



CALIFORNIA FARM BUREAU FEDERATION

NATURAL RESOURCES AND ENVIRONMENTAL DIVISION

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August 23, 2006

Via Regular Mail and E-Mail (FlowPolicy@waterboards.ca.gov)

Karen Niiya
State Water Resources Control Board
P.O. Box 2000, 1001 I Street, 14th Floor
Sacramento, CA 95812-2000

***Re: North Coast Instream Flow Policy
Scoping Comments on Notice of Preparation and Environmental Checklist***

Dear Ms. Niiya:

The California Farm Bureau Federation ("Farm Bureau") is a non-governmental, non-profit, 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. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing over 88,000 farm families and individual members in 56 counties. Farm Bureau 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.

The Farm Bureau appreciates the opportunity to review the Notice of Preparation and Environmental Checklist recently released in relation to the North Coast Instream Flow Policy, prepared by your office in response to the requirements of Assembly Bill 2121 (Water Code § 1259.4), and to provide comments on that document and the scope of the Substitute Environmental Document ("SED") during formulation of the North Coast Instream Flow Policy. The following comments are provided:

1. *The SED should include an adequate description of the project.*

The SED should include a clear statement of whether and how this policy will apply to existing water right applications, to existing petitions for change, to existing permits and licenses, and to pre-1914 water rights and riparian rights.

2. *The SED should include an adequate range of alternatives.*

The Environmental Checklist identified no policy alternatives other than a policy alternative based upon draft "Guidelines for Maintaining Flows to Protect Fisheries Resources Downstream of Water Diversions in Mid-California Coastal Streams," developed in 2002 jointly by the California Department of Fish and Game and the National Marine Fisheries Service. The SED should include a range of reasonable policy alternatives, other than a policy based solely upon these draft guidelines.

3. *The SED should evaluate the project's impacts upon groundwater resources.*

The SED should evaluate the project's impacts to groundwater resources, including effects related to increased substitution of groundwater pumping to meet water demands.

4. *The SED should evaluate the project's impacts upon agricultural resources.*

The SED should evaluate the project's impacts upon agricultural resources, to include the retirement or fallowing of productive agricultural land.

5. *The SED should evaluate the project's impacts on surface water systems, including sediment transport, erosion and flood control.*

The SED should evaluate the project's impacts on surface water systems, including resultant effects upon sediment transport, riverbank erosion and flood control capacities.

6. *The SED should evaluate the project's impacts on utilization of surface diversions, including storage impacts.*

The SED should evaluate the project's impacts on utilization of surface water diversions, including seasonal adjustments to surface diversions and the storage impacts of reduced on-stream storage in favor of increase off-stream storage.

The Farm Bureau appreciates your consideration of the above, and looks forward to review of the SED when it is publicly released. If you have any questions or concerns in relation to these comments, do not hesitate to contact me by telephone directly at (916) 561-5667.

Very truly yours,



CHRISTIAN C. SCHEURING

CCS\mmm

cc: Tony Francois