

## DEPARTMENT OF FOOD AND AGRICULTURE



1220 N Street  
Sacramento, California 95814  
May 9, 1996

Mr. Lester Snow  
Executive Director  
CALFED Bay-Delta Program  
1416 Ninth Street, Suite 1155  
Sacramento, California 95814

Dear *Lester* Mr. Snow:

Thank you for maintaining an open process for developing a long-term solution to the water quality and water supply issues that face the San Francisco Bay/Sacramento-San Joaquin Delta region, and therefore much of California including the major agricultural areas of the Sacramento and San Joaquin Valleys. It has been interesting and educational to track the process for the past year. We appreciate the efforts of you and your staff to solicit input and update stakeholders as the process moves forward.

We have carefully reviewed the CALFED Bay-Delta Program ten comprehensive alternatives for long-term solutions to the San Francisco Bay and Delta water problems. These alternatives all include a set of core actions, and an additional set of actions, each with a different emphasis. We were surprised to find that each of the ten alternatives presented includes a San Joaquin Valley agricultural land retirement component which ranges from 70,000 to 100,000 acres to 750,000 to 850,000 acres.

It is very important that the land retirement component of each of these alternatives be highlighted so that it is clear that this is an integral strategy of each of the alternatives. As presented, the land retirement component is not presented in each alternative overview (except Alternatives A and D). One must delve into the Potential Sequencing section of each alternative to find the land retirement numbers.

Alternative A has an agricultural land retirement component of 750,000 to 850,000 acres. Alternatives B, C, D, E, F, G, H, and J all range from 270,000 to 400,000 acres; and alternative I would require 70,000 to 100,000 acres of agricultural land retirement.

In the latest Phase I Progress Report, most of the Alternatives mention retirement of agricultural land as a strategy for demand management or to improve water quality. However, nothing in these descriptions gives an indication of the amount of land envisioned to be retired.

Agricultural land retirement must be carefully considered before it is included in any of the CALFED alternatives. Our concern is that these numbers can take on a life of their own. Even though agricultural land retirement is always stated to be voluntary in each of the alternatives, if goals aren't achieved voluntarily, mandates may be implemented later.

- Have analyses been performed that project the amount of water demand reduction resulting from agricultural land retirement? To assume that the full amount of crop evapotranspiration will be available may be unrealistic.
- Have any preliminary cost/benefit analyses been performed for this strategy? The costs to retire the land (purchase of land or easements) and the cost to maintain the land may make the resulting water quite expensive.
- What are the economic impacts of retiring 100,000 acres; 300,000 acres; or 800,000 acres of agricultural land to San Joaquin Valley businesses, communities and governments? Third-party impacts are very important to recognize and quantify.
- Have other strategies, such as on-farm reuse, including agroforestry been considered, rather than land retirement to address water quality issues?
- Has this strategy been reviewed by representatives of the San Joaquin Valley Drainage Program? The "Rainbow Report" is now considered to be outdated given the hydrological changes to the San Joaquin Valley resulting from operational changes to the CVP and the SWP under the CVPIA and the ESA. The program is moving away from extensive agricultural land retirement as a drainage water management strategy.

It is our view that implementing agricultural land retirement is a waste of natural resources and a loss of economic opportunity. There are other strategies to address water supply and water quality issues that can benefit both the environment and local economies.

It is quite likely that the amount of water that is projected to become available (conserved) from agricultural land retirement will be significantly less than anticipated. Baryohay Davidoff, manager of the DWR Office of Water Conservation, presented information to the Bulletin 160 Advisory Committee which clearly showed the importance of water reuse in calculating agricultural water use efficiency on a basis. If agricultural land is retired, the amount of water available for reuse decreases, resulting in less water available for land still in production. Individual farm water use efficiencies of 50% (not very good) can still result in high regional water use efficiencies (> 85%) if farm-to-farm reuse of three or four times occurs.

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Furthermore, the University of California used three different economic models to estimate the impacts of reduced surface water deliveries to California agriculture. The results of all three models were reasonably consistent. These results indicate that inflexible policies such as land retirement will have severe economic impacts to agriculture and local economies. More flexible policies that incorporate water conservation objectives, water marketing, and additional conveyance and storage facilities offer the best opportunity to meet California's water needs without adverse economic impacts.

It is very important that these issues are fully developed in the CALFED process. We recommend that at least one of three or two of five final alternatives include no agricultural land retirement component. We also believe it is important that CDFA play an integral role in advising CALFED on agricultural water demand and supply issues and on agricultural land retirement. Please advise us on how we may be of assistance.

Thank you for the opportunity to comment.

Sincerely,



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