



SACRAMENTO COUNTY FARM BUREAU

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September 30, 2008

Phil Isenberg, Chair
Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

SENT VIA EMAIL: dv_context@calwater.ca.gov

RE: Fourth preliminary staff draft of the Delta Vision Strategic Plan

The purpose of the Sacramento County Farm Bureau (SCFB) is to protect and promote the viability of agricultural production and operations in Sacramento County. SCFB understands the need to plan for the future of the Delta and the services it provides but continues to be very dissatisfied with provisions of the Delta Vision Strategic Plan fourth staff draft to protect Delta as a Place.

In the 1992 Delta Protection Act, the Legislature found and declared that “the Delta is an agricultural region of great value to the state and nation and that agricultural land of the Delta while adding greatly to the economy of the state, also provides a significant value as open space and habitat for water fowl using the Pacific Flyway, as well as other wildlife and continued dedication and retention of that delta land in agricultural production contributes to the preservation and enhancement of open space and habitat values.” For the past 16 years, preservation of Delta agriculture has been a focal point for Delta farmers and the state of California.

In prior comments, SCFB has recommended that Delta as a Place be a co-equal value. The fourth draft identifies the “...Delta region itself as a unique and valued Place. This is the third foundational leg of the Vision and the Strategic Plan.” (*reference: page 16*) Because the other two legs (reliable water and ecosystem restoration) are co-equal values and Delta as a Place is not, the foundation for the strategic plan is not adequately supported. Only three co-equal legs can support the foundation of the strategic plan. By making the Delta as a Place a co-equal value, there will be three co-equal goals driving water policy in California, a healthy Delta, reliable water and ecosystem restoration. **Decisions should be based on these three interrelated goals.**

To Represent and Promote Agriculture in Sacramento County

In order for the Delta as a Place to remain healthy, agriculture, which is correctly identified as “...the heart of the regional economy...” (*reference: page 17*) must be protected and be allowed to respond to market conditions and the drivers of change over time. Preservation of Delta agriculture must be a primary value of the strategic plan. Eco-system restoration and water conveyance projects must be designed in a manner so as to minimize and mitigate negative impacts to Delta agriculture caused by location and magnitude. Although the criteria list for selecting restoration areas (*reference: page 11 volume 2*) is a good beginning, there should be a similar list developed establishing priorities for preservation of agriculture. The list should include soil classification, crops grown, flood protection, water quality, and ability to resist the drivers of change. In addition, public ownership of Delta agricultural lands should be discouraged and land owner agreements, easements and other incentives should be used to provide public benefits where appropriate.

A healthy Delta is dependent upon adequate water quality both for agricultural production, maintenance of existing habitat and ecosystem restoration. “Meaningful revitalization of the Delta ecosystems requires improvement in freshwater flow conditions” (*reference: page 19*). The strategic plan needs to acknowledge that at times there may not be enough water to accomplish both better quality in the Delta and reliable water for California. Within the context of existing water rights and priorities, the plan needs to establish priorities and contingencies for insufficient Delta flows, and should consider conditioning the recommended dual conveyance strategy on adequate flows and or the construction of adequate storage both upstream and downstream of the delta.

Flood control, including upstream storage, levee improvements and levee enhancements are critical to a healthy Delta, ecosystem restoration and reliable water supply. Funding for levee maintenance and improvements must recognize that levees protect services, recreational opportunities, infrastructure of state, regional and local importance and environmental values, as well as land uses. The strategic plan provides for levee analysis and recommendations (*reference: page 42 and 43 volume 2*). The recommendations conclude with “Rest authority for levee priorities and funding with the CDEW Council...” Because levees are critical to all services provided by the Delta, the strategic plan should be more committed to maintenance and improvement of levees, and specifically add a recommended action by the appropriate parties to implement levee improvements and maintenance as soon as possible.

SCFB thanks you for the opportunity to comment on the Delta Vision Strategic Plan fourth staff draft, and encourages you to accept our recommendation to make Delta as a Place the third co-equal value.

With Regards,
Sincerely,



Ken Oneto,
President



Russell van Loben Sels,
Vice President

cc: Blue Ribbon Task Force
Sacramento County Board of Supervisors
Resources Secretary, Michael Chrisman
Director of Water Resources, Keith DeVore
Contra Costa County Farm Bureau
Solano County Farm Bureau
Yolo County Farm Bureau
San Joaquin County Farm Bureau
California Farm Bureau Federation