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Via First-Class Mail & Email
dv context@calwater.ca.gov

Hon. Philip Isenberg, Chair; and Members
Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

Re: Comments on the Delta Vision Strategic Plan Fourth Staff Draft

Dear Chairman Isenberg and Members of the Task Force:

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 counties. Farm Bureau currently represents approximately 91,000 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.

Farm Bureau appreciates the opportunity to comment on the Fourth Draft of the Delta Vision Strategic Plan and its associated water quality and flow issues, and respectfully requests consideration of the following comments attached.

Thank you for the opportunity to provide our comments and concerns. We look forward to further involvement and discussion with Delta Vision on the development of the Strategic Plan.

Sincerely,

Kari E. Fisher
Associate Counsel

Justin E. Fredrickson
Environmental Policy Analyst

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VOLUME 1 COMMENTS

Vol. 1, 3:11	We dispute that the growing body of federal and state environmental laws and, more particularly, their application in the courts and in regulatory processes reflect "the broad support" of the effected public. In reality, water issues in California are arcane and difficult to follow or understand, even for members of the State's "water community." The public in general does not understand how decision making on water issues or application of the law affects their daily lives, the State's economy and expenditures of public monies, etc
Vol. 1, 4:7	The fact that a given average volume of runoff from snow or rain in the State of California has remained generally constant over time is largely irrelevant: The important thing is, not how much raw water falls upon, runs across or infiltrates down into lands, geologic formations and topographic features in California, but rather when, how, and how much of that water is captured, diverted, released and passed, the timing of these different interactions and interceptions, etc. This can, has in the past, and will continue to change over time. How policy makers decide to manage our State's water resources, what infrastructure we decide to develop (or not develop), to what uses we decide to put these resources and in what amount, are decisions that are within our power. While the State ends and begins with roughly the same amount of water, the outcomes of different societal choices can vary widely and do not force any one conclusion.
Vol. 1, 4:4-4:28	The text on water use focuses on changes in demand for consumptive use, including marked increases in urban water use and static demand, but greater productivity from agriculture per acre-foot of applied water. In reality, however, rivaling or surpassing the cities, much of the overall increase in demand comes from water set aside to benefit the environment. Some understanding of these trends and where they may ultimately take us is important. Were it not for current and growing environmental water requirements, meeting all of State's consumptive water needs would be relatively simple. Environmental water requirements, therefore, and not consumptive water use, are the most important driver of water demand in the State. The Strategic Plan must put this into its proper context.
Vol. 1, 5:10-5:15	In reality, we believe that the reach and extent of various problems in the Delta is quite variable and nuanced, depending on location, and, accordingly, proposed solutions should not be all-of-nothing proposition. We do not believe that merely because of the existence of certain problems, which may occur to a highly variable extent or not at all in certain areas, depending on the specific location in the Delta, that all problems are equally insurmountable or that all require sweeping changes in land use, management, existing landforms, etc.
Vol. 1, 6:6-6:10	The notion of "co-equal" objectives continues to present the problem of "apples and oranges" that some have alluded to. This is why it would seem critically important to articulate a specific, achievable level of desired

	progress in each area that simultaneously reconciles the second goal. Unfortunately, this has proven difficult in the past and will be no easier this time. In pursuing the "co-equal goals," policy makers must also not lose sight of other values and resources that have tremendous importance in their own right.
Vol. 1, 6:19-6:20	We do not believe any one interest should control governance. Rather, as a matter of general principle, it would seem that the governance structure should incorporate some combination of separation of powers and checks and balances, as elements that have served so very well in other areas of our government. Many conflicts and competing interests exist within society generally and, even more obviously, around water issues in California. The governance system must seek to ensure a self-regulated and self-sustaining, equitable balance of these competing interests.
Vol. 1, 7:16	As an alternative to "mandatory conservation," we believe voluntary and economic incentives provide the quickest and least painful route to realization of tangible water supply and ecosystem benefits. Targets and potential regulatory consequences may motivate behavioral changes. Without incentives and actual capital investment to help attain these targets, however, water users will lack effective motivation and practical means to act. Benefits of water efficiency can be public benefits and, therefore, justify public investment. If the public at large desires a flourishing ecosystem and a flourishing economy, yet continually balks and delays on investments in new infrastructure, then the State of California must 'step up' and invest in viable technologies to provide alternative means of achieving these benefits, at least partially or until more comprehensive solutions can take form. "Mandates" alone are insufficient. Furthermore, it is very important to recognize that there are significant physical and practical obstacles to maximal efficiency and, even with public invest and aggressive implementation, this tool alone is no silver bullet.
Vol. 1, 8:14	Inexorable change of the kind described highlights the near impossible nature of the task we have set for ourselves. The Endangered Species Act assumes the specific causes ailing a species can be addressed, resulting in recovery of that species. In reality, the endless complexities present in natural ecosystems constantly confound our best efforts. We continue to labor under this new myth, even as we accuse and endeavor to cast out the old ones. As the text states (page 3-4), "Facts are stubborn things." The quote is an apt one. While human beings routinely do so, it would nonetheless be boundlessly arrogant and naïve to believe virtually everything we believe we know today will not be, eventually, subject to change, revision or rejection. This caution must temper any of the Task Force's recommendations and dissuade it from foreclosing options in the future.
Vol. 1, 14:30-15:3	Land subsidence raises the profile of peripheral areas in the Secondary Zone of the Delta. Many interests have earmarked these lands for a variety of competing purposes: Urban, commercial, and rural residential development; intertidal, floodplain, and upland habitats; "sea-level-rise accommodation"; and agriculture,

	including high-value permanent crops, such as vineyards and orchards. Management strategies should seek to maximize the sustainability of agricultural lands in the Primary Zone by improving levees, but also by attempting to identify management practices and crop types, as well as potential new ecological services to slow, reduce, or eliminate the risks and impacts associated with long-term subsidence of such lands. In addition, long-term strategies must preserve agricultural land uses in the Secondary Zone and ensure greater compatibility with and protection from encroachment by competing land uses.
Vol. 1, 17:25-18:5	*"The Delta's unique soils, growing conditions, and farming traditions allow it to innovate in areas of agriculture such as carbon sequestration crops, subsidence reversal crops, wildlife-friendly crops, and crops for direct marketing... Though land forms and water quality conditions in the Delta will ultimately change due to sea level rise, earthquakes, or other forces, the Delta's traditional agriculture can remain robust..."* As noted here, the Delta's soils, climate, crop diversity, access to water, agriculturally based economy and culture, etc. make it uniquely suited for agricultural production. Indeed, agriculture faces significant environmental, natural resource, and regulatory challenges elsewhere in the State and the State can hardly afford to simply write off an entire, highly productive and bountiful agricultural area of the State. Just as the Task Force notes energy, water prices, and population growth will stress our economy, resilience and ingenuity in the future, it is also reasonable to assume that food prices will similarly increase. Over the long term, energy prices and greenhouse gas implications will make out-sourcing of food production an ill-advised approach. California growers must be afforded a human environment within which to remain productive. Existing farmland must be conserved and protected, not simply written off. With regard to adaptation, at least in concept, we find attractive the idea of an agricultural economy in the Delta of the future that is resilient, robust, adaptive, and innovative—and not a relic, a remnant, a vestige, a thing of the past. For such innovation and adaptation to truly occur, however, will require more than pleasant-sounding words: To plant the seeds for such a transformation would require deliberate creation of strong economic incentives, intensive investment in research, legislative direction, possible special designation, active management and large-scale, long-term planning. AB 32 is identified as one possible vehicle and the Strategy refers various other potential mechanisms. It is unclear to us in what degree the proposed Natural Heritage Area designation would further this goal, if at all. Farm Bill programs or an RC&D designation, as discussed in Strategy 2, are approaches that may hold some promise and should be studied further and actively pursued if found feasible and beneficial. (See separate comments on Strategy 2.)

	This said, we should be very clear that we are *not* proposing for the Delta a control-and-command, centrally planned economy that eliminates crop choice, masks market signals, or that stifles entrepreneurial initiative. Quite the contrary: Any form of government incentive should stimulate flexibility and personal initiative.
Vol. 1, 18:25-18:27	*"These restorations will take place over many decades and, in many cases, will not even require changes in current agricultural land uses."* In which instances will proposed habitat restoration activities not "require changes in current agricultural land uses"? What is the Task Force's vision and recommendation for a way forward in this regard? As stated here, the approach seems to assume a multi-decadal phasing out of agriculture throughout much of the Delta. What is the Task Force putting forth to ensure co-extensive preservation of and compatibility with existing agriculture, as opposed to amorphous transformation into something else, over the long-term?
Vol. 1, 19:8	Regarding the bullet "[v]iable populations of native resident and migratory species," what will happen if, as is quite conceivable, despite our best efforts, plans to achieve this fail? What is the Task Force's plan for this contingency? How can this distinct risk be addressed through adaptive management, confronted, and overcome without upsetting the apple cart and derailing any sustained and concerted effort extending up to that point?
Vol. 1, 19:12	Regarding the bullet that reads "Stressors below adverse effects levels," as we have commented previously, a more appropriate (and realistically achievable) goal that draws on alternative language from a prior draft is "Stressors below critical thresholds." We do not know why what appears to us a very reasonable recommendation in this regard was previously ignored, but we renew the recommendation in hopes that it be adopted at this time.
Vol. 1, 19:29-19:33	Just as important as freshwater flow and water quality, we see control of invasives and predators and the creation of good as opposed to bad habitat, as critical components in need of "intensive management." Regarding water quality, we note the reference to "homogeneity," but we must question, specifically, what the Delta Vision would recommend as a more desirable state and on what basis. More precisely, with respect to water quality, what does the Task Force propose to modify and does this square with human uses of the system? As noted, one of six "key characteristics" of "a thriving Delta ecosystem" is the "ability to provide important human services." Water supply from Delta channels and waterways is an "important human service." Water quality goals for species must square with the water quality needs of human beings and the Strategic Plan must spell out how this will occur.

VOLUME 2 COMMENTS

Vol. 2, Strategy 2.1	We are firmly convinced at this point that Delta-As-Place needs an actual *plan* to address how to keep Delta agriculture viable, alongside the 'co-equal' goals of water supply and a healthy estuary. We think the recommendations from the Secretary of Agriculture's letter dated August 4, 2008, are a good start and, while we see that some of the Secretary's recommendations have been specifically incorporated, there are many additional recommendations and details that we find still lacking. In general, the Draft Strategy Plan continues to skirt around the issue of *existing* agriculture in the Delta, speaking of tourism, of entry ways, of new parks and designations, of a new (as yet completely unproved) agriculture, based on carbon sequestration, incentives, wildlife-friendly agriculture, etc. We do not want to judge these things prematurely or suggest they should not be part of the mix and, possibly, even an important component of adaptation and sustainability over time. As this point, however, they are *not real*. What is real is the agriculture already existing as a dominant feature of the current landscape. The Strategic Plan leaves woefully unaddressed how proposed conveyance and habitat features will be reconciled with this landscape. From a long-term sustainability standpoint, it would seem Delta agriculture requires certain key requirements to remain viable: It requires access to water of suitable quality and quantity throughout the growing season, to grow crops without adversely impacting yields, limiting crop-type choice, or concentrating salts in soils. (In other words, to be useful to Delta agricultural users and others drawing water from Delta channels, the water must be available for diversion and must be maintained at a certainty level of salinity and cannot be excessively brackish or saltwater.). Long-term agricultural sustainability in the Delta requires land—and, specifically, as a long-term concern similar to the requirements of intertidal marsh and floodplain habitats that will become increasingly important over time, it requires land that is not imminently or foreseeably vulnerable to subsidence and permanent flooding. Lastly, the long-term future of Delta agriculture requires public as well as private investment in adequate and well-maintained levees to overcome the differential between acceptable flood risks and consequences on one hand and the land uses and economic values behind those levees on the other. Other important requirements of Delta agriculture include *not* being converted wholesale to various incompatible habitats for fish and wildlife, as well as a critical mass of surrounding farmland and associated services and privately owned land within the region to maintain a sound economic base.

	Unfortunately, beyond vague actions and initiatives with no clear means of implementation, the Strategic Plan leaves such basics hanging as large and pregnant question marks. In part, to be fair, it is probably too much to ask that the Strategic Plan to address these issues in any great detail. A strong commitment to the Delta agricultural economy and existing land uses, however, the broad strokes of an overall strategy, and a clear and decisive direction *must* be part of the Final Strategy—and, yet, in our view, as of Delta Vision's Fourth Staff Draft, these elements are sorely lacking. To remedy this situation definitively, we recommend the Task Force's Strategic Plan call explicitly for development of a California Delta Agricultural and Economic Protection and Integration Plan and for the creation of California Delta Agricultural and Economic Protection and Integration Program (CDAEPIP). Development and long-term implementation of such a Plan and Program could be assigned to a future Delta Protection Commission with strong and direct local representation and robust stakeholder participation (including, for example, landowners, local farm bureaus, land trusts, RCD's, and local reclamation districts). Aspects of implementation could be entrusted to a Delta Conservancy. The CDAEPIP could become part of the CDEW Plan (if such a plan, indeed comes into existence), with careful integration among the CDAEPIP, the Water Supply Reliability Plan, the Ecosystem Restoration Plan, and local land use plans within the larger plan. The Department of Food and Agriculture's current 'Ag Vision' initiative could be used as a springboard for a Delta Plan. In addition, as we have mentioned, Food and Agriculture Secretary Kawamura's letter to Delta Vision of August 4, 2008 provides a good starting point. At the same time, however, what one notices about the list of recommendations in even Secretary Kawamura's letter is that current options are, by a large, a patchwork that reflects the current lack of any unifying structure or approach to agriculture in the Delta. A formulation of intent by the Delta Vision Task Force that expresses a strong commitment to a long-term plan for Delta agriculture could provide that unifying element and blend these patchwork elements into some more integrated whole. The existing land uses in the Delta are, in implementation terms especially, as large an issue as ecosystem revitalization or water supply and, as such, they are deserving of careful and deliberate treatment, commensurate to the enormity of the challenge.

	Agencies that should play a key part in securing funding and articulating a durable agricultural vision include CDFA, the USDA and NRCS, local RCD's and County Agricultural Commissioners' Offices. In addition, however, other partner agencies, including DWR, the Resources Agencies, the Department of Conservation, and CDFG, should likewise commit to the protection and integration of Delta agriculture in the overall plan.
Volume 2, Strategy 3.4	22:13-22:15 *"In the late summer and fall of critically dry years (about one year in ten) flow requirements that create more variable conditions should result in salinity intrusions to the Delta. . . ."* 22:39-22:43 *"From an ecosystem perspective, flow targets are achieved far more 40 effectively through approaches that reduce the amount of water diverted in, from, and upstream of the Delta, by providing alternate supplies, conservation, increasing efficiency, retiring marginal agricultural lands, recycling, reuse, desalination, conjunctive use of surface and groundwater supplies, regulatory re-allocation, and market mechanisms. . . ."* 23:16-23:23 *"[S]pring Delta outflow 21 should provide an approximately 10-50% increase in the percentage of unimpaired 22 runoff realized as outflow in most years, compared to the percentage experienced 23 during the 1990 – 1999 period. . . ."* 24:20-24:23 *"[I]n the fall following below normal, above normal, and wet years, the requirements should provide two months between August and November with Delta outflows between 1.5 to 3 times those during the 1990s reference period. . . ."* 24:29-24:32 *"The SWRCB should revise its Vernalis flow objectives and the export criteria for 30 the Central Valley Project (CVP) and the State Water Project (SWP) to provide 31 for net positive (i.e., downstream) San Joaquin River flows between February 32 and June by 2012 with implementation by 2015. . . . Measures include the average total San Joaquin inflow . . . (for example 20% in the near term, 50% in the longer term). . . ."* 25:1-25:4 *"[P]ulse flows are 2 needed between September and November. Each pulse flow should last 7 to 14 days. One or two pulses should be provided. Pulse volumes, as measured at Vernalis, should be in the range of 2,000 to 3,000 cubic feet per second. . . ."* The statements excerpted above from Strategy 3.4 ("Restore Delta flows and channels. . . .") highlight several of

	the reasons we believe Delta Vision and the current Strategic Plan effectively abdicate on the co-equal goal of a reliability water supply (for either in-Delta use or Delta exporters). Mandating flows of this magnitude would appear to have the result of completing defeating Delta Vision's stated "co-equal" goal of a reliable water supply. We recommend the Task Force direct the Department of Water Resources to model the water supply impacts of what it is proposing and transparently disclose the results to the public. This will provide a much better basis upon which to decide whether these recommendations represent a prudent recommendation for the use of water resources in our State.
Volume 2, Strategy 3.5	*26:7-26:10 "For municipal and agricultural water uses salinity and organic carbon reduction are critical. . . ."* *27:18-27:21 "[R]elocating intake facilities or modifying the flow of water within the Delta to effectively draw water from flowing Delta channels improves the quality of drinking water and agricultural export supplies while reducing direct ecosystem impacts. For example, relocating the current Central Valley Project (CVP) and State Water Project (SWP) south Delta intakes to the Sacramento River near Hood would reduce bromide in exported water to approximately 5% of current levels. . . ."* *27:23-27:26 "Changes to Delta conveyance systems and the effects of climate change will have an impact on the reliability and water quality for those with intakes located within the Delta. Investing in additional alternative intakes for these users can provide further flexibility in helping change the pattern of diversions to when and where least harmful to the environment. . . ."* *27:40-27:45 "Relocate as many of the Delta drinking water intakes as feasible to channels where water quality is higher and away from sensitive habitats. The North Bay Aqueduct and the Contra Costa Water District intakes should be relocated in the near term, with State and federal south Delta intakes relocated upon completion of the current environmental planning processes. The cost of these actions must be borne by those who benefit. . . ."* The emphasis throughout the section appears to be on export water quality and large drinking water intakes in the Delta. As Delta Vision's *Status & Trends Report* document and numerous other documents have highlighted, virtually every channel and slough in the Delta is lined with hundreds of small private diversions. Although, as a mitigation measure, it might be possible to relocate or modify such diversions in certain targeted areas or, perhaps,

	to provide a separate hook-up to an external source, it is definitely *not* feasible to relocate all or even a substantial fraction of all of these diversions throughout the Delta. As noted elsewhere herein, to remain viable over the long term, Delta agriculture requires an acceptable (relatively low) level of salinity throughout the growing season *in every year.* In salinity and water quality terms, the heterogeneity praised throughout the document as well is, potentially, quite detrimental to irrigation as a legally designated and protected beneficial use of water in the Delta. For these reasons, Delta Vision or, more likely, a follow-up process must contemplate ways in which such adverse impacts can be avoided or lessened. Operations, operable barriers and other potential mitigation measures provide one means of doing this. Relocation of diversions or external hook-ups are another. Lastly, monetary compensation or other assistance provides an additional last resort means of offsetting such impacts. Unfortunately, with its repeated references to salinity intrusion, etc., the Strategic Plan leaves the issue of in-Delta water quality unresolved—or rather addresses the issue by not addressing it. Deferring and shrouding this issue in ambiguity, as the current and each of the preceding drafts has done, is the surest way to ensure that it will come back. The State of California must find some more equitable and definite way forward on this issue.
Volume 2, Strategy 3.5	26:2-26:23 *"Salinity variability between fresh to brackish conditions during periods necessary to meet life history requirements of broad range of desirable aquatic species (+)"* Unless this metric can be reconciled with protection of irrigation as a legal beneficial use of water *within* the Delta, we object to its inclusion. We also question the measure's efficacy and scientific basis, at least until the underlying hypothesis has been more rigorously tested. Furthermore, performance measures related to Delta Vision's "co-equal" water supply reliability goal and water quality for both exports and in-Delta sources of water are prominent omissions from the list of proposed performance measures in this area.
Volume 2, Strategy 4.1, 29:32-29:22	*"[O]pportunities to improve the efficient use of water exist, but often they do not currently result in water savings available for other uses. . . ."* *"Water not physically used by the plants generally returns to the groundwater or surface water systems. . . ."* *"[M]any easier opportunities to use water more efficiently have already been adopted. . . ."*

	"Agriculture has much broader value than simply producing food and fiber. . . ." *"Any change in agricultural practices will affect both farm workers as well as the communities in which agriculture is a large factor. . . ."* As evidenced by the statements above, there are kernels of truth in this discussion and this is appreciated. Typically, however, these more positive reflections on the agricultural sector are immediately contradicted and undercut, in point-counterpoint fashion. It may be that this is simply an attempt at balance and presentation of various 'pros' and 'cons.' This is understood. In general, however, what we suggest is that Delta Vision and the State of California move past a polarized view of this issue and instead move on to the methods and approaches that will enable sensible and achievable advances in the area of water efficiency, while at the same recognizing and validating practical limitations of such a strategy. A fruitful approach will be a balanced approach that is grounded in reality, that respects the integrity, inventiveness and entrepreneurial autonomy of the State's growers, and that is not couched in unduly threatening terms or needlessly cluttered with unrelated issues.
Volume 2, Strategy 4.1	*30:1-30:4 "With emphasis on use of most productive lands and more effective irrigation equipment and management, California can still be as, if not more, productive with the crops we choose to grow and ensure that the state's agriculture contributes to the food and fiber needs of the nation. . . ."* *30:21-30:23 "In the past, efficiency improvements have sometimes been rejected or delayed because they were not deemed cost-effective given the profit potential of current crops and the relatively low-cost of water. Farmers have been unable to justify the expense given these constraints."* To the extent these statements paraphrase the basic premise of a recent advocacy piece by the Pacific Institute, we question many of the assumptions and conclusions in that report. Among other things, we dispute that crop shifting to permanent and "high value" crops, or other efficiency measures described in the report, are the panacea the report would lead its readers to believe. This is a broader debate that will occur and is occurring. However, we caution the Task Force against too readily adopting the referenced report as settled and undisputed fact.
Volume 2, Strategy 4.1	*30:27-30:29 "This strategic plan requires accelerated investments by individuals, communities, industry and farming to reduce both today's water demands and that of generations to come. . . ."*

	*31:18-31:25 "**Require DWR to provide funding for new incentive-based programs to promote the widespread and mainstream adoption of aggressive water conservation**. These may include concepts such as (1) creating market mechanisms for water quality improvements associated with reducing surface return flows from farming operations, (2) developing "carbon credits" for water utilities for reduced greenhouse gas emission associated with water conservation, and (3) allowing local tax incentives for new communities that meet aggressive conservation criteria."* In general, we believe an approach that provides strong, positive incentives to undertake voluntary improvements in efficiency can potentially reap substantial benefits. In addition, we believe the public benefits potentially associated with increased water use efficiency justify substantial public investment in this area. While we fundamentally dispute that efficiency alone can substitute for necessary investments in new storage and conveyance to meet future demand, we do agree that there is significant potential in the area efficiency. Aggressive public investment, in the form seed money, grants and public cost-shares over roughly the last two decades has had tremendous success in the area of groundwater management and conjunctive use at the local and regional level. In fact, this is one of the few success stories for which the defunct CALFED program can take at least partial credit. This precedent in the area of groundwater management and conjunctive management provides a success model for similar investment in efficiency (as well as recycling and other technologies). As opposed to simply laying the burden of increased efficiency at the doorstep of agricultural and urban water users, if the Task Force and the State of California wish and expect to see significant progress in this area, then the Task Force should add aggressive public investment in efficiency to the list of "critical elements" for Strategy 4.1. This is especially critical, as an interim strategy, while significant improvements to the State's existing infrastructure and measures for the environment remain stalled, remote, and highly uncertain for the foreseeable future.
Volume 2, Strategy 4.1	30:21-30:25 *"Change in agriculture's water use comes with costs. In the past, efficiency improvements have sometimes been rejected or delayed because they were not deemed cost-effective given the profit potential of current crops and the relatively low-cost of water. Farmers have been unable to justify the expense given these constraints. Avoiding efficiency improvements in the future, however, may be unrealistic given projected increased*

	costs for water. . . ." The greatest constraints on greater private investment in agricultural water efficiency are not, as the text suggests, the low value of the crops grown or the low cost and abundance of the water used to grow those crops. Crop choice obeys many factors, including physically limitations of soils and local growing conditions, standard agronomic practices (such as crop rotation) and, perhaps must importantly, market signals. As for "inexpensive water," increased urban demand, excessive regulation, significant limitations of the State's existing infrastructure, and the mandates of the Endangered Species Act have, in many areas of the State, conspired to made cheap and abundant water a thing of the past. And, as for the argument that improvements and technologies that water users cannot currently afford will somehow become *more* affordable when they must also pay *more* for water, quite frankly, the argument is quite backwards. Rather, it seems it should be fairly self-evident that perhaps the most significant barrier to more private investment in efficiency (aside from various practical and technical constraints that may make it infeasible in the first place) is the marginal cost of an increment in efficiency that is typically the decisive factor for a grower in any year that grower might choose to make such an investment (assuming, again, that such an improvement in fact feasible). This, then, is the reason more public investment in water efficiency, in the form of grants, incentives, technical assistance, etc., is the most effective way to increase private investment in implementation and development such technologies.
	29:32-29:39 *"In regions that import Delta water supplies, opportunities to more closely match what is applied with what the plant needs can result in real water savings."* The water requirements of agriculture go beyond the minimum amount of water required to produce a crop in a given year. In some cases, with more efficient irrigation methods, water use may in fact remain flat, although yields may increase. Many areas supplement surface water with groundwater, and so, reducing the availability of surface water can have adverse effects on groundwater. Farmers may shift to groundwater, at the same the recharge benefit of some less efficient methods of irrigation is lost. Farmers must rotate crops to maintain soil productivity, even though crops used for rotation may have "lower value" or consume more water. Many so-called "low-value" crops have added value, in point of fact, such as which alfalfa that is used as feed for dairies—and, in any case, the "value" of a particular crop depends on demand within the market, so nuts or fruits that were sky-high ten years ago could be ripped out a decade later. Field and row crops can be fallowed in dry times; "high-value" permanent crops cannot. Additionally, extreme efficiency and on-farm reuse can concentrate salts, again impacting the long-term productivity of soils.

Strategy 4.2	34:36-34:40 ***"Require DWR, local water districts and counties to ensure accurate and timely information is collected on all groundwater diversions in areas upstream, within and that receive exports from the Delta watershed and that such data is reported to the SWRCB."*** To be as sweeping it is, it is not clear how this recommendation will tangibly improve conditions in the Delta. As stated, the proposal is too general and simplistic to show that it is supported by any attempt to work through the many ramifications of such an approach or how it would work. Groundwater regulation has not been a significant element of public discussion in Delta Vision and it appears to relate to the Task Force's charge only obliquely, if at all. Given the current lack of detail, it is difficult to comment substantively on just what it might entail. In its current embryonic state, however, we strongly recommend withdrawing the proposal as a firm element of the Strategic Plan and recommendation of the Task Force. The recommendation provides a starting point for further exploration and dialogue, not a well developed proposal that would be broadly supported or that could be actually implemented.
Strategy 5.1	In general, this section is significantly improved over previous versions. It is action-oriented, appears to look for equitable and cross-cutting solutions to the extent possible, and it finally appears to recognize and affirmative call for out the need for substantial improvements to the State water infrastructure.