



CALIFORNIA FARM BUREAU FEDERATION

LEGAL SERVICES DIVISION

2600 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833 • PHONE (916) 561-5665

May 28, 2020

Via electronic mail: ajacobson@usbr.gov

Ms. Allison Jacobson
Bureau of Reclamation
Division of Planning
2800 Cottage Way CGB-700
Sacramento, CA 95825

Re: Notice of Intent to Prepare an Environmental Impact Statement for the Del Puerto Canyon Reservoir Project, Stanislaus County, California

Dear Ms. Allison:

The California Farm Bureau Federation (“CFBF”) is a non-governmental, nonprofit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. CFBF is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 34,000 agricultural, associate, and collegiate members in 56 counties. CFBF strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

Farm Bureau appreciates the opportunity to provide comments on the Bureau of Reclamation’s Notice of Intent to Prepare an Environmental Impact Statement for the Del Puerto Canyon Reservoir Project in Stanislaus County, California.

Ms. Jacobsen, there are a thousand reasons anyone can find to oppose a project. For a good project, however, with many regional benefits, there may also be good reasons to support it. In the case of the proposed Del Puerto Canyon Reservoir, CFBF believes the reasons in support of the project far outweigh the reasons to oppose it. On the positive side of the ledger, as described on the Del Puerto Canyon Reservoir website (<http://www.delpuertocanyonreservoir.com>)—and as



detailed and analyzed in an already completed Del Puerto Canyon Reservoir Draft EIR¹—the potential benefits are clear.

The project aims to capitalize on excess runoff during peak flow in California’s infrequent, but critically important big water years and major winter storms. In the case of the proposed Del Puerto Canyon Reservoir project, this amounts to an estimated average of 60,000 acre-feet a year—and up to a maximum of 82,000 acre-feet. The project is a collaborative effort that would benefit water agencies and water users in the Counties of San Joaquin, Stanislaus, Merced, Madera, Fresno, numerous cities, disadvantaged communities, the region and its economy as a whole. This includes 45,000 acres of irrigated agricultural land within the Del Puerto Water District and some 240,000 acres within the services areas of the San Joaquin River Exchange Contractors.

The proposed reservoir is an off-stream reservoir in the Coastal Range foothills near Patterson. It would store water now operationally and regulatorily available, but physically un-storable water due to lack of adequate south-of-Delta storage capacity. This supply would help to tide over farms, cities, and people in the region through dry years, and would help to buffer against the area’s large loss of historic dry-year groundwater supply as the result of California’s Sustainable Groundwater Management Act of 2014.

The project is consistent with the Delta Reform Act and the Delta Plan’s policies to advance the co-equal goals of water supply reliability and ecosystem health, of greater regional self-reliance, of wet-period ‘sip/gulp’-style operations, regional water portfolio diversification, drought and climate resilience, environmental multi-benefits, beneficiary pays principle, etc. It is also consistent in these respects with the California Water Resiliency Portfolio, the Water Infrastructure Improvement Act, etc.

The project could be constructed relatively quickly and economically, taking advantage of the natural topography of the proposed project site. The project partners, the Delta Puerto Water District and the San Joaquin Exchange Contractors (including Central California Irrigation District, San Luis Canal Company, Firebaugh Canal Water District, and the Columbia Canal Company) have a proven track record of effectiveness, creativity, and success in project implementation. The project would provide badly needed water resources, not to only farmers, communities, and the regional economy, but also for water-short south-of-Delta National Wildlife Refuges.

The reality in our state is this: Combining factors have left few options for vast tracts of the San Joaquin Valley—a unique agricultural region not just of regional, but statewide, national, and global stature and importance. Major challenges include California’s unpredictable

¹ Del Puerto Canyon Reservoir Draft Environmental Impact Report (“Draft EIR”), accessed May 28, 2020 at <https://www.delpuertocanyonreservoir.com/assets/pdf/reports/Del-Puerto-Canyon-Reservoir-Draft-EIR.pdf>.

hydrology, wicked politics, lack of investment in and proper upkeep of critical water systems over time. In addition, there are stringent, often onerous regulations—including significant constraints on operations of the state and federal projects and now, as well, the Sustainable Groundwater Management Act.

The proposed Del Puerto Canyon is a reasonable and fitting piece in the puzzle of the Valley's water future. Like all projects—and proposed reservoirs in particular—the proposed Del Puerto Canyon Reservoir project will have to overcome many obstacles before it can come to fruition. This includes permitting, technical and economic feasibility, and the objections of individuals often inclined to view a project, not rationally as an integral whole, but rather from the limited and often emotional vantage point of whatever looming threat they imagine it to represent. In the case of the Del Puerto Canyon Reservoir, and other critical water infrastructure projects like it, frankly, this type of the unreasoning 'everywhere nimbyism' does the Valley a great disservice. As shown in the Del Puerto Water District existing Draft EIR, it is untrue the project's potential significant impacts cannot be reduced to less than levels with mitigation.²

An environmental impact study must examine all potential significant environmental impacts of a project and address them wherever possible, as required by law. As noted, a project of this nature must overcome many barriers to implementation, address reasonable community concerns, and bear the cost of investment by the project beneficiaries. Provided that it can surmount all of these obstacles, however, there must eventually come a time for action. At that point, objectively, it *should* be possible to build a facility of this kind for the good of the region as a whole. At that point, there *should* be an end to constant tearing down of any and every attempt to progress on necessary water storage and water supply infrastructure.

Policy decisions of the last many years have effectively backed into a corner San Joaquin Valley agriculture, the Valley communities, and local economies dependent on the same. Without sufficiently reliable water, agriculture, the San Joaquin Valley's great economic engine cannot persist—or, at least, cannot flourish as in the past.

On the whole, the Del Puerto Canyon Reservoir is not a destructive or an unreasonable project. Quite the contrary, on the whole, it would appear a prudent and beneficial one. The operational principle and approach it represents is responsible and well-supported. For this reason, CFBF strongly supports the expeditious advancement of this important project.

CFBF thanks the Reclamation for this opportunity to comment on its Notice of Intent to Preparation an Environmental Impact Study on the proposed Del Puerto Canyon Reservoir.

² See Draft EIR at ES-3 through ES-7.

Ms. Allison Jacobson,
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Questions on these staff-level comments may be directed to the undersigned at jfredrickson@cfbf.com.

Sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line and a small flourish.

Justin Fredrickson
Environmental Policy Analyst