

SACRAMENTO COUNTY FARM BUREAU

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May 30, 2008

Paul A. Marshall
South Delta Improvements Program
Bay-Delta Office
California Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

RE: BDCP EIR/EIS scoping comments

Dear Mr. Marshall:

The purpose of the Sacramento County Farm Bureau is to protect and promote agricultural production and operations in Sacramento County. In the attached letter dated October 24, 2007, we supported executive order S-17-06 and the Blue Ribbon Task Force's objective to create a vision and plan for a durable Delta.

In that letter, we stated that water exports must pass through the Delta. Farm Bureau emphatically opposes an isolated facility (peripheral canal). Any conveyance system that removes fresh water from the Delta would result in degraded water quality and irreversible environmental damage to the Delta as well as a tremendous negative impact to agriculture. It has been brought to our attention that the Bay Delta Conservation Plan (BDCP) is being developed to address negative impacts to fish caused by water exports from the Delta. The BDCP presents four options which describe modifications to conveyance of water through and around the Delta and establish a "primary habitat restoration zone" for each. It is our understanding that the habitat restoration zones are planned to become marsh and tidal marsh. In each of the four options, significant portions of highly productive farmland in Sacramento County, Yolo County, and Solano County are designated as "primary habitat restoration zone".

With the exception of Prospect Island, we are opposed to designating any farmland located in the North Delta and east of the Sacramento River Deep Water Ship Channel for conversion to marshland for the following reasons,

1. This part of the North Delta is organized into reclamation districts.

2. This part of the North Delta is devoted to intensive, high value agricultural production to include pear orchards, apple orchards, wine grape vineyards, and cherry orchards.
3. This part of the North Delta provides a significant amount of habitat for terrestrial animals and is important nesting and foraging habitat for the Swainson's hawk and other avian species.
4. This part of the North Delta does not include large tracts of land in public ownership.
5. This part of the North Delta will be the most resistant to the drivers of change being considered by the Blue Ribbon Task Force and should be preserved for agricultural production, recreation, and terrestrial habitat.

Reclamation districts operate to provide flood protection, drainage and in some cases, water to land owners within their boundaries. These districts are successful because all landowners need the same services. During winter and early spring months, reclamation districts try to remove every drop of water they can from within their borders. Water is the common enemy. Wetlands and cropland within the boundaries of reclamation districts cannot co-exist. Not only will there be conflicts concerning drainage, but wetland areas will increase groundwater elevations for surrounding neighbors, compromising the agricultural productivity of their lands.

The North Delta east of the Sacramento River Deep Water Ship Channel includes all of the Clarksburg Wine Grape Appellation. Within the Clarksburg Appellation, there are thousands of acres of highly productive vineyards designated as "primary habitat restoration zone" for all four options. In addition, the North Delta includes the largest and most productive Bartlett pear-growing region on the West Coast and produces more than half of all Bartlett pears grown in California. Apples, cherries, vegetables, seed crops, tomatoes, alfalfa, grains and other crops are also produced in the North Delta. Because the North Delta is such a highly productive agricultural area, the cost of acquisition and conversion will be billions of dollars. This is not a good area to convert to marsh.

The North Delta provides terrestrial habitat for many species of animals, reptiles, and birds which would be displaced by marsh. Where will the sandhill cranes go when there are no corn, wheat, safflower and alfalfa fields for foraging? Will the BDCP provide mitigation for Swainson's hawk, loss of farmland, and for all the other negative impacts? This will add tremendously to the cost of acquisition and conversion and because the loss of farmland, jobs and economic activity cannot be replaced, the North Delta should not be considered for habitat restoration in the BDCP.

Because the area is broken up into many small parcels with many individual owners, acquisition will be infeasible. There will be few willing sellers. In order to execute a successful BDCP, conversion should occur where acquisition is possible and affordable. In the North Delta east of the Sacramento River Deep Water Ship Channel, it will be impossible to acquire land in

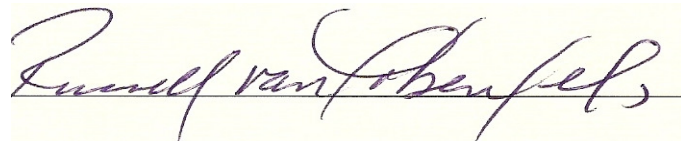
large parcels and impossible to convert any acquired land to marsh because during portions of the year, water is the common enemy in reclamation districts.

Finally, because the North Delta will be affected the least by the drivers of change, and because the State of California's Delta Protection Act of 1992 has already reserved the North Delta for agriculture, recreation and habitat, this area should not be considered for conversion to marsh. For all the reasons explained in the Delta Protection Act, this area will become increasingly important to the surrounding urban areas.

A credible BDCP will be a feasible BDCP. As alternatives are developed for further study during the EIR/EIS process, we urge you to remove the North Delta east of the Sacramento River Deep Water Ship Channel for consideration as "primary habitat restoration zone" and concentrate your efforts on the Yolo Bypass, Prospect Island, Liberty Island and the Lower Bypass. The Yolo Bypass area will require minimal infrastructure, can be connected to water north of Sacramento by using the toe drain, is subject to frequent inundation, and includes large areas of public ownership. Designating the Yolo Bypass area as the "primary habitat restoration zone" to help offset the negative impacts caused by water exports is feasible and credible for all four options under consideration.

Thank you for your consideration,

Russell van Loben Sels,

A handwritten signature in cursive script, reading "Russell van Loben Sels", is written over a light yellow rectangular background.

Vice President,
Sacramento County Farm Bureau

cc. Ms. Delores Brown, Department of Water Resources
Honorable Dan Lungren
Honorable Doris Matsui
Honorable Guy Houston
Honorable Mike Machado
Honorable Darrell Steinburg
Honorable Lois Wolk
Honorable Dave Cox
Honorable Alan Nakanishi
Sacramento County Board of Supervisors
Contra Costa County Farm Bureau
Solano County Farm Bureau
Yolo County Farm Bureau
San Joaquin County Farm Bureau

