

Fresno County  
**Farm Bureau**  
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June 25, 2012

Ms. Janice Piñero  
Endangered Species Act Specialist  
Bureau of Reclamation  
Bay Delta Office  
801 I Street, Suite 140  
Sacramento, CA 95814-2536

Re: Concerns to be addressed in the Environmental Impact Statement for the Remanded Biological Opinions on the Coordinated Long-term Operation of the Central Valley Project and the State Water Project

Dear Ms. Piñero:

On behalf of the Fresno County Farm Bureau's (FCFB) 4,000 members, I am writing to express our concerns to be addressed in the Environmental Impact Statement (EIS) for the remanded biological opinions (BOs) on the coordinated long-term operation of the Central Valley Project (CVP) and the State Water Project (SWP).

Once again, San Joaquin Valley (SJV) farmers are faced with severe water restrictions that provide a 2012 water allotment of just 40 percent from the CVP. This decision has tremendous economic repercussions locally, as well as throughout the state and nation. This is especially troublesome when the projects are currently over 100 percent of their historical average.

The fact that SJV farmers have a significantly reduced water allocation to grow the food that feeds our nation, while reservoirs are near full capacity, highlights the impact of regulations on California's water infrastructure system and the importance of finding solutions in the Delta. It is estimated by water contractors that in just a six week period this spring, restrictions on CVP operations under the Endangered Species Act (ESA) cost south of the delta water users more than 180,000 acre-feet of water. This is enough water to irrigate 72,000 additional acres via increasing the allocation to 55 percent. In a county that still faces 15.8 percent unemployment, that additional water means additional jobs.

Fresno County's 1.63 million acres of fertile farmland produces over 400 different types of crops which contributed more than \$5.9 billion to the California economy in 2010 and supports 24.2 percent of all jobs in the area. Fresno County agricultural products are exported to 94 different countries around the world. Therefore, the BOs that produce CVP operational restrictions when the Reasonable and Prudent Alternatives (RPA's) are implemented result in impacts that are felt well beyond the agricultural industry and The SJV region.



According to the Berkeley Economic Consulting group's 2009 study, the initial Delta Smelt pumping constraints would have a \$500 million to \$3 billion annual impact on the California economy, depending on hydrological conditions. In 2008, when a 40 percent water allocation was implemented, there was a 65 percent full-time decrease in on farm employment and hundreds of thousands of acres were not farmed.

Also in 2009, a UC Davis report estimated 80,000 jobs were lost, over 350,000 acres were left fallow and there was a loss of \$2.2 billion in farm revenue as impacts were felt from the smelt BO alone. West side unemployment soared over that of the urban core. For many of those who work to harvest our food, the food lines became a staple during this period. These individuals were unable to work because the land lay fallow; they were unable to afford the produce that they would have normally been harvesting. Demand for social services increased while the cities and counties struggled to serve the residents due to the increased economic strain.

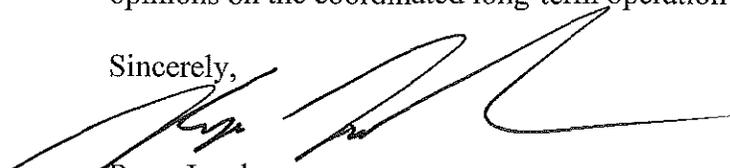
The effects of this year's 40 percent CVP water allotment are just beginning to become apparent. Preliminary estimates are that 85,000 acres have been left fallow. A continued lack of surface water deliveries due to restrictions places a tremendous strain on our already depleted ground water. A reliable surface water supply is the only way that we can begin to systematically replenish our groundwater.

There have been environmental impacts as well, as non-irrigated fields lay fallow. These open fields can often produce dust, negatively impacting the air quality in our region. Non-cultivated fields can also produce non-native plant species and noxious weeds that can have further economic impacts as additional work must be done to eradicate them.

These BOs have resulted in a tremendous amount of human and economic impact without a correlating improvement in species numbers due to operational restrictions. Scientists who have studied the Delta agree that there are numerous factors contributing to the fisheries' decline. In a recently released Public Policy Institute of California (PPIC) study entitled, *Aquatic Ecosystem Stressors in the Sacramento-San Joaquin Delta*, "flow regime change" was identified as only one of five broad categories of stressors. PPIC concluded "...maintaining the status quo appears to be the least likely avenue to successfully managing the Delta's native biodiversity." Yet, the federal agencies responsible for drafting the BOs that impact Delta pumping operations have failed to quantify or analyze these stressors. The EIS must analyze all of these stressors because it is clear that the status quo management strategy of simply curtailing water pumping has failed urban and rural water users, as well as the environment.

On behalf of FCFB and the growers I represent, thank you for the opportunity to submit comments and concerns that we would like addressed in the EIS for the remanded biological opinions on the coordinated long-term operation of the CVP and the SWP.

Sincerely,



Ryan Jacobsen  
CEO/Executive Director