



CALIFORNIA DEPARTMENT OF  
FOOD & AGRICULTURE

A. G. Kawamura, Secretary

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August 4, 2008

Honorable Philip Isenberg, Chair  
Delta Vision Blue Ribbon Task Force  
650 Capitol Mall, 5<sup>th</sup> Floor  
Sacramento, CA 95814

Dear Chairman Isenberg:

**Subject: California Department of Food and Agriculture's Comments on the  
Second Staff Draft of the Delta Vision Strategic Plan**

The Department of Food and Agriculture (Department) has reviewed the second draft of your staff's proposed strategic plan for the California Delta and offer the following comments for the Task Force's consideration.

I commend the Task Force on the Delta Vision report you adopted last winter. It has provided a sound basis for the excellent staff work that is reflected in the draft strategic plan we reviewed. Overall, I believe that the draft plan responsibly and fairly addresses the Governor's priorities as set forth in Delta Vision Executive Order S-17-06. I also commend you for the open process by offering ample opportunities for stakeholder input.

The following comments are made up of two parts. First, I concur with comments made by panelists and Task Force members at your July meeting emphasizing the need for the Strategic Plan to address the sustainability of Delta agriculture more discretely, cohesively, and comprehensively. To achieve this, I suggest that under the goal "Delta as a Place", a strategy be added that specifically articulates the need to sustain Delta agriculture for its own intrinsic value as well as for the role agricultural can play in helping to accomplish the Vision's other goals.

Second, we offer edits and comments to the second draft. These detailed edits are conveyed to you as an enclosed "mark-up" version of the second draft strategic plan.



### A Strategy for Delta Agriculture

As I've pointed out in previous comments and responses to the Task Force, though Delta agriculture contributes a relatively small portion to California's total agricultural gross production value, it is nevertheless an important part of the State's agricultural portfolio. One of the key attributes of California's world-renown agriculture is its diversity of growing regions, each with its own unique combination of soils, climate, water and grower knowledge base. No other state -- and few nations -- has this diversity. This diversity benefits the diets of all Americans, but is also key to the prominent role that California agriculture plays in our country's international agricultural trade.

This diversity gives California agriculture its strength and resiliency in much the same way that species and habitat diversity is important to the stability and adaptability of natural ecosystems. The loss of California's unique growing regions, one-by-one, is slowly eroding that resiliency, just as the loss of a diversity of Delta habitats has resulted in the decline of native species.

Besides its uniqueness as a growing region, Delta agriculture is also worth special attention for its ability to consistently produce high quality and quantity crops, including several varieties that are primarily grown in the Delta. Delta agriculture also supports and contributes to the distinctive communities that the Task Force recognizes for their historical and cultural significance. As your vision also enumerates, Delta agriculture contributes other actual and potential services of public value, including incidental and created wildlife habitat, scenic open space, floodwater retention and carbon sequestration. As one commenter at our recently conducted "CaliforniaAgVision" listening sessions summarized, "Remember that food is just as important as the military in national security...."

For these reasons, I recommend that the Task Force consider treating Delta agriculture more deliberately as part of a discrete "Delta As a Place" strategy and urge the inclusion of the following:

*Strategy 13: Support Delta agriculture for its economic, environmental and social values, and as part of California's food production system. Using incentives, rewards, technical assistance, regulatory assistance, and research, support a Delta agriculture that is soil-building; creates or is compatible with wildlife habitat diversity; contributes to the management of floodwaters; improves water quality; sequesters carbon; improves flood protection; provides regional food security; and, where appropriate, produces value-added amenities to the Delta in the form of agro-tourism and recreation (e.g., hunting, fishing, wildlife viewing, etc.).*

*Action 13.1: Conduct a Delta-wide study similar to that done by the University of California's Agricultural Issues Center for Solano County ("The Solano Agricultural Future Project", 2007), where barriers to, and opportunities to improve agricultural sustainability are identified through economic analysis and stakeholder interviews. In addition to identifying challenges and prospects for Delta agriculture, this study would help to define the critical mass of agricultural activity that is necessary to support the services that, in turn, support a sustainable agriculture.*

*Action 13.2: Support an augmentation of the University of California's research and extension capacity in the Delta – as well as of the conservation technical field staff of the USDA's Natural Resources Conservation Service -- to support the development and adoption of agricultural management practices and crops that slow or reverse the loss of organic soils, improve water use efficiency and quality, improve the compatibility of farming with wildlife, and adapt agriculture to provide floodplain management services.*

Interviews conducted with Delta growers identified the need for increased technical assistance, particularly applied research that would help them adapt to the changing demands and constraints on Delta agriculture, from climate change to subsidence. (See "Delta Reflections: Voices of Delta Agriculture", posted on the Delta Vision website at: [http://www.deltavision.ca.gov/Context\\_Memos/Context\\_Memo\\_Ag.shtml](http://www.deltavision.ca.gov/Context_Memos/Context_Memo_Ag.shtml).)

*Action 13.3. Take a "working lands" approach to managing the Delta's landscape wherever possible. Such an approach would favor maintaining lands in private ownership with appropriate financial and technical incentives and rewards to manage lands to achieve the multiple goals of the Delta Vision Strategic Plan.*

For example, rather than purchasing and retiring agricultural lands from food production, as well as from the tax and reclamation assessment rolls, a working lands approach would provide incentives (payments etc.) to landowners to manage their lands in ways that also provide the public values sought by the strategic plan. These include, but are not limited to, habitat, floodplain management, subsidence reversal and carbon sequestration. Public investment in the alternative management of these lands for multiple public benefits could be protected, i.e., made durable, through the purchase of agricultural conservation easements using easement funding available from both state and federal sources. An alternative arrangement is exemplified at the Yolo By-pass Wildlife Management area where publicly-acquired land is leased back to growers for farming that is compatible with, or beneficial to the management of the area for flooding, wildlife, public recreation and education. The lease rates take into account the risks associated with depredation, unpredictable flood regimes, and other factors that can adversely affect agricultural profits.

*Action 13.4: Conduct analyses of potential restoration areas that also support high value agriculture to determine the potential to achieve habitat and water management objectives while maintaining the economic base of agriculture.*

The University of California's Agricultural Issues Center conducted a second study involving Solano County, a study of the impacts of Cache Slough habitat restoration and the County's agricultural economy. ("The Potential Impact of the Delta and Suisun Marsh habitat Restoration Plans on Agricultural Production in Solano County", by Kurt R. Richter, University of California Agricultural Issues Center, March 14, 2008.) The analysis involved an island-by-island assessment of habitat and agricultural value and found that, with strategic levee improvement investments, restoration needs could be met without converting the highest value agricultural islands out of agricultural use. Similar analyses should be conducted where restoration of Delta floodplains or habitats could result in the loss of high value agricultural lands.

*Action 13.5: Using methodology and classification schemes developed by the USDA and the California Department of Conservation, identify high value Delta agricultural lands, especially productive agricultural lands that provide or could provide incidental public benefits targeted by the Strategic Plan. Devise protection strategies that rely on the establishment of strategic agricultural preserves, and the supporting use of voluntary land use restrictions, such as transfer of development rights, agricultural conservation easements and the Williamson Act, to protect these lands.*

Urbanization threatens agricultural lands in the Secondary Zone of the Delta. Counties and cities should be provided incentives to increase the attractiveness of the Williamson Act for lands not under immediate threat of conversion. Agricultural land mitigation should encourage conservation (through fees, land dedication etc.) on lands under more immediate threat. In the Primary Zone, ranchette residential development poses a greater threat to agricultural land productivity than urbanization. To enable landowners to protect their property rights and preserve working farms and ranches, unique solutions will be required such as allowing the transfer of development rights from the primary Zone to appropriate developable lands in the Secondary Zone. The Delta Protection Commission is formulating strategies, working with local land trusts and other agricultural land use experts and interests, for the use of agricultural easements to protect Delta farmland. Execution of these strategies could be the function of the proposed Delta Conservancy, the Commission, or local land trusts. Regardless of the mechanism, agricultural stakeholders should be represented on the boards of the entities conducting easement acquisitions.

Another approach to the loss of agricultural land due to landscape fragmentation from ranchette development is to provide technical and financial support and incentives for intensive small-scale agriculture that lends itself to local, direct sales. Easements or the Williamson Act could be used to secure the use of smaller parcels for agricultural production of specialty crops to be marketed locally at farmers markets, produce stands,

schools and other institutions involved in feeding programs, and community-supported agriculture (CSA) subscriptions. (See Action 13.9)

*Action 13.6: Centralize or coordinate regulatory requirements on agriculture for actions or projects that further agricultural sustainability and the other goals of the strategic plan. A system of regulatory compliance that is nearly transparent to the grower should be developed in the Delta with an eye towards extending success statewide.*

The USDA Natural Resources Conservation Service has funded work by the nonprofit organization, Sustainable Conservation, as well as by resource conservation districts in a number of areas of the State to promote consolidated one-stop permitting by state, federal and local agencies of conservation practices that enhance agriculture and help to meet environmental objectives. Similarly, Yolo County is considering the establishment of an agricultural ombudsman to assist growers to navigate the regulatory and permit processes in order to encourage desirable value-added agricultural endeavors or practices. This kind of assistance was identified in the UC Agricultural Issues Center Solano County interviews as of high priority by growers. Frustration over having to deal not only with multiple agencies and regulations, but similar agencies and regulations of multiple counties (there are five Delta counties over which many farms span more than one) was often mentioned during the previously cited interviews of Delta growers conducted by this Department.

The Delta Protection Commission has been pursuing the establishment of a USDA-supported Delta Resource Conservation and Development Council, which could serve the role of a regulatory clearinghouse for Delta growers who seek to improve the sustainability of their farming, develop value-added products or activities, and improve the conservation of resources on their lands.

*Action 13.7: The Delta Protection Commission should continue to work with the USDA to seek approval of funding for a Resource Conservation and Development Council to promote natural resource-based economic development.*

Such Councils are made up of local elected officials, key agency leaders, resource conservation district representatives (there are seven such districts in the Delta) public members and others. If approved by the USDA, the RC&D council would be supported by USDA staff to conserve natural resources through the development of economic value from their use. RC&Ds in the Sierra Nevada play key roles as partners with the Sierra Nevada Conservancy and could do the same in support of the recommended Delta Conservancy, and as part of the National Heritage Area. RC&D Councils would be an ideal agency to access Rural Development grants and loans for agricultural value-added enterprises, as well as for community facilities.

*Action 13.8: Develop opportunities for agro-tourism and recreation in targeted areas of the Delta where the nature of agriculture and Delta infrastructure can support it.*

The recommended Delta RC&D should conduct an inventory and assessment of such areas and facilitate tourism and recreation development by accessing grants and loans, negotiating liability protection, and helping landowners with the necessary regulations and entitlements. Not all areas of the Delta are suitable for increased visitors because of inadequate or over-burdened roads, or the intensiveness of the agriculture practiced. Also, increased visitors are likely to result in increased crime, litter, and vandalism. The RC&D could negotiate with local jurisdictions for increased law enforcement and trash removal services as part of the increase in economic value brought to an area from tourism and recreation.

*Action 13.9: Create local, direct marketing opportunities for Delta agricultural products by supporting Delta labeling or branding; supporting the identification of the Delta as part of the Sacramento and Bay Area "foodsheds" pursuant to the concept being developed by Roots of Change and the American Farmland Trust; creating more farmers markets around the Delta, particularly at gateways; encouraging the creation of Community Supported Agricultural (CSA) direct farmer- to-consumer subscription networks; and, establishing Delta farm trails in cooperation with the Department of Parks and Recreation's Central Valley initiative. A Delta RC&D or conservancy could also work with growers, leveraging Farm Bill resources to create markets for growers in support of school nutrition programs or local food banks.*

Product branding and promotion must be initiated locally, but local growers and counties can seek the advice and support of this Department, county agricultural commissioners and neighboring growing regions that have successful local marketing programs (e.g., that of the Lodi-Woodbridge Winegrape Commission).

The American Farmland Trust and Roots of Change are working with the Cities of Oakland and San Francisco to establish boundaries of each city's "foodshed" (i.e., the agricultural area that is sufficient to supply the food needed by the respective communities). The concept includes community support of agricultural sustainability within the identified foodsheds, including conservation and marketing support. The idea of a local foodshed also includes the goal of reducing the carbon footprint of the community's food system.

Farmers markets are established locally, but are certified and provided technical assistance and quality control by this Department. Because of poor transportation infrastructure in the Delta, and the fact that the dominant agricultural use, acreage-wise, is the production of field crops, the opportunities for farmers' markets in the Delta are limited. Opportunities exist in the north and east Delta where row, and tree and vine crops are more common, and public access more amenable.

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The California Department of Parks and Recreation has developed a Central Valley initiative to bring park and recreation opportunities of the Valley up to par with those of coastal counties. The Department has identified the Valley's agricultural heritage, and, geographically, the Delta, as targets for public recreation and interpretation under the initiative. Working with the Delta Protection Commission, a Delta RC&D and the Delta Conservancy, the Department of Parks and Recreation should conduct an inquiry to quantify the level of willing farmers and ranchers who might support the development of farm trails and other farm-related educational and marketing strategies as part of this initiative.

The 2008 Farm Bill contains numerous programs to link growers with school and senior nutrition services and food banks. The Nutrition Title of the new Farm Bill also encourages purchases of locally grown foods by schools, institutions, such as public universities, and agencies, such as the Department of Defense, that have large feeding programs. A Delta RC&D could help Delta growers to develop new markets by serving as a clearinghouse for these Farm Bill, as well as other state and local food and feeding programs.

*Action 13.10: Support the transition of Delta farming from one generation to the next, or to new and young farmers through partnerships between a Delta RC&D Council or the proposed conservancy, and such organizations as the USDA Rural Development, the USDA Farm Services Agency and such private non-profit organizations as FarmLink.*

A crisis that has been facing agriculture in recent years is the increasing average age of the American farmer. The next generation of farming families is too often not interested in continuing with farming for a variety of reasons that include, but are not limited to land prices, regulatory burdens, and an uncertain future for California agriculture. At the same time, without inheriting the farm and its operating capital, it is difficult financially and technically for new and young want-to-be farmers to get into the business as landowners. USDA Rural Development, the Small Business Administration and non-governmental programs as FarmLink, provide financial and technical assistance for new farmers to get into the business. A Delta RC&D Council could serve as a clearinghouse for prospective farmers to learn about land availability, farm financing, and to gain knowledge about farming in the Delta. The proposed Delta Conservancy could provide the same service directly or working with an RC&D.

*Action 13.11: A Delta RC&D, local economic development or housing agency, and/or private non-profit housing organization should seek funding to develop agricultural labor housing in the Delta to support Delta agriculture.*

Growers identified sufficient and affordable agricultural labor as a need during this Department's interview of Delta growers for the Delta Vision Task Force. USDA Rural Development administers grants and loans to support on- and off-farm housing for

agricultural labor. The RC&D or another more appropriate agency should facilitate the application of these and other funds to develop housing within the Delta for farm labor.

*Action 13.12: Provide incentives, perhaps through the use of the Williamson Act or special forms of conservation easements for the designation in local general plans of sufficient land in and around the Delta for the development of agricultural support industries.*

Sugar beets are no longer grown in the Delta because of the lack of processing facilities. One farm support businessman interviewed as part of the Task Force's "Voices of Delta Agriculture" interview project, said that his business is slowly leaving the Delta due to loss of agricultural land. The UC Solano County study cited earlier noted the loss of agricultural support industries due to the absence or lack of appropriately zoned and priced land around the Delta. The need for support industries should be identified (see Action 13.1) and the Delta Protection Commission should work with counties to zone sufficient land specifically to serve the needed agricultural support industries.

### Summary Comments

In addition to the suggested new strategy for sustainable agriculture, I recommend that the concepts contained therein be integrated throughout the strategic plan, particularly the "working lands" action item. For example, Actions 4.1 and 5.3 call for the restoration of as much tidal marsh and floodplain habitat as feasible. These actions should be better quantified, but also tempered to incorporate the notion of working lands, private landowner stewardship approach to the extent feasible.

The Department recently convened a series of "California Ag Vision" listening sessions around the State, including in urban areas. The sessions were well attended by a broad cross-section of stakeholders from environmentalists to traditional agriculturists. The testimony was constructive, but also passionate. A few of the common themes expressed that I hope will inform your planning process, follow:

1. A stable and reliable water supply is paramount to developing our water supply policies.
2. There must be investment in California's water infrastructure to keep pace with the state's population growth. Investments in conveyance; legal and physical improvements to facilitate a water transfer market that protects our groundwater and agricultural water rights; and, investments in both ground and surface water storage to increase flexibility and resiliency of our water system are all priority investments.
3. Water use efficiency for agriculture must be carefully defined on a regional or even farm level. The definition should take into account soils, prior investments in conservation, climate, cropping patterns and beneficial uses of farm water not dedicated strictly to crop production. The definition should include groundwater

recharge, wetland wildlife habitat, salt management, and such practices as post-harvest flooding for disease control and wildlife habitat.

4. There must be recognition of the past (and continuing) strides that that agriculture has taken on its own volition to conserve water. This voluntary investment is a large reason why the California Water Plan projects relatively small future gains in water supply from investments in agricultural water use efficiency.

Finally, I understand that at the Task Force's July meeting there were questions about the viability of the California Agricultural Water Management Council. Let me assure you that the Council is alive and kicking, continuing to develop district-level water management plans. Its work has slowed, but only because of the diminishment of funding that was initially dedicated to it by the State. I encourage you to invite the Council's leadership to testify to you on ways to make the most of its capacity to further agricultural water conservation.

As I've previously noted, we have suggested other, more detailed edits to the draft strategic plan. These edits are contained in the enclosed draft plan mark-up.

Thank you for the opportunity to provide you with early input on the staff draft Delta Vision Strategic Plan. Please contact me if you have any questions or need further information.

Sincerely,



A.G. Kawamura  
Secretary

Enclosure

cc: Mr. Mike Chrisman, Secretary, California Resources Agency  
Mr. John Kirlin, Executive Director, Delta Vision Blue Ribbon Task Force



## ENCLOSURE

### SUGGESTED EDITS ON THE DELTA VISION STRATIC PLAN

Second Staff Draft dated July 11, 2008

Edits by the California Department of Food and Agriculture

The following detailed comments are intended to be consistent with the proposed strategy set forth in this enclosure's cover letter. We have provided edits at the executive summary level, but they are intended to be applied to the goals, strategies, action and performance measures of the main narrative of the plan, as well. We have offered a few comments to the specifics on the Plan's main narrative that were not spelled out in the 14-page summary of the draft Plan.

1. Page 1: The second paragraph speaks of the first two recommendations as being "especially central." The first numbered paragraph refers to water supply and ecosystems as being co-equal goals. This can be confusing to readers; i.e., are the co-equal goals paragraphs 1 and 2 or water supply and ecosystems? We suggest three co-equal goals.
2. Page 3, Goals: Clear lines of responsibility is an important goal, but perhaps an even more important goal for those who live in the Delta and rely on its water is not only the avoidance of redundancy or conflicting regulations, but streamlining them for organizations and individuals who take actions that benefit the goals of the Delta Vision and its strategic plan.
3. Page 3: We suggest that the CDEW establish as a function among one of its entities, a permit, and technical and financial assistance clearinghouse. For Example, Yolo County has been considering an agricultural ombudsperson to facilitate value-added agricultural ventures and compliance with county permits.
4. Page 3, Action 1.3: This paragraph should include agricultural land protection in addition to ecosystem enhancements. The Conservancy should have both objectives in order to seek out opportunities to protect multiple resources of interest with single easements, or to seek out protection of private working lands in ways that help achieve other resource goals in addition to a sustainable agriculture.
5. Page 4: Performance measures should include the length of time and cost that it takes for private landowners to accomplish actions consistent with the Strategic Plan.
6. Page 6, Goal 3: "Create a diverse mosaic of habitats and ecosystem processes, including wildlife compatible agriculture
7. Page 6: Consistent with edit above, Strategy 4 should include the incorporation of compatible agricultural uses in restoration projects, and the incorporation of compatible habitat on agricultural lands via incentives and easements, where possible.
8. Page 6, Action 4.1: This action needs to be better defined or quantified. Limiting the acreage of possible working lands conversion in order to sustain agriculture in the Delta will be difficult if every acre of tidal marsh that is physically feasible for restoration is restored. Also, we recommend including language that promotes integration of restoration with agriculture wherever feasible.

9. Page 6, Action 5.1: Add a sentence to end of this action that states flow modification will seek to avoid impacts on the sustainability of agriculture.
10. Page 7, Action 6.5: Again, there needs to be better definition than "wherever feasible." Also, on agricultural land there are several opportunities for wetland treatments: Tail water return ponds, sediment basins, and, through USDA's Wetland Reserve (easements/long-term agreements) Program, set-asides of marginal agricultural lands for wetland habitat.
11. Page 7, performance Target Schedule: Add the following indicator: Acres of high value farmland converted or (conversely) integrated into ecosystem actions.
12. Page 8: Add indicator: Acres of working lands contributing to restoration.
13. Page 9, Action 7.4: There should be some recognition here that in many agricultural water or irrigation districts, and on many farms regardless of district, there have already been significant gains in water use efficiency; i.e., not all agricultural lands are starting from the same base in terms of efficiency.
14. Page 11: Add Performance Target Schedule: Number of water use efficiency assessments and plans conducted and implemented.
15. Page 12, Goal 1, amend: Increase recognition of the Delta as a place of cultural, environmental, and economic value to the People of California.
16. Page 12, Goal 2, amend: "Enhance tourism and recreation (where appropriate to the agriculture being practiced), sustainable and multi-functional agriculture, and the local economy.
17. Page 12: See our suggestion for a strategy dedicated to sustainable agriculture offered in the cover letter for these edits. The following edits are consistent with our recommendation for this new strategy.
18. We suggest adding a sidebar that defines "sustainable" using the "three E's" definition.
19. Page 12, Strategy 11: Amend this strategy to indicate that agricultural landscapes will be integrated where feasible; especially where incentives and easements can be used to gain a form of agriculture that complements the objectives of the corridors.
20. Page 12, Action 10.5, amend: Create market structures or incentives for a sustainable Delta agriculture to produce public benefits in addition to, and compatible with the production of food and fiber. (See our recommended Agricultural Strategy in the cover letter for detailed structures and incentives that should be considered.
21. Page 13, Action 11.2: "state interests" should include Prime Farmland and Farmland of Statewide Importance as defined by the Department of Conservation's Farmland Mapping Series. Some of these SAMPs should be dedicated to supporting the maintenance and establishment of needed agricultural support services and industries, such as processors.

22. Page 13, Action 12.1: This action should include the use of flowage easements on areas important to floodwater management that incorporates agricultural uses during non-flooding periods, and that compensate landowners for loss of crop choice when floodplain function dictates such restriction in crop types.
23. Page 14, Performance Target Schedule: Add "Acres of agricultural land being managed for multiple services as working landscapes; i.e., lands that provide food and fiber as well as carbon sequestration, wildlife, food seasonal accommodation, etc."
24. Page 14, Performance Target Schedule: Add "Increase in net production value and direct marketing opportunities" as an indicator of economic sustainability.
25. Page 14, Performance Target Schedule: Establish agricultural preserve strategy based on an inventory and identification of priority high value lands (either as food producing lands or multiple public benefit lands, or both), and the use of agricultural conservation easements, the Williamson Act, Farmland Security Zones, and Transfer of Development Credits.
26. Page 17, paragraph 2: The Public Advisory Group should include agricultural expertise that draws from the County Agricultural Commissioners, UC Cooperative Extension Service, Resource Conservation Districts and/or agricultural water agencies. Similarly, on page 18, the Council should include membership that has knowledge, experience and/or expertise with agriculture given the dominant role that this land use now plays, and will continue to play per the Vision. On page 23, the discussion of the CDEW Plan's functions should include promoting a sustainable California agriculture.
27. Page 24: With respect to Action 2.2, the CDEW Plan should address affordable housing for agricultural labor as an element of agricultural sustainability.
28. Page 25, Strategy 3: Financing based on revenue generated by water use should factor in the public benefits that the use provides in return. Besides food and fiber, of which 75 percent is consumed domestically, California agriculture provides, and can be provided pricing incentives to provide more, multiple public values that we've enumerated previously. The Williamson Act is a good model where landowners receive tax breaks in return for long-term commitment to keep land in agricultural and compatible uses instead of development.
29. Page 26, number 3: An exception should be made when the funding is to help a water rights holder come into compliance with regulations, or add public value to their operation.
30. Page 32, first bullet under Action 4.2: Increasing the number of years that the Yolo Bypass floods could limit the ability to farm in the Bypass, which is the kind of farming that we have held up as multiple public benefit farming. The potential for this limitation should be noted in this bullet if appropriate.
31. Page 39, next to last paragraph under Strategy 6: the statement that "all have a substantial impact on living organisms" in reference to a number of pollutants, should be qualified. Not

much is known as to the extent some of these pollutants contribute. More research is needed in the case of some of the agricultural pesticides.

32. Page 44: Add a last bullet on Integrated Water Management Plans, calling for greater incentives for the development of watershed-based plans that link upper to lower watersheds, and that include agricultural water users in the planning process.
33. Page 46, Action 7.4: Water use efficiency needs to be defined for agriculture. Not all "wasted" agricultural water is wasted, but provides habitat and groundwater recharge benefits, as well. An approach to agricultural water use efficiency needs to be place-specific.
34. Page 47, second bullet under Action 7.4: Consider relying on USDA Natural Resources Conservation Service-certified water conservation plans to qualify growers for exemptions under various RWQCB regulations. Similarly, NRCS and SWRCB should collaborate on use of grant funds for improved agricultural water quality; i.e., SWRCB grant funds could support monitoring and outreach activities for projects funded by NRCS Environmental Quality Incentives Program (EQIP) cost-share funds for water conservation. Similarly, the state could work with local IRWMP groups to apply for NRCS Conservation Innovation Grants (under EQIP) to promote more regional, innovative water conservation strategies.
35. Page 53, Action 8.3: The DWR Floodplain Corridor Protection Program, that relies on conservation easements to protect floodplains, floodplains that are also used, and can continue to be used most years, for agriculture, should be mentioned as part of this Action item. A similar approach using easements could be made to protect high-valued lands for groundwater recharge (last bullet, page 56).
36. Page 56, top of page bullet: For your information, CDFA is working with the dairy industry and the University of California to research and support the implementation of BMPs for dairies to reduce both air and water quality impacts.
37. Page 58, first paragraph under Action 8.8: Another benefit of improving upper watershed infiltration through improved pasture and meadow management is an evening out of stream flows throughout the year. The Red Clover Creek restoration and grazing management work in the Feather River watershed is an example of this.
38. Page 69, Action 10.4: It should be pointed out that there is much research that is needed before soil carbon sequestration can be considered seriously for carbon credits and as a source of grower revenue. This research should be recommended as a priority in the Plan.
39. Page 78, second paragraph: Include CDFA in the list of agencies that must collaborate with respect to emergency response and planning.
40. Page 79: When re-building or setting back levees, consider redundancy in roads to create roadways that can be dedicated to agricultural users versus those that serve as main thoroughfares for other travelers in the Delta.