

## **CDDA COMMENTS CONCERNING AGRICULTURAL RESOURCES**

PAGE NUMBERS REFER TO SUPPLEMENT DOCUMENT (PAGES ATTACHED)

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Page 8-9 - Revised Table 8.1-1 - Agricultural Land and Water Use - Other Programs - As now analyzed, the ERP could create a water demand for habitat in the range of 196,800 to 280,800 ac-ft/yr in the delta. The ERP also contains environmental flow requirements that embody additional water. The potential adverse impact to agricultural water supplies associated with these actions needs to be stated in this summary table.

### **Agricultural Land and Water Use**

Page A-96-97 - Sacramento River and San Joaquin River Regions - Ecosystem Restoration - The second paragraph states that, "Habitat restoration in [these regions] may not require as much additional water per acre of habitat as the Delta Region, because much of the floodplain and meander corridor vegetation would be sustained by soil moisture and shallow groundwater storage resulting from rainfall and storm flows." This statement may be true for the Sacramento Valley, but certainly not true for the San Joaquin Valley. There is significantly less rainfall in the San Joaquin Valley, in general groundwater is in chronic overdraft, and stormflows are much less frequent. Furthermore, ET is higher, thus it is likely that water-dependent habitat in the San Joaquin Valley will require more water than similar habitat in the Delta.

Page A-97 - Water Quality - second paragraph - The assumption of 3 ac-ft/ac of applied water that may be applied if 45,000 acres of drainage impaired land are retired may be an overstatement. This land would most likely receive a Class I or II CVP water allocation (2.5 or 1.25 ac-ft/ac). Groundwater may, or may not provide additional supply. This is not discussed under Water Quality in the Delta Region section, as referenced here.

Page A-99 - Mitigation Strategies - Avoidance or minimization strategies could include but are not limited to:

Page A-101 - the last mitigation bullet is applicable to all CALFED actions, not just to the Levee Program.

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Page A-101 - Potentially Significant Unavoidable Impacts - Potentially significant agricultural water supply impacts, over and above those embodied in land conversion (i.e. increased water demand for wetlands habitat) have been identified and should be stated here.

### **Agricultural Economics**

Page A-101-A102 - Delta Region - Ecosystem Restoration - The impacts on agricultural gross revenues is underestimated. Most likely, field crops would be encouraged since their feed and habitat value for wildlife is more beneficial than vines, orchards, and vegetables. These higher gross value crops would be most likely to be the target of

habitat development (particularly vegetable acreage, since this land would be easier to convert than land with permanent crops). In San Joaquin Co., the number 5 agricultural county in California, the top agricultural crops were grapes, almonds, tomatoes, asparagus, cherries, and hay. The county is also a significant producer of sweet corn and potatoes. Each of these vegetable crops has a gross value per acre of \$2,000 to \$8,000 per acre. The orchard crops each has a value of over \$2,000 per acre. Dairy is the second ranked commodity in the county, dependent on locally grown feed. Even lower grossing hay and grains are used to support a high value agricultural product - milk.

Page A-108 - Potentially Significant Unavoidable Impacts - Potentially significant agricultural water supply impacts, over and above those embodied in land conversion (i.e. increased water demand for wetlands habitat) have been identified and should be stated here.

General comment on mitigation of agricultural land, water, social, and economic impacts: A CALFED policy statement concerning agricultural impacts mitigation is under development. Once approved, CDFA welcomes the opportunity to work with CALFED staff and agency representatives to further refine potential mitigation actions, develop a mitigation framework and process to support the policy declaration, and further develop the mitigation monitoring plan. CDFA considers the lists of potential mitigation measures for agricultural resource, social, and economic impacts to be suggestive, and not all inclusive in addressing agricultural impacts.

#### **Water Supply and Water Management**

Page A-25 - Delta Region - Ecosystem Restoration - It should be noted here (as on page A-94) that increased water demand resulting from conversion of Delta agricultural land to wetlands will adversely impact agricultural water supplies.

Page A-29 - San Joaquin Region - Ecosystem Restoration - Since most agricultural land conversion to wetlands is proposed in or north of the Delta, resulting in increased water demand in those regions, the potential result could be reduced water supplies available for pumping to water users south of the Delta. The agricultural land conversion impacts would be felt in and north of the Delta, but the agricultural (and urban) water supply impacts would be felt in the export regions.