



## Memorandum

Date: April 9, 1999

To: Mary Nichols, Secretary for Resources  
Bill Lyons, Secretary for Food and Agriculture

From: Lester A. Snow  
Executive Director

Subject: CALFED Agricultural Mitigations

As CALFED prepares an agency review draft of the Programmatic EIS/EIR, we need to deal with issues related to mitigation for agricultural land impacts. I want to be sure that CALFED's Programmatic EIS/EIR is consistent with State agricultural mitigation policy, and that questions related to such State policy decisions are discussed and approved in more appropriate forums.

CALFED should seek to avoid or mitigate, to the extent possible, any significant environmental impacts which it causes, as required by the California Environmental Quality Act (CEQA) and the National Environmental Quality Act (NEPA). Because CALFED is a major undertaking, that may impact a large amount of agricultural land over its lifetime, it is an easy target for those who seek new agricultural mitigation policies. However, the entire CALFED Program, in a worst-case scenario, would convert less than 15% of the acreage forecast to be converted by urbanization over the same time period. As such, I do not want new agricultural land policy to evolve in CALFED and be the "tail wagging the dog."

Local governments, which approve this level of agricultural land conversion to urban uses, have a much greater effect on loss of agricultural lands. If we as a state are going to reduce the negative impacts of agricultural land conversion, these local government entities need to be partners in the solution. The issue of agricultural land conversion seems ripe for evaluation under "smart growth" or statewide growth management discussions. While conversions to habitat purposes, including CALFED ecosystem restoration plans, will contribute to the cumulative loss of farmlands, they should neither be discussed nor mitigated in isolation from other causes of farmland conversion.

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**CALFED Agencies**

**California** The Resources Agency  
Department of Fish and Game  
Department of Water Resources  
California Environmental Protection Agency  
State Water Resources Control Board

**Federal** Environmental Protection Agency  
Department of the Interior  
Fish and Wildlife Service  
Bureau of Reclamation  
U.S. Army Corps of Engineers

Department of Agriculture  
Natural Resources Conservation Service  
Department of Commerce  
National Marine Fisheries Service

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Currently CALFED Programatic EIS/EIR identifies mitigations for agricultural land impacts at the same level as those used by other governmental agencies, and as considered standard under CEQA and NEPA.

Since there has been pressure for CALFED to "pioneer" agricultural land mitigation policy, I believe it is important that we schedule a meeting for the identification of the issues and the State policy direction. I will follow up with your offices to find a suitable time.