



January 16, 2007

Dale Hoffman-Floerke
Department of Water Resources
Colorado River and Salton Sea Office
1416 Ninth Street, Room 1148-6
Sacramento, CA 95814

RE: Draft Programmatic Environmental Impact Report (SCH #2004021120)

Dear Dale Hoffman-Floerke:

The Department of Food and Agriculture (Department) has reviewed the draft Programmatic Environmental Impact Report (PEIR) for the Salton Sea Ecosystem Restoration Program. We offer the following comments on the PEIR with respect to the project's impacts on agricultural resources.

The project is in response to legislation that directs the Secretary for Resources to undertake a study of alternatives to the restoration of the Salton Sea ecosystem. The PEIR outlines eight alternatives that include a variety of different components including: Air quality management, desert pupfish connectivity, a brine sink, a freshwater reservoir, a saline habitat complex and deep and moderately deep marine sea areas.

The PEIR does a good job of documenting the agricultural setting at the regional scale, as well as of the other land uses and local land use plans that could be affected by the project. On pages 11-36 and 11-38 (Table 11-4), the PEIR notes that up to 400 acres of agricultural land could be converted to sedimentation/distribution basins, depending on the alternative. The "no action" alternative and alternatives 1 and 2 would convert equal parts of Farmland of Local Importance and Farmland of Statewide Importance. Alternatives 3-5 and 8 would convert 200 acres of Farmland of Statewide Importance and 200 acres of "farmland designated as Other Lands." Alternatives 6 and 7 would convert up to 200 acres of "farmland designated as Other Lands." (Please note that the "Other Lands" category is defined by the California Department of Conservation as lands that are not farmland; this category should simply be described in the PEIR as "Other Land" not as "*farmland designated as Other Land.*")

Direct Impacts

On page 11-35 of the PEIR, criteria are set forth for determining the significance of the project's impacts on agricultural resources. The criteria used are those of the California Environmental Quality Act's Guidelines (Appendix G):

Convert Prime farmland, Unique Farmland, or Farmland of Statewide Importance; conflict with existing zoning for agricultural use or a Williamson Act contract; or cause conversion of Farmland, to non-agricultural use.

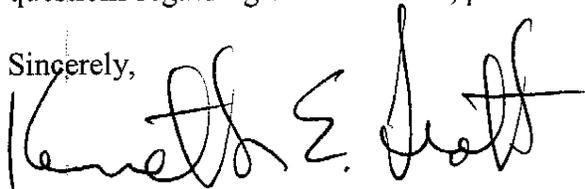
On page 11-36, the conversion of up to 200 acres of Farmland of Statewide Importance in Imperial County is described as being less than 1 percent of the County's total amount of Farmland of Statewide Importance. Other than this statement, we did not see an analysis of the significance of the project's impacts on agricultural land resources. This statement, however, infers that the impacts are considered to be less than significant. Also, conclusions made under the Cumulative Impacts Chapter (Chapter 23) indicate that a finding of "less than significant" has been made with respect to the project's direct impacts on agricultural land resources (although it is not clear whether this finding pertains to cumulative impacts or direct impacts).

Our uncertainty over the PEIR's finding of significance with respect to the project's direct impacts on agricultural resources stems from the document's discussion of "Next Steps" on page 11-48. In this section, it appears that it has been determined that the conversion of agricultural lands is a potentially significant environmental impact that will be analyzed during project-level environmental review.

We recommend that the CEQA finding regarding the significance of the project's direct environmental impacts on agricultural resources be clarified. Further, we recommend that the finding be documented by the quantitative approach to environmental thresholds of significance offered by the Land Evaluation and Site Assessment (LESA) model. The LESA model is set forth in CEQA Guidelines as an optional threshold for determining the significance of a project's impacts on agricultural resources. The LESA model provides for an objective, facts-based analysis of the specific agricultural lands being impacted, based on such factors as soil quality, parcel size and adjacent land uses. The Department of Conservation developed the California LESA model based on a similar model used by USDA for analysis of federal project impacts on agricultural resources. A LESA user's guide is available on the Department's website.

Thank you for the opportunity to review and comment on the PEIR. If you should have questions regarding our comments, please call me at (916) 657-4956.

Sincerely,



Steve Shaffer, Director
Office of Agricultural and Environmental Stewardship

cc: Stephen L. Birdsall, Agricultural Commissioner
Imperial County

John R. Snyder, Agricultural Commissioner
Riverside County