



# California Farm Bureau Federation

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## THE CAL-FED PROPOSAL TO REALLOCATE AGRICULTURAL WATER AND CONVERT AGRICULTURAL LAND TO OTHER USES

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Viable agriculture requires both land and a reliable and affordable water supply. Without land and water, agriculture will cease to exist. A review of the most recent Cal-Fed Phase II Alternative Descriptions (including appendices) reveals that both agricultural land and water are being targeted as part of the Cal-Fed program.

The central tenet for Cal-Fed is that: "all interests will move forward together." This means that the net benefits and burdens for the program must be balanced across stakeholder groups and that there will be no significant redirected impacts. When viewing the program from a statewide perspective, however, it is clear that the proposed delta solution is forcing agriculture to move backwards--not forward. At the present time, there is little (if any) benefit to California agriculture, yet the burdens rest squarely on the shoulders of agriculture. The following is a general summary of the program components that will adversely affect agricultural land and water and the attendant environment. This summary is only intended as an overview and in most cases the detail is commensurate with the detail given in the Cal-Fed documents. The cumulative impacts of this program are alone significant, but are even greater when considered in the context of the reallocation plans for the Colorado River and other numerous delta programs.

### COMMON PROGRAMS

#### 1. **Ecosystem Targets (Appendix A)**

The ecosystems targets in the Ecosystem Restoration Program Plan (ERPP) will reallocate both agricultural land and water.

##### (A) **Water**

Significant pulse flows are targeted for both the Sacramento and San Joaquin River Systems. These flows could apparently total 300,000 to 500,000 acre feet of water. Although it is not stated as such, the water

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for these pulse flows will likely come from existing agricultural water supplies. Additionally, the nearly 200,000 acres of agricultural land that will be converted to other uses (see below) have primarily riparian and pre-1914 water rights that also appear to be converted to other uses. Converting agricultural land to wetlands will also consume much more water per acre than farm lands. This additional water will likely come from other farm lands.

**(B) Land**

It appears that nearly 200,000 acres of prime farmland will be converted to other uses under the current Cal-Fed plan. This conversion is couched in terms of:

- Creating setback levees.
- Conversion to wetlands/slough complexes.
- Restoring riparian habitats.
- Restoring shallow water habitat.

In addition to the land use issues, there are the associated water impacts, which were discussed above.

**2. Water Quality (Appendix B)**

There are two important water quality measures that could adversely affect agriculture.

**(A) Salinity levels**

Maintaining salinity levels required by the program requires dilution water, which will likely come from agricultural water users and the pumping of additional groundwater supplies that will affect agricultural water use.

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**(B) Agricultural drainage**

There is currently no meaningful proposal to address salt issues in either the Sacramento or San Joaquin Valleys. In fact, the program, by reallocating existing agricultural water supplies that are necessary for leaching, will exacerbate any salt problems.

**3. Water Use Efficiency**

Although AB 3616 will be used as the basis of the agricultural water efficiency program, there is a continuing desire to undermine agricultural water rights and to place more stringent regulations on water use by agencies and farmers and ranchers. The water resulting from more efficient water uses in non-agricultural uses will continue to be available by those sectors, but any water that is made available by agricultural water efficiency (if any) will also be made available to other, non-agricultural uses. This is further evidence of the reallocation of water from agriculture to other uses.

**4. System Integrity (Appendix D)**

As discussed before under ecosystem targets, it appears that prime agricultural lands will be taken out of production by setback levees and by conversion to a bypass system.

**5. Conjunctive Use**

The conjunctive use program has not been fully developed, but targets in all three alternatives range from 0 to 500,000 af in the Sacramento Valley and 0 to 500,000 af in the San Joaquin Valley. It appears that "conjunctive use" under the program means transferring groundwater, either directly or indirectly, for non-agricultural uses as part of the program. This is another reallocation of important groundwater resources.

**6. Water Transfers**

Although the discussion is just beginning with water transfers, it is presumed that water transfers will occur from the agricultural to urban and environmental uses. In many cases, this means that additional agricultural water supplies (and possibly land) will be reallocated to other uses.

### CONVEYANCE AND STORAGE ALTERNATIVES

It is still too early to evaluate the conveyance and storage options for the program, although it is probably safe to say that from an agricultural perspective, certain parts of the state will be significantly impacted (i.e., delta, area of origin areas) and other parts may benefit from this component of the program. Any benefit will be dependent upon the affordability of the solution, assurances that there will be additional water supply reliability, and assurances that the program will be operated properly. It appears that new storage in the program will not increase the yield of the system, but instead will merely reallocate the timing of flows away from agricultural uses.

### FINANCE

Although a benefits approach was initially discussed as part of the program, there now appears to be a desire for punitive measures that require all water users to pay for any Cal-Fed solution, regardless of whether they receive any benefit. This appears to mean that those who receive no benefit from the Cal-Fed solution, such as the large majority of agricultural water users, will nonetheless be required to pay for it. It also appears that agricultural water users will be asked to contribute to the program so that their land and water can then be acquired.

### ENVIRONMENTAL REVIEW

Agriculture in California is an environmental resource of global significance. Both agricultural land and water are an important part of the productive environment that must be considered under both NEPA and CEQA. As the previous discussion shows, the program as currently proposed will have significant impacts on agricultural land, water and the agrarian way of life. Yet, despite federal and state laws and the potentially significant impacts to agriculture and the attendant environment, it appears that Cal-Fed will not consider these impacts in its Programmatic EIR/EIS. The cumulative impacts of this program, in conjunction with the implementation of Central Valley Project Improvement Act (CVPIA), the Bay/Delta water rights process, the Department of Water Resources Supplemental Water Purchase Program and numerous other actions that affect the delta, will be particularly significant. Additionally, there does not appear to be any discussion of alternatives that will have less impact on agricultural land and water as required by NEPA and CEQA.