

NRCS 1/20/00

Luana Kiger, 09:04 PM 1/10/00 -0800, Comments on Summary of Changes for CF draft Programmatic

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Subject: Comments on Summary of Changes for CF draft Programmatic EIS/EIR

Hello, Campbell, our comments are few.

The issue of how much agricultural land is being converted to what where is still unclear. I recommend a table that consolidates all of the acreages related to ag for all purposes. If we don't have one, people will continue to add on their own and get alarming figures. I thought I had it figured out, but got confused the more references I came across. I would reference that table every place where an individual reference to ag conversion is made. The string that I found (assuming I located all of them) is:

- section 6.2.7.1 page 9, third paragraph - 115,000 acres
- section 6.2.11 page 25, item L. - sounds like a potential type conversion, no acres
- section 7.1 item 14 - obtaining easements for temporary flooding, no acres (this could be worded to obtain voluntary management changes such as temporarily flooding, not just easements)
- section 7.1 about the third page, 4th paragraph - 353,933 to 388,933 acres seasonally flooded (same as above acres?)
- section 7.2 about the third paragraph - revenue loss of \$56 million to \$167 million a year due to ag conversions, no acres
- section 7.2 last paragraph - 75,000 acres more flooding
- section 7.2 2nd page (?) - 27,000 of the 34,000 acres which could be converted
- section 7.2 2nd page (?) - 300,000 acres of off season flooding and 5,000 acres enhanced
- section 7.2 2nd and 3rd pages - revenue losses of \$17 million to \$51 million for ERP (2nd page) and revenue losses of \$3 to \$9 million ERP (3rd page)
- section 7.2 3rd page - 15,300 more off season flooding
- section 7.3 revisions - 353,933 to 388,933 acres of flooding for ERP

So, what are we doing? And are the total potential revenue losses accurately stated? If a farmer doesn't farm what he used to, its a change if the land is fallowed, flooded, changed to pasture from crop, change in crops, under easements, under water permanently. This really needs cleaning up for understandability, and also for estimating what it is truly costing the Delta communities in terms of farm income, farm labor, and town infrastructure (i.e.. food processors, shippers, seed and equipment dealers).

The statement on CALFED cooperative planning process in the WQPP section 1225.21, et al, is good.

Luana