



Al Montna  
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Owner, Montna Farms

August 28, 2008

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Executive Director

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Executive Director  
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Karen Ross, President,  
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Kerry Tucker, CEO  
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Donald Valpredo, Owner  
Donald Valpredo Farms

Arlan Van Leeuwen,  
Owner, New Hope Dairy

David J. Wehner, Dean,  
College of Agriculture,  
Food and Environmental  
Sciences, CA Polytechnic  
State University, San Luis  
Obispo

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

Subject: California State Board of Food and Agriculture Comments on the Delta  
Vision Strategic Plan (Third Draft)

Dear Chairman Isenberg:

The California State Board of Food and Agriculture takes strong exception to the Delta Vision Strategic Plan because it is premised upon false assumptions about agriculture's role in the Delta, and in California as a whole, in addressing water rights, the public trust doctrine and beneficial use. As currently written, the Delta Vision Strategic Plan will imperil California's food security by discouraging private investment and the adaptive capacity of working farms and ranches to adjust to ordinary growing conditions and climate change.

We strongly object to the characterization of agriculture's lawful exercise of water rights as "archaic." This assumes that agricultural water use is a low priority in comparison to other beneficial uses and working farms and ranches are something of a legacy industry rather than a strategic resource that is important to California's economy, health and overall welfare. Recasting agricultural water use in this fashion implicates the Public Trust Doctrine and ultimately has a negative impact on private infrastructure investments (such as levees) that provide tangential public benefit (such as flood protection and habitat). Additionally, using the Public Trust Doctrine in this fashion discourages private investments in future sustainable farming and ignores the contribution and foundational investments made by California's working farms and ranches in the basic infrastructure of the Delta and to the statewide water system.

By dictating water use amounts, the Delta Vision Strategic Plan would deny working farms and ranches the ability to provide food, fiber, fuel, and habitat by eliminating the ability to adapt, not only local growing conditions but to factors such as global climate change. The science of farming is a practice closely tied to nature that does not lend itself to prescribed inputs by government. Similar experiments have taken place in the former Soviet Union and the People's Republic of China which regulated farming inputs and lost their ability to feed their own populations.



In summary, the California State Board of Food and Agriculture emphatically opposes the Delta Vision Strategic Plan's recommendations that are premised on flawed legal analysis and assumptions about agriculture's role in the Delta and the state. These misunderstandings of the natural processes that drive farming cannot promote government managed mandated limits to an input as basic as water. In order to reach our mutual goal of achieving a safe, reliable, and abundant water supply we strongly encourage you to properly characterize working farms and ranches in the proper context illustrating their critical, co-equal contributions to food security, energy independence, climate change, and habitat solutions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alfred Montna', written in a cursive style.

Alfred Montna  
President

cc: The Honorable Arnold Schwarzenegger, Governor  
Mr. Mike Chrisman, Secretary, California Resource Agency  
Mr. A.G. Kawamura, Secretary, California Department of Food and Agriculture  
Mr. Lester Snow, Director, California Department of Water Resources

