

DEPARTMENT OF FOOD AND AGRICULTURE

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November 4, 1997

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

Dear Mr. Snow:

I would like to offer the following comments concerning the summary of the Category III package contained in the agenda packet for the October 28, 1997 Ecosystem Roundtable meeting.

The summary highlights that about \$47 million (77%) of recommended funds are for Floodplain, Marshplain, and Channel Form Changes that include large land acquisitions (15,500 acres, \$34 million). Of this 15,500 acres, all but 200 acres is proposed to be acquired by Federal or public/non-profit joint ventures. These projects, if implemented, could have significant adverse effects, individually and cumulatively on agricultural land and water resources, local economic activity, and the local tax base.

CEQA requires that the EIR consider the "whole of the action." However, early implementation of Category III projects that convert 15,500 acres from agriculture to other uses on a project-by-project basis, even with project specific environmental review, may be viewed as a fragmented and piece meal approach to approval and implementation of the ERPP, and as such not in compliance with CEQA. There is no analysis of alternatives to address avoiding or reducing impacts at the programmatic level. At this time, it appears CALFED has not adequately identified the existing environment which would be impacted. Cumulative impacts to agricultural resources and local economies must be fully described in the Programmatic EIR. Additionally, mitigation measures must be identified to address these impacts. Mitigation costs are to be considered as part of the program.

Furthermore, early implementation of projects resulting in the conversion of 15,500 acres of agricultural land under Category III contradicts the recommendations of the Scientific Review Panel (SRP) concerning the ERPP. Expenditure of 77% of currently available Category III funds on an ecosystem restoration conceptual model that has not been fully subjected to scientific peer review or embraced by the appropriate stakeholders is premature

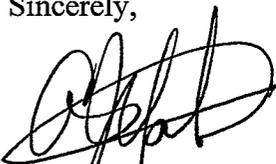
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and may prove to be an ineffective use of public funds. One consistent message from the SRP was that the ERPP is an expression of CALFED staff opinion and vision, that lacks a strong scientific foundation. Is it wise for CALFED to move ahead with such far-reaching and expensive public policy decisions without adequate peer review and wide spread acceptance of the ERPP?

It is my sense that the narrow focus of the RFP lead to decisions by the Integration Panel that validated the draft ERPP. The focus should be on research, planning, monitoring, and non-structural solutions at this early stage, rather than implementation of land acquisition and construction projects. The public policy framework of the solution principles in the Governor's water policy should guide this and all other aspects of the CALFED program implementation.

Concerning a previous matter, I am still awaiting a response to my request of October 1, 1997 for calendaring a technical discussion of agricultural water use efficiency among the members of the CALFED Management Team. Members of the CALFED/DWR staff should present their latest analysis and discussion of water application and use efficiency and how on-farm and in-district water use efficiency is determined. Baryohay Davidoff, Greg Young, and Professor Ken Soloman from CalPoly could make the presentation. Ed Craddock, DWR staff, can also give an update on the Agricultural Water Management Council and compare the features of the Agricultural and Urban WUE/conservation MOUs.

Sincerely,



A. J. Yates
Undersecretary