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CITY OF RIO VISTA

September 21, 1999

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CALFED Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, Calif. 95814
Attn: Mr. Lester Snow

RE: Comments on the Revised Draft Programmatic EIS/EIR

Dear Mr. Snow,

Over a year ago the City of Rio Vista submitted its comments on the first Draft Programmatic EIR/EIS. We explained that Rio Vista with a population of 4,500 is the largest of the small cities in the heart of the Sacramento River Delta and that agriculture and the people and businesses that serve it is a mainstay of our local economy. We expressed a grave concern that the CALFED Bay-Delta Program as proposed would have a devastating impact on Delta agriculture by removing up to 200,000 acres from production.

We forecasted that the impact of the loss of this agricultural land would ripple into our small community, causing unemployment, closure of businesses, loss of tax revenues and an increase in the need for social services. Just looking at a handful of local retail businesses which serve agriculture, we estimated the loss of millions of dollars of retail sales annually. We said that this loss would translate into a loss of tax dollars which would have a direct and significant impact on the City of Rio Vista's ability to provide services to its residents, causing blight in our City and a threat to our quality of life.

We criticized the first Draft Programmatic EIR/EIS for concluding that the loss of thousands of acres of productive agricultural land would not have significant adverse socio-economic impacts upon the Delta region. We commented that the first Draft EIR/EIS analysis of regional economic impacts inadequately identified and assessed the magnitude of the socio-economic impacts on the City of Rio Vista and other smaller urbanized areas within the Delta region, such as Isleton, Walnut Grove, Courtland and Hood. Because the local economies of these small communities are heavily dependent on agriculture and do not have the economic diversity that the portions of Sacramento, Stockton and West Sacramento included in the regional study have, we said that "lumping" us all in together, masked the significant impacts to the more rural portions of the region. We expressed the suspicion that the failure of the first Draft Programmatic EIR/EIS to identify the socio-economic impacts as "significant" was related to the desire to avoid having to provide mitigation for these impacts.

Unfortunately, the Revised Draft Programmatic EIR/EIS does little to allay the concerns we previously expressed to you. While the document now states that somewhat fewer acres of agricultural land are to be converted for the CALFED habitat restoration, levee rebuilding and storage and conveyance programs (166,000) than originally forecast (200,000), this appears to result from no longer including acres to be converted by related projects such as the proposed North Delta and Stones Lake National Wildlife Refuges and the Yolo Basin Wildlife Area. These are projects which the EIR/EIS refers to in one place as "being carried out or proposed independent of the CALFED program" (7.1.6.1.), and in another as "outside or partially outside the Program." (7.1.10.) The City objects to the deletion of all or a portion of these related projects from the revised project description of the CALFED program. This impermissibly "fragments" the project description, permits the "related" projects to escape thorough NEPA/CEQA review, and results in the Revised Draft Programmatic EIR/EIS incorrectly and inadequately describing the CALFED project and its cumulative impacts.

The ownership of Delta agricultural land by public agencies and non-profit conservation organizations already stands at an astounding 51,350 acres or 11% of the Delta Primary Zone! CALFED and related projects risk reducing private property and agriculture to the point that the remaining Delta farmers and ranchers will not be able to continue, either because the surrounding habitat uses prove incompatible or because there is no longer a "critical mass" of contiguous agricultural land to support the necessary agriculture-related businesses and labor base. Whether the acreage to be converted is 166,000 or 200,000 acres, it portends a huge reduction in agriculture and profound impacts on the socio-economic status of the Delta Region.

So what does the Revised Draft Programmatic EIR/EIS propose as mitigation for these impacts? Little or nothing. In fact, the document is clear- these impacts are not "environmental" and, therefore, CALFED is not required to mitigate them. (7.2.2) If that is the case, then what comfort should the City take in the promise that "subsequent project -specific environmental analyses will evaluate these impacts in more detail?" (Ibid.) What good will it do to tell us precisely how many people will lose their jobs and how many businesses will disappear if CALFED declines to take any responsibility for it?

Elsewhere, the document suggests "possible methods of alleviating... adverse impacts" which include "supporting local governments and workers faced with increased demand for social services resulting from labor displacement; supporting training and educational opportunities, job referral and placements services, and job retraining for unemployed individuals to reenter the workforce; and providing opportunities for alternative industries to develop". (7.3.7.2) The City seeks a commitment to implement these methods of alleviating adverse impacts and urges that added to them be financial and technical assistance for displaced farmers to increase the value of projection on their remaining agricultural lands and to bring new lands into production. The City also advocates that economic development assistance be provided to Delta communities and residents to develop recreation and eco-tourism businesses consistent with the Draft Revised

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EIR/EIS's analysis that enhancing recreation may be one way to balance the losses from reduction in agriculture. (Ibid.)

Finally, we again recommend that the CALFED agencies consider working with the City of Rio Vista to establish a CALFED research and public education center in the City. Such a center would not only meet the needs of the program for continual evaluation ("adaptive management") and public information, but also to help our local economy. Situated on the Sacramento River, in the hub of the area planned to undergo habitat restoration, Rio Vista would be an ideal location.

In conclusion, the City of Rio Vista is extremely concerned with the health of the Bay-Delta system and commends the effort to find a cooperative solution to the many problems currently plaguing it. However, the City cannot support a plan which violates the central theme of CALFED ("we all get better together") and a key solution principle ("no significant redirected impacts"). No other region in the state will be as significantly impacted by the CALFED program as will the Delta. Therefore it is imperative that the EIR/EIS acknowledge and provide mitigation for the significant adverse socio-economic impacts it will have on the City of Rio Vista and the other small communities in "the heart of the Sacramento River Delta".

We look forward to your response to our comments and have every hope that you will be able to address our concerns.

Sincerely,

Fred Harris
Mayor

cc Senator Maurice Johannessen
Assemblywoman Helen Thomson
Solano County Board of Supervisors
Solano County Water Agency
Delta protection Commission
Solano County Farm Bureau