



To: Lester Snow, Executive Director
CALFED Bay Delta Program

February 9, 1998

Thank you for the opportunity to comment on the Administrative Draft Programmatic EIS/EIR for the CALFED Bay Delta Program.

What follows is a short list of issues we feel should be more carefully addressed or clarified with the release of the public version of the draft document.

- Estimates of the economic effects on agricultural resources from the ERPP, Levee Program, Water Use Efficiency Program, and the storage and conveyance component of all alternatives is based on an assumption that annual gross revenues from "farmland" impacted by these programs ranges from \$500 to \$1000/acre. This value seems rather low when considering the amount of high value production cropland targeted for conversion under the ERPP. We would suggest that the economic effects on agricultural resources from each common program and the storage and conveyance components of the alternatives be dealt with individually. This type of display should give the reader a much clearer idea of the potential effect on farm production from each of the common programs, as well as the storage and conveyance components of each alternative.
- The common programs, along with the storage and conveyance elements of the program will displace significant amounts of agricultural lands from floodplains, Delta islands, and other sensitive areas. The document does not seriously address whether farming operations displaced by CALFED programs will "migrate" to other areas of the Central Valley, and if so, what are the likely effects of this migration? One concern is that CALFED program displacement may result in increasing pressure to develop low foothill lands for agricultural purposes. Increased rates of agricultural development within this area would certainly effect several environmental and economic values considered important to the CALFED Bay-Delta Program.

Most of our other comments on the Administrative draft our minor and technical in nature. These comments were submitted to CALFED staff last week.

Overall we feel that the document is nearly complete and acceptable for release to the public for review. Hopefully our concerns can be easily addressed, and not delay release of the draft document for public review.

Again, thank you for the opportunity to comment on this important document.



John M. Lowrie

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