and potential impacts which could result from Program actions. Section 7.2 of the document discusses potential effects of the Program on the agricultural economy. Included are the value of California's agricultural economy, and worst-case analyses of how it could be affected. Specifically, conversions of agricultural lands to Program purposes, including storage, conveyance, ecosystem restoration, water transfers and water quality could reduce agricultural production. With all of these program areas, the landowner would not suffer financially, as market values must be paid for easements, land and water. However, sectors of the economy which provide services to agriculture, such as trucking firms, custom harvesters and equipment companies, could be affected. These sectors are "economic multipliers" generated by agricultural production. Section 7.2 discusses potential reductions to agricultural production, and effects on other sectors which could also be affected negatively when crop production declines. Section 7.3 discusses effects to farm employees and workers, and their communities, if agricultural production declines.

Comments were received from several individuals and groups indicating that water should be guaranteed to agriculture by CALFED. One of the stated purposes of the CALFED Program is to improve water supply reliability to all users of Bay-Delta water. Given the variability in California's climate, the many sources used for irrigation water and the wide variances in cost and willingness-to-pay, CALFED cannot "guarantee" a set amount of water to agriculture in general, or to any other sector. Also, there are no firm numbers to account for how much water is used for agriculture in the state. Most agricultural water sources are not metered, so that determining agricultural uses is a matter of estimation. The end use of water is normally within the discretion of an individual user or water district. It is unclear to whom water for agriculture would need to be guaranteed, or how a requirement to use the water for agriculture could be enforced. No governmental mechanism exists to control the end uses of water, and no means to track the end use of all water exists. CALFED has proposed programs which will, if fully implemented, result in more-reliable water supplies to users. These include: the Multi-Species Conservation Strategy, to avoid future endangered species listings and attendant water diversions; the Levees Program, designed to avoid catastrophic levee failure in the Delta, and resulting interruptions in water delivery; and the Storage program, which will investigate the feasibility of adding storage to meet identified water needs. It would be infeasible and outside the scope of the Program, however, to state that a certain number of acre-feet of water are guaranteed to agriculture statewide.