

Agricultural Resources

AGE

Barris Farms

Ltr#: 01516 22

Mitigation programs should include significant additional fee collection to pay for all costs associated with primary and secondary environmental restoration programs for both current and future transfer sales. Agricultural production losses or land idling should be considered undesirable and be proportionally offset with fees to local counties that suffer economic losses.

Butte-Sutter Basin Area Groundwater Users Corporation

Ltr#: 01290 6

The true cost of water transfers must be addressed. Specifically, the costs of mitigating third party economic impacts of agriculture, industry and communities which have the potential of being millions of dollars annually must be documented.

Centerville Community Services District

Ltr#: 01344 36

Please refer to Table 8.1.2-2, Farm Income and Production Expense in All Regions, 1987 to 1992. It appears that there is a typographical error in the number of Full Owners of farms in the San Joaquin River Region in 1992.

City of Redding, Office of the City Attorney

Ltr#: 01721 30

Section 8.1: Such a program could have a positive impact on water supply, quality and reliability and should be considered in the program analysis.

City of Redding, Office of the City Attorney

Ltr#: 01721 29

Section 8.1: The EIS/EIR should analyze fully the benefits and impacts of agricultural land retirement in areas South of the Delta that contribute substantial quantities of poor quality return flow in the Bay-Delta.

Delta Protection Commission

Ltr#: 01024 13

The DEIR indicates there will be adverse economic impacts in the Delta associated with the retirement of agricultural land for habitat conversion. However, the DEIR reaches the conclusion that the economic impacts will not adversely affect the regional economy, apparently bundling the Delta economy into the Sacramento-Stockton region for analysis. The ERPP alone would result in loss of close to half of the agricultural lands in the Delta Primary Zone.

Comment: The DEIR should evaluate impacts to the economy of the Legal Delta, including property and sales tax impacts, address primary impacts to landowners, and address secondary impacts to laborers, suppliers, processors, associated support industries, etc., when evaluating the economic impacts.

Environmental Water Caucus

Ltr#: 01424 51

Under Agricultural Economics the analysis fails to indicate how water use efficiency measures can improve sustainability by enabling farmers to maintain the same level of economic productivity by maintaining or increasing yield even with a reduced water supply. Water use efficiency can also save costs on other inputs such as pesticides and fertilizers, by allowing more efficient applications as well as saving on energy costs.

Friant Water Users Association

Ltr#: 01335 29

In Section 8.1, the Draft PEIS/EIR state that the crop revenue loss associated with taking lands out of production range from \$500 to \$1,000 per acre, resulting in a total loss in crop revenue between \$25,000,000 and \$50,000,000 in the San Joaquin River Region. The figures of \$500 to \$1,000 in gross revenue per farmed acre were used as basic assumptions in evaluating the impacts of the Program on regional economics. The Draft PEIS/EIR recognizes that this would have a "substantial adverse economic impact on farm revenues, income generation, and employment levels. Loss of production may also adversely affect the financial viability of local agencies, especially water and Reclamation districts." We believe these figures are much too low and that the crop revenue loss in the San Joaquin River Region would be far in excess of \$50,000,000. For example, growers within the Friant Division have approximately 960,000 acres under irrigation. Of these, more than 485,000 acres, or 51%, are planted in permanent crops consisting of trees and vines. The average annual value of the crops in the area served by the Friant Division is approximately \$3.5 billion dollars. This is an average of approximately \$3,645 per acre per year. The Draft PEIS/EIR should reevaluate the figures used to determine crop losses in the San Joaquin River Region from converting farmland, refining the financial impacts using more realistic data.

Herum, Crabtree, Byer, Zolezzi, & Terpstra, LLP

Ltr#: 01807 43

Page 8.1-36 Environmental Consequences: Agricultural Economics San Joaquin River Region: Under the Storage and Conveyance discussion there is a statement that CVP contractors would be the primary beneficiaries in the Sacramento River Region. However, there is no corresponding statement for who would benefit in the San Joaquin River basin. While there is a general statement that water will be used to reduce groundwater overdraft, there needs to be a more thorough analysis of who can and should benefit from an increase in water supply. SEWD as one of two CVP contractors on the Stanislaus River has suffered the brunt of the reallocation from both the CVPIA and the Bay-Delta Accord. There must be a recognition of those who have borne the burden of the reallocation and a corresponding accommodation when new supplies are developed. Furthermore, the entire issue of who should finance and bear the cost of the new surface water storage improvements must be addressed. Specific consideration must be given to those in the area of origin because they have not had the benefit of the past fifty years of subsidized water rates that others have enjoyed. Please refer to our comments on financing issues in our Phase II - Interim Report comments.

National Audubon Society

Ltr#: 01747 22

* Under Agricultural Economics the analysis fails to indicate how water use efficiency measures can improve sustainability by enabling farmers to maintain the same level of economic productivity by maintaining or increasing yield even with a reduced water supply. Water use efficiency can also save costs on other inputs such as pesticides and fertilizers, by allowing more efficient applications, as well as saving on energy costs.

National Audubon Society

Ltr#: 01747 54

There is a great deal of discussion in the DEIS/R devoted to the impacts on the community from the loss of agriculture-related jobs if agriculture lands are retired. This is a very one sided discussion. At least it should also include a discussion of farming marginal lands, as recommended by EWC, and jobs that would be gained by having a more productive and clean Bay-Delta, i.e. more recreational and commercial fishing, bird watching, hunting, tourism, etc.

Reclamation District No. 2068

Ltr#: 01448 11

Given the scope of the proposed land conversions in the Delta, the resulting reductions in revenue to local governments need to be described and quantified in the EIR/EIS and mitigation measures incorporated to reduce impacts to local governments. This issue is largely ignored by the Draft EIR/EIS. The only references we identified in the Draft EIR/EIS concerning governmental fiscal impacts were in Sections 8.1.4.4 and 8.6.2.4.

"Additionally, the loss of farmland may adversely affect the financial viability of local agencies, especially water and reclamation districts.

"The loss of property taxes would have a substantial negative effect on public finance for county and municipal jurisdictions within the area.

Since the impact is identified as substantial but not significant, no or inadequate mitigation measures are proposed in the Draft EIR/EIS to mitigate for these effects. These effects must be discussed in detail and identified as significant.

Reclamation District No. 2068

Ltr#: 01448 105

Under "Mitigation Strategies" add a bullet stating that land taken out of production for CALFED purposes will continue to pay assessments to local agencies, such as levee protection/reclamation districts. Also add bullet providing a mitigation strategy for farms that are adjacent to newly formed restoration projects, which attract special status species. Operations on existing agricultural lands should not be impacted by a new CALFED developed mitigation project.

Reclamation District No. 2068

Ltr#: 01448 104

In Table 8.1.4-2, why are there no north Delta salinity numbers? There are significant agricultural diversions in the north Delta. If the different configurations have no impact on north Delta agricultural water quality, this should be specified.

Reclamation District No. 2068

Ltr#: 01448 44

Conversion of active Delta agricultural land to ecosystem restoration or other CALFED purposes will have a significant negative impact on the general economy of the north Delta as well as impacts to local government agencies, including reclamation districts. The Draft PEIS/EIR identifies possible mitigation measures, however it fails to adequately analyze what the economic impacts would be of large scale agricultural land retirement in the north Delta. Additional analysis focused on the north Delta should be included in the draft PEIS/EIR.

Reclamation District No. 2068

Ltr#: 01448 47

Add a bullet under "Potential concerns of the habitat restoration program include:" regarding economic impacts from the conversion of agricultural land to habitat restoration. The economic impacts are to local public agencies and the general economy of the area near habitat restoration programs.

Reclamation District No. 2068

Ltr#: 01448 61

Under "Agricultural Economics" there is mention of a loss of jobs and economic income in the San Joaquin River region as lands are retired. A similar statement should be added to the Delta region due to conversion of agricultural land to ecosystem habitat.

Reclamation District No. 2068

Ltr#: 01448 103

In Section 8.1.4.4. The economic impacts of the CALFED program to a Delta city such as Rio Vista should be evaluated as an example. The multiplier effect to the local economy of taking agricultural land out of production should be analyzed. Analysis to the economic impact on city government should be included. This analysis should also be included in Section 8.6 Regional Economics.

Reclamation District No. 2068

Ltr#: 01448 12

Mitigation measures should be incorporated into the EIR/EIS and enabling legislation for the CALFED program which would amend State and Federal statutes to provide for a payment in lieu of assessments and taxes to Delta jurisdictions for lands taken off tax and assessment rolls. Alternatively, we suggest that the Final EIR/EIS and the ERPP specify that land acquisitions be undertaken, owned and managed by private nonprofit entities such as the Nature Conservancy or County Land Trusts. Private entities are subject to assessment and property taxation. This issue deserves serious consideration as CALFED proceeds to design institutional structures necessary to implement the ERPP. Delta agencies cannot afford multimillion dollar reduction in land based revenues.

The EIS/R states, in the discussion of agricultural economics (p.8.1-5), that the alternatives "would potentially increase the amount of water available for agricultural production in some regions." However, the impacts on agricultural economics are determined by far more than the availability of water. In particular, the EIS/R fails to discuss the impacts which the alternatives would have on the price of water a factor of great importance to agricultural water users in the Central Valley.

At a Congressional hearing on April 15, 1998, agricultural representatives testified that they were unable (or at least unwilling) to pay water rates in the range of \$30 per acre foot. According to the Least-Cost Yield Study, prepared by the Department of Interior pursuant to the Central Valley Project Improvement Act, the cost of new water developed through new surface storage projects (one of the strategies featured most prominently in the DIES/R alternatives) ranges from \$300 to \$3,000 per acre foot.

Therefore, CALFED could increase water supplies for agriculture, but that agricultural water users would be unable to purchase that water, resulting in no benefits to the agricultural economy. Alternatively, if, through CALFED assurances and financing packages, agricultural interests were compelled to pay for this water, these CALFED alternatives could result in significant negative impacts on the agricultural economy.

By failing to analyze the cost of water developed through alternative water supply strategies and by failing to develop a financing package, the document fails to present adequate information to perform an analysis of impacts to the agricultural economy.

We recommend that the DEIS/R be revised to include an economic and financing analysis adequate to determine potential benefits and impacts to the agricultural economy.

Shasta County Water Agency

Ltr#: 01048 38

Please refer to Section 8.1.5.6, Mitigation Strategies, first bullet. "Strategies for minimizing the Social/employment impacts as a result of agricultural land conversion include: Continuing the flow of property tax revenues to the local counties. . . ." Please substitute "Restoring and supplementing" for "Continuing.

Solano County Water Agency

Ltr#: 01511 25

Under "Agricultural Economics" there is mention of a loss of jobs and economic income in the San Joaquin River region as lands are retired. A similar statement should be added to the Delta region due to conversion of agricultural land to ecosystem habitat.

Western Water Company Corporate Office

Ltr#: 01734 4

General policy statements in the Draft EIR/EIS promote water transfers, but the detailed information in the document either does not adequately consider the impacts of such transfers or focuses primarily on the negative aspects of transfers, as opposed to presenting a balanced picture of the advantages and disadvantages of transfers. An indication of this is the fact that in determining economic impacts, assumptions were made that no transfers will occur (for example, sections 8. 1 .4.3 and 8.2.3. 1). It is difficult to reconcile these assumptions with the Water Transfer Component's stated goals to "promote, encourage, and facilitate water transfers." It is simply not appropriate to suggest, on one hand, that water transfers are critical to a solution and then, on the other hand, to plan a physical response that assumes away the advantages of transfers.

Williams Reynolds

Ltr#: 01332 3

The San Joaquin County Agricultural Commissioner's 1997 Annual Crop Report shows that the county has 555,819 acres of total crop land, retiring 100,000 acres is 18% of that total. This translates to a possible reduction in the total value of the county crops of \$267 million which further converts to a minimum \$856 million reduction to the county economy using a 3.2X multiplier. This is not insignificant, and the loss to the county's cities and towns cannot be mitigated.

Further statistics contained in the 1997 Agricultural Report for San Joaquin County indicate that idling 100,000 acres from the present agricultural use would have an unmitigatable effect on about 200 delta fanning operations and would reduce the agricultural work force by more that 2800 persons.

Williams Reynolds

Ltr#: 01332 2

Further the Draft EIR is misleading on page 8.1-17 where Table 8.1.2-3 shows that San Joaquin County has ben split 46% to the Delta Region and 54% into the San Joaquin Region for economic analysis. By combining 54% of San Joaquin County with areas as far south as Fresno it is easy to show a nil economic effect from retiring land from Ag production.

Williams Reynolds

Ltr#: 01332 1

I am concerned that the Programmatic Draft EIS/EIR report does not fully evaluate the economic effect on San Joaquin County that would be caused if 100,000 or more productive agricultural acres are converted in some fashion to wildlife habitat. An editorial in this morning's Stockton Record identifies agriculture as the engine that drives the San Joaquin County economy; it further states that San Joaquin County is one of the top 10 ag-production counties in the nation.

The Draft EIR on page 8.1-14 says that a 3.2X multiplier was used to measure the economic impact of retiring significant agricultural acreage. Using this multiplier agriculture added \$4.76 billion to the county economy based on the \$1,487,476,000 in farm products produced in 1997 per the County Agriculture Commissioner's 1997 Annual Crop Report.

The County Agriculture Commissioner's Office feels that the 3.2X multiplier used in the Draft EIR is low. The Ag Commissioner's Office uses a 5.2X multiplier that they obtain from the University of California Agricultural Extension Service. This change results in over \$2.97 billion dollars of income rippling through the county that was not considered in the Draft EIR which states that there will be no negative economic consequent from converting 100,000 or more acres from agricultural production to habitat.

Yolo County Board of Supervisors

Ltr#: 01336 9

* Create tax incentives for long-term agricultural zoning.

The state already implemented the Williamson Act, as well as recent programs to encourage the establishment of long-term agricultural conservation easements. In addition, Proposition 13 has resulted in significant tax breaks for many farmers, who often hold onto their land for decades. Additional tax incentives will not provide significant new protection for remaining land, nor will it mitigate losses projected under the Program.

Yolo County Board of Supervisors

Ltr#: 01336 6

* Continue the flow of property tax revenues to the local counties;

As was pointed out in the EIS/EIR, the current flow of property tax to the counties has been adversely affected by ERAF funding. In addition, the CALFED participating agencies do not have an effective role in the formulation of either the federal or State budget. Although this measure is critical to offset the significant losses that will be incurred by local agencies because of the Bay-Delta Program, there is no certainty that it will be implemented. Finally, revenue offsets should not only include direct agricultural impacts, but indirect impacts created by losses associated with agricultural industry.

Yolo County Flood Control & Water Conservation District

Ltr#: 01445 19

For example, the DRAFT EIS/EIR estimates that the CALFED ecosystem restoration program will result in loss in crop revenue of between \$13 million and \$34 million per year in the Sacramento River region, and acknowledges that there would be a substantial adverse economic impacts on farm revenues, income generation, employment levels and even the financial viability of water districts. (see e.g. page 8.1-36.) Between 650 and 3,000 jobs might be lost (page 8.6-13). These impacts are identified in the Draft EIS/EIR as "potentially significant unavoidable impacts". (See, e.g., page 8.1-31.) The program should be revised in order to avoid these redirected impacts and remain consistent with the CALFED principles.

AGR

California Farm Bureau Federation

Ltr#: 01383 13

Second, if no feasible alternatives are available to protect agricultural resources, then appropriate mitigation measures must be adopted with respect to both agricultural land and water. (40 C.F.R. 1505.3, 1508.20; Pub. Res. Code §21081; 21081.1.) Although the mitigation measures in chapter 8 of the PEIS are a good start for agricultural resources, the mitigation needs to be taken more seriously and there needs to be an expectation that any impacts on agricultural resources can be fully mitigated to maintain viable agriculture throughout California.

California Farm Water Coalition

Ltr#: 01423 1

The Coalition believes that the costs of purchasing and managing the significant acreage discussed in the PEIS/R are prohibitive. Furthermore, the negative local and regional economic and employment impacts would be significantly greater than published CALFED estimates. Land retirement would affect direct farm income as well as income generated throughout the production chain (i.e., in the supply, transportation, marketing, processing and retail sectors). Before any proposal to purchase agricultural land is advanced further by CALFED, full disclosure of these linkages and related costs must be made.

Centerville Community Services District

Ltr#: 01344 38

In discussing agricultural resources, implicit in the DEIS/EIR discussion is that all agricultural users, even in areas of origin, will be detrimentally affected in nearly all of the alternatives under consideration. Accordingly, the DEIS/EIR appears to disregard existing area of origin protections, where "Surplus" Sacramento River basin water may be exported, but only if all beneficial uses within the Sacramento watershed have been supplied with water. This, too, should be discussed in the CALFED environmental document.

Centerville Community Services District

Ltr#: 01344 37

Please refer to Table 8.1.1-2, Page 8.1.10. There are many significant discrepancies between this table and Section 8.1.2.4, Sacramento River Region, Existing Conditions, Cropping Patterns and Production Value, Page 8.1-22. According to the text of Section 8.1.2.4, Rice and Field Crops are the top two crops in the Sacramento River Region. However, per Table 8.1.1-2, neither category is in the top five. It appears, based upon DWR Bulletin 160-93 and other commonly accepted references, that it is Table 8.1.1-2 that is in error. Similarly, Agricultural Production Costs and Revenues is internally inconsistent and at odds with Table 8.1.2-2. These drastic discrepancies should be resolved.



City of San Jose

Ltr#: 01362 5

Clarify potential impacts of water transfers San Jose supports the development of a water transfer and marketing program that provides a reliable water supply to the Santa Clara Valley, encourages statewide water use efficiency, reduces the need for new storage and conveyance facilities, and improves the condition of the Bay-Delta ecosystem. Water transfers that would enable the conversion of prime agricultural lands to urban uses are undesirable to the City. CALFED should clarify the impacts that water transfer and marketing schemes and would have on prime farmlands and agriculturally-dependent communities.

Colusa County Board of Supervisors

Ltr#: 01407 8

California regulations have restricted rice farmers in numerous ways, i.e. burning, pesticide and herbicide use, and water diversions. This has resulted in the reduction of ground planted to rice, and reduced yields in fields that remain in rice production. However, CalFed calls for the increase of rice acreage for use as seasonal wetlands. CalFed's recommendations must take into consideration the effect of current legislation on real farming, and market practices.

Community Alliance with Family Farmers

Ltr#: 01753 26

Land "conversion" to restore riparian and other habitat and for over environmental purposes is clearly a necessary part of Delta restoration. However, CALFED has not sufficiently considered the advantages of allowing existing farmers and landowners to carry out and manage this restoration, rather than relying on state agencies. Many farmers who are already participating in watershed restoration programs or who are providing wildlife habitat areas on their farms either independently or with local Resource Conservation Districts, could be used as "model farms" and show other farmers how it is done, what the costs and benefits are, and so on. The model CAFF has pioneered with its BIOS program, including researchers, mentor farmers, technicians, and local agency officials to provide assistance, monitoring, and evaluation for participating farmers, could be one approach to implementing such a program. There are other successful models from Ohio, New York, Maryland, Florida and other states where landowners participated in restoration efforts.

County of Sacramento

Ltr#: 01517 1

We strongly urge CALFED to expand its analyses to include a balanced assessment of the social, as well as the economic, impacts of the proposed program on Delta communities. Agriculture, tourism and recreation all serve to help sustain these communities. A comprehensive analysis must, at a minimum, include both the positive and negative impacts to these lifestyles and businesses within these communities.

Delta Protection Commission

Ltr#: 01024 12

The DEIR does not suggest any mitigation for the permanent loss of prime farmlands, although the California Environmental Quality Act (CEQA) indicates that conversion of prime agricultural land will result in a significant effect on the environment. The DEIR indicates that up to 105,000 acres of prime agricultural land would be permanently lost through implementation of the ERPP.

Comment: The DEIR should analyze if there is a need to mitigate the loss of prime agricultural land under CEQA. Possible mitigation could include permanent protection of agricultural lands through conservation easements; these easements could help carry out the goals of the ERPP's wildlife friendly agriculture component, or the watershed management program.

Delta Protection Commission

Ltr#: 01024 11

Acquisition and retirement of additional privately-owned agricultural lands should be conditioned to ensure:

- 1) proposed restoration projects shall not adversely impact Delta water quality, particularly salinity levels; and
- 2) proposed restoration projects shall not adversely impact existing uses on adjoining lands or adjacent islands.

Department of Water Resources

Ltr#: 01837 158

Land use changes, page 5-5, page 8.1-26, and elsewhere. CALFED proposes significant conversion of irrigated agricultural lands to habitat. In order to assess the water use impacts of these land use changes, it would be helpful for the EIR/EIS to tabulate the program's total converted acreage, and estimated water use changes. It appears to us that CALFED's total potential reduction of irrigated land use is 289,500 acres. Is this correct?

Department of Water Resources

Ltr#: 01837 159

Irrigated acreage table 8.1.1-2. Acreage data needs to be checked and corrected. There are not, for example, 527,000 irrigated acres of rice in the San Joaquin River region.



Department of Water Resources

Ltr#: 01837 160

Land use changes due to ecosystem restoration, page 8.1-26. The text states that some of the 115,000 acres of irrigated land use may be shifted to the Central Valley or elsewhere. How much and where? Since the water supply is intended to remain with the land converted for habitat, this action would potentially create a new water demand of over 300 TAF elsewhere for the shifted agricultural land use (which is about the same as the new water supply provided by Alternative 3!). The draft needs to be more specific about water use and water supply impacts of land use conversion.

Friant Water Users Association

Ltr#: 01335 31

Finally, in Section 10 of the Draft PEIS/EIR, there is a conclusion that improvements in the water supply could allow additional agricultural land to be developed and allow a shift to higher value crops. The Draft PEIS/EIR concludes that it "is possible that there would be a net gain in agricultural land in the San Joaquin River Region...." It is unclear how the Draft PEIS/EIR can state in Chapter 10 that the San Joaquin River Region could experience an increase in agricultural land while stating in previous chapters that there would be a loss of approximately 11,000 acres of land to conversion of agricultural land to other purposes.

Greg Steel

Ltr#: 01257 14

It appears that Cal-Fed made assumptions about environmental and urban-related needs, but it is not clear what assumptions were made to meet California's food needs (as distinct from projected agricultural production) around the year 2015. Is this true?

Kronick, Moskovitz, Tiedemann, & Girard

Ltr#: 01512 30

The range of crops produced in semi-arid regions should be considered as a possible source of conservation.

Northern California Water Association

Ltr#: 01508 46

The mitigation "actions" to alleviate impacts to agricultural resources are more difficult to accept. Providing advice on how to "stretch existing water supplies in cost-effective ways to keep water acquisition costs down" and "ways to increase the production yielded from a unit of water" is not mitigation. In order to comply with CEQA, the mitigation measures must be expanded and strengthened.

Northern California Water Association

Ltr#: 01508 59

The CALFED Draft PEIS/EIR (page 8.1-27) briefly mentions that agricultural land may be removed from production because of increased costs and decreased profitability which could result from required efficiency improvements or increased district water charges (for example, as part of tiered water pricing). This statement is remarkably similar to projected impacts of the CVPIA on westside Sacramento Valley contractors. Due to proposed tiered water pricing, the CVPIA PEIS estimates that up to 570,000 acre-feet of CVP water could be unaffordable for existing users and not used for water service contract demands. Associated with this loss of water, 56,000 acres of land are expected to go out of production in the Sacramento Valley and possible groundwater impacts may result, as discussed previously. Conversion or loss of agricultural land would be a potentially significant adverse land use impact of this program, particularly when assessed in light of the Central Valley Project Improvement Act.

Reclamation District No. 2068

Ltr#: 01448 10

It appears that CALFED has abandoned its concept of "no significant redirected impacts" and is bent on imposing such impacts upon the Delta region. We find this concept of "no significant redirected impacts" impossible to reconcile with the Mitigation Strategies, Section 8.6.2.6, that state:

"Phase project elements to allow local economies to gradually adjust to new conditions." and, "Minimize job loss to the extent possible by relocating facilities and shifting agriculture to new areas.

This approach is unacceptable, the Delta regional economy and agriculture is not expendable, and certainly should not be exported to other areas regardless of the perceived benefits.

Reclamation District No. 2068

Ltr#: 01448 101

In the paragraph on the State Water Project, the paragraph will be clearer if only the counties (or areas) receiving State Water Project agricultural supplies are listed.

Reclamation District No. 2068

Ltr#: 01448 8

We must strongly disagree with the conclusion of the Draft EIR/EIS in Section 8.6.2.7 regarding agricultural impacts that:

"No significant economic impacts are expected. Substantial effects on farm revenues and employment may occur as agricultural lands are converted to other uses." Given the magnitude of the land conversions planned under the program the EIR/EIS must be revised to identify that the economic impacts of CALFED agricultural land conversions are both substantial significant. Any attempt to claim otherwise undermines the credibility of the entire Draft EIR/EIS.

Reclamation District No. 2068

Ltr#: 01448 7

Both of the counties in which we operate, Solano and Yolo, have worked hard to preserve agricultural lands through local land use restrictions and are concerned about the potential impact of the ERPP and other CALFED program elements on the agricultural land base. The EIR/EIS recognizes the potential conflict with local land use plans, and the mitigation proposed is to:

"work with regional jurisdictions to amend local plans and policies to bring Program features into compliance" (Section 8.1.3.5).

This is unacceptable, any CALFED plan needs to commit to work within local determinations, not in defiance of such.

Reclamation District No. 2068

Ltr#: 01448 9

It is our position that the conversion of agricultural lands for habitat purposes do result in significant impacts, CALFED should implement program elements and mitigation measures that would reduce these impacts to insignificant. These measures might include the following:

- 1) Limiting habitat development to lands currently owned by governmental entities or not currently developed for agricultural production.
- 2) Relocation of habitat projects to areas other than the Delta, such as the upper Sacramento Valley and the San Joaquin Valley.

Reclamation District No. 2068

Ltr#: 01448 15

The creation of wetlands next to existing agricultural operations also presents the potential problem of seepage from areas of created wetlands onto adjacent properties.

Shasta County Water Agency

Ltr#: 01048 37

In discussing agricultural resources, implicit in the DEIS/EIR discussion is that all agricultural users, even in areas of origin, will be detrimentally affected in nearly all of the alternatives under consideration. Accordingly, the DEIS/EIR appears to disregard existing area of origin protections, where "Surplus" Sacramento River basin water may be exported, but only if all beneficial uses within the Sacramento watershed have been supplied with water. This, too, should be discussed in the CALFED environmental document.

Solano County Board of Supervisors

Ltr#: 01363 5

Solano County strongly disagrees with the conclusion of the Draft EIR/EIS in Section 8.6.2.7 regarding agricultural impacts that: "No significant economic impacts are expected. Substantial effects on farm revenues and employment may occur as agricultural lands are converted to other uses." Given the magnitude of the land conversions planned under the program Solano County requests that the EIR/EIS be revised to identify that the economic impacts of CALFED agricultural land conversions are both substantial and significant. Any attempt to claim otherwise undermines the credibility of the entire Draft EIR/EIS.

Solano County Board of Supervisors

Ltr#: 01363 4

The County is concerned that the most attractive location for CALFED to locate many of these types of habitats will be in the North Delta, potentially with a disproportionate amount in Solano County. The restoration of shallow water habitats is a major objective of the ERP, and as such, it is likely that fringe areas of the Delta, such as eastern Solano County, will be prime areas for land acquisition. The current land use in the area is exclusively agriculture. We are concerned with the economic and land use impact these land conversions could have on Solano County. The current level of detail provided in the Draft EIR/EIS is inadequate. The inadequacy is so significant that it prevents Solano County from understanding the possible scope CALFED's impacts. We request that estimates of proposed land use conversions be identified in the Final Draft EIR/EIS as to location-by-County. Estimated land use conversions could be expressed as ranges, if that is necessary, but that would be better than the current paucity of information as to geographic location. These estimates should be identified for categories such as wildlife friendly agriculture, lands removed from agriculture for habitat restoration, lands needed for levees and water conveyance or storage. Solano County has worked hard to preserve agricultural lands through local land use restrictions and is very concerned about the potential impact of the ERPP and other CALFED program elements on the agricultural land base.

Solano County Board of Supervisors

Ltr#: 01363 7

Based on our position that the conversion of agricultural lands for habitat restoration results in significant environmental effects, Solano County requests that CALFED consider mitigation measures that would reduce these impacts to insignificance. These measures might include consideration of undertaking investments in the following types of projects; irrigation projects to intensify agricultural production in the Montezuma Hills, agricultural land preservation programs near urban areas threatened by conversion during the CALFED implementation period, such as funding the purchase of conservation easements in the Suisun Valley (near Fairfield), agricultural drainage improvements in the Dixon area in support of more intensive high value agricultural production.

The economic impact analysis falls short in several regards. By folding in economic impacts in a large diverse region, the serious impacts are concealed. Certainly the removal of 64,000 acres of agricultural land in Solano County will have a major impact on farmgate production there. But the agricultural infrastructure of Solano transports and processes product from within the entire delta region. Reductions in tomato harvests will likely adversely affect the tomato processing plant in Dixon. Reductions in wheat and corn will adversely affect supplies for General Mills in Vallejo. Will reduced production in the Delta make dredging the channels less important for the maintenance of access to the Ports of Sacramento and Stockton, both of which serve Solano farmers?

The EIS/EIR does not adequately address the economic impact of the proposed massive land conversions on all components of the agricultural economy - production, processing, transportation and marketing - within the regional economy. Rather, very serious impacts are masked by pumping impacts together with all the economic sectors in an economically diverse region.

Agricultural production and processing provides at least 50% of the industrial base of Solano county. The EIR must contain a complete analysis of the economic impacts, including stresses on processing and infrastructure, of the program on this county.

South Delta Water Agency

Table 5.2 lists most of the proposed conversions of farm land to ecosystem storage and conveyance benefits. There is no analysis of the consequent reduction in food production, or the water needed to replace that food production elsewhere, or the effect on levee maintenance assessments, etc. There is also no analysis of the increase in water consumption by the new wetlands as compared to existing agriculture on those lands, or from what other use this increased water demand would be taken) Throughout the DEIS there appears to be a tendency to assess feasibility and impacts based on present populations of humans and exotic species. The analyses should clearly address the conflicts that will result when these populations reach the level that can be expected at the end of the 30 year planning period.

Yolo County Board of Supervisors

* Adopt a variety of social assistance programs, including: (1) Compensate local governments for increased demand for services resulting from labor displacement; (2) Compensate workers displaced by specific transfers through such actions as augmenting unemployment insurance benefits; (3) Provide training and educational opportunities for unemployed individuals to reenter the workforce, job referral and placement services, and job training; and (4) Implement cost-sharing and other financial assistance to reduce the social/employment impacts potentially resulting from the cost of the Water Use Efficiency and Water Quality Programs.

Although laudable, welfare programs are not an adequate replacement for the social stability and financial benefits of a vibrant and established agricultural economy. Moreover, the significant economic impacts created by the CalFed program will significantly impede our existing efforts to help people leave welfare and reenter the workforce.

Yolo County Board of Supervisors

The EIS/EIR fails to point out that the local agricultural service industry provides goods to areas outside of Yolo County and will be adversely affected by the regional economic disruption proposed by CalFed.

Yolo County Board of Supervisors

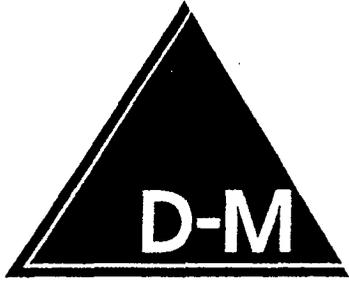
The EIS/EIR states that overall economic impacts within the Sacramento Valley will not be significant, since expected losses represent 1% of total revenues (EIS/EIR, pp. 8.6-13, 8.6-14). This does not take into account the fact that the Sacramento metropolitan region represents a disproportionately large share of the regional economy. In Yolo County, on the other hand, approximately 7.5% of the labor force depends upon agriculture. Farm production and associated activities account for about 19% of total gross revenues. A UC-Davis study of the effects of the 1991 water banking program estimated that the transfer of 151,000 acre-feet from Yolo county reduced farm income 5% and increased agricultural unemployment 4.7%. Rural areas in the Sacramento Valley that are still dependent upon agriculture, such as Yolo County, will suffer a substantial economic impact as a result of CALFED policies.

Based on the above analysis, the Bay-Delta Program will have profound and potentially dire consequences for the future quality of life in Yolo County. The CALFED Program appears to be a vast transfer of wealth from Northern California to Southern California, which will be largely paid for by those who will be least able to afford it. The programs analyzed in the EIS/EIR should be extensively revised to eliminate the widespread inequities that are being proposed.

Yolo County Board of Supervisors

As stated earlier, CALFED has included programs to "cooperatively manage" between 355,000 and 380,000 acres of agricultural land to enhance wildlife benefits.

The EIS/EIR concludes that these management practices will not have a significant impact on agriculture (EIS/EIR, p.5-8). The County strongly disagrees with this assessment. Although these lands will not be permanently converted to nonagricultural uses, the proposed management practices will result in reduced crop yields, which will decrease economic multiplier effects for the local economy.



GAP

NOTED

* Pay fair market value for any crops destroyed or taken out of production on private or leased lands as a result of project construction.

Acquisition should also include payment for future lost income. Existing farmland has a potential to generate revenue year after year, which will be lost once it is converted to habitat. The economic impacts of agriculture conversion will not be a one-time event, but will continue beyond the life of the CALFED Program and acquisition should reflect this long-term loss of farm income.

ALW

Alex Hildebrand

Ltr#: 00017 4

The proposal (such as on page 10 of Alternative Descriptions) still refers to "new water supplies" that will be "purchased from willing sellers" in the San Joaquin Basin. By calling these acquisitions "new supplies" the analyses avoid any review of the impacts caused by reallocation of this water. The DEIS does not even address the physical feasibility either now or with the forecasted future population of restoring the proposed flows while also protecting third parties and avoiding redirected impacts. Refer to my March 25 letter to Sunne McPeak with attachments and copy to you.

California Farm Bureau Federation

Ltr#: 01383 5

Cal-Fed has proposed several options that can redirect agricultural water to other uses and therefore result in a significant effect on the environment. Most notably, it appears that the ecosystem and water quality programs will require significant amounts of agricultural water to meet their goals and visions. Additionally, it appears that Cal-Fed will rely extensively on the transfer of agricultural water to urban uses. In all cases, the redirection of agricultural water to other uses is a significant effect on the environment and must be fully analyzed in the PEIS.

California Farm Bureau Federation

Ltr#: 01383 6

The water transfer common program is the most visible effort to redirect agricultural water to other uses. At this time the program is conceptual in nature and therefore difficult to specify the amount and type of water that will be transferred. Nonetheless, the PEIS must make an effort to look at transfers under the program and analyze the potential effects in detail. The transfer of water will have a significant effect on the environment and the rural areas from which water is transferred, varying with the type of transfer. There are three basic types of transfers that must be analyzed for each region, including: (1) the fallowing of agricultural land, as previously discussed, (2) increased water efficiency or water conservation and its effects on downstream water users and related agriculture, and (3) the substitution of groundwater to replace transferred surface water and its effects on the groundwater resources and the attendant agricultural resources. Cal-Fed must make a choice on this issue. If water transfers are going to be a common program, then Cal-Fed must fully (not selectively) analyze the potential impacts. Otherwise, water transfers should be left out of the Cal-Fed process completely.

California Farm Bureau Federation

Ltr#: 01383 8

Finally, the Cal-Fed conjunctive use (groundwater storage) program has not been adequately analyzed in the PEIS, despite the significant effects that this program may have on groundwater rights, which are part and parcel with agricultural land. We have previously provided detailed comments on the conjunctive use program and how it can adversely affect water rights held by farmers and ranchers. The bottom line is that groundwater storage may have significant effects on agricultural resources that must be analyzed in the PEIS. (See Kings County Farm Bureau V. City of Hanford (1990) 221 Cal. App.3d 692, 728.)

Community Alliance with Family Farmers

Ltr#: 01753 20

The issue of how to treat so-called third party impacts has been a particular concern of the work group CAFF supports the options listed for addressing third party impacts. The final Draft EIR/S should reflect the adoption, in some form of the following options: a) Defining third party impacts and the limits of acceptable impacts; b) Limits on land fallowing and water transferred from any given area; c) A mitigation fund for transfer impacts funded by a tax on transfers; d) Strict limits on groundwater substitution; e) On-going monitoring for environmental and economic impacts; f) A "Clearing House" for information on amounts, locations, and impacts of transfers.

Northern California Water Association

Ltr#: 01508 56

The Draft PEIS/EIR underestimates potential land use impacts resulting from water use efficiency actions (page 5-5). This assessment does not reflect an issue that has recently become more of a problem in certain areas of the Sacramento Valley: salt build-up in soils where recycled drain water is used for irrigation. This can have a negative impact on crop production, an obviously critical land use issue to farmers. In some areas of the Valley, it has been determined that the cost of recycling water and attendant negative impact on crops is greater than the traditional cost of pumping and returning water back to the river. NCWA supports the CALFED mitigation strategy (for soils and geological impacts) which proposes that the volume of irrigation water used is always sufficient to flush accumulated salts from the root zone.

Sacramento County Farm Bureau

Ltr#: 01474 2

It should be emphasized that agriculture thought the Delta Bay plays an important part in providing habitat and food for many species especially waterfowl. This fact is totally ignored in the Programmatic EIR/EIS.

ASI

Environmental Water Caucus

Ltr#: 01424 52

Under agricultural social issues the analysis fails to account for jobs that may be created by more intensive irrigation water management

National Audubon Society

Ltr#: 01747 22

* Under agricultural social issues the analysis fails to account for jobs that may be created by more intensive irrigation water management.

Reclamation District No. 2068

Ltr#: 01448 62

Under "Agricultural Social Issues" add that the Delta region will suffer a loss of jobs as agricultural lands are converted to ecosystem habitat.

Regional Council of Rural Communities

Ltr#: 01685 73

Section 8.1.5.6, Mitigation Strategies. CALFED states, "Strategies for minimizing the social/employment impacts as a result of agricultural land conversion include: continuing the flow of property tax revenues to the local communities. . . ." Please note that the proper wording should be "restoring and supplementing the flow of property tax revenues..."