



Sacramento County Farm Bureau

8970 Elk Grove Boulevard Elk Grove, California 95624-1946
(916) 685-6958 Fax (916) 685-7125
sacfarmbureau.org

September 1, 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: Third preliminary staff draft of the Delta Vision Strategic Plan

Sacramento County Farm Bureau has replied to the first two Delta Vision Strategic Plan drafts and appreciates the opportunity to provide further comment.

Sacramento County Farm Bureau understands the need to resolve Delta issues with regard to ecosystem restoration and water exports. However, we and many other organizations and individuals remain very concerned that Delta interests (including Delta agriculture) are not a more prominent element throughout the third staff draft. The draft must be modified to better protect the interests of Delta residents. Even though the Vision and Strategic Plan both recognize the Delta's value, because protecting Delta values is subservient to the co-equal values of ecosystem restoration and reliable water, the Vision and the Strategic Plan make it possible to destroy the Delta to further the co-equal values. Within the strategic plan, there must be checks and balances to assure that the Delta as a Place and Delta agriculture will not be sacrificed to further the co-equal values. One way to resolve this conflict in the Strategic Plan is to make the Delta as a Place a co-equal value.

Recognizing that the Delta as a unique and treasured place is not enough--the Delta must be protected. Protection can be provided by performance measures which limit conversion of Delta agricultural land. Limitations might be expressed in total acres and/or by using a schedule of priorities such as location, ownership, soil class, levee infrastructure, and crops produced. Performance measures might be expressed as the number of acres converted from agriculture, or the number of acres by position on the priority schedule converted from agriculture with success measured against some total acre limitation. This type of performance measure should be applied throughout the strategies.

We recommend the following changes and two additional performance measures for Strategy 11, page 60:

Performance Measure	Modification	New Wording
1	Change	"Acres of agricultural land providing additional public benefits such as habitat, flood conveyance, subsidence reversal, and carbon sequestration."
3	Change	"Gross regional product from agricultural production."
4	Delete	
4	Insert	"Land in private ownership and under long-term agricultural easements."
5	Add	"Total acres in Delta agricultural production."
6	Add	"Acres of agricultural production protected by levees meeting PL 84-99 standards or better."

Under Strategy 11, bullet 2, page 61, we recommend the following two changes:

1) Change the highlighted sentence to read as follows:

"By 2010 and on a continuing basis, the California Department of Food and Agriculture, commodity boards, local governments and other commodity entities should identify and create market structures and incentives to ensure Delta agricultural viability and where compatible and where willing participants exist, produce public benefits in addition to food and fiber."

2) Add the statement below as sub bullet 6:

"Recognizing that agriculture is a market-driven, profit based business and that crop mixes, cultural practices and conditions in the Delta will change, Delta agriculture will need to and must be allowed to evolve and adapt to changing conditions over time."

With regard to Strategy 6, bullet 2, page 47, if restoring 15,000 acres of intertidal marsh accomplishes ecosystem goals, then the second 15,000 acres should not be restored. Further, Sacramento County Farm Bureau believes that if restoration of 30,000 acres of intertidal marsh by 2040 has not met ecosystem goals, it is inappropriate to convert as much remaining land of suitable elevation as possible by 2060. A detailed analysis determining why 30,000 acres has been unsuccessful must be performed before any additional restoration takes place, and any

additional restoration must occur within incrementally established limitations on lands in accordance with a priority schedule designed to protect Delta agriculture.

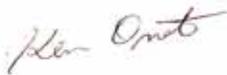
As we have stated in previous comments, Sacramento County Farm Bureau strongly objects to inclusion of Sutter Island and New Hope Tract in flood plain planning and ecosystem restoration (Strategy 10, bullet 1, page 58). Both islands are composed of highly productive, intensively farmed agricultural lands and have significant acreage in permanent crops such as pears, wine grapes and cherries (See attached map). In addition, the map shows that Sutter Island is not connected to Prospect Island and therefore, should not be part of a corridor restoration project which includes Prospect Island.

Concurrent with our support for Delta agriculture, we are opposed to any reallocation of water which is not firmly based upon the current legal framework and priorities of water rights. Furthermore, if there is a need for reallocation, then it must be assumed that there is insufficient water to meet current and projected demand. We support long-term solutions, which include water storage not reallocation. However, in the short and intermediate term, a well- functioning market for water transfers based upon economic incentives combined with the proposed regimen of through Delta export should be used to address water deficiencies.

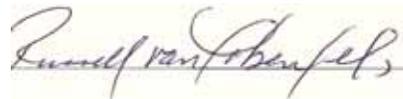
Thank you for this opportunity to comment on your draft. If you have any questions, comments or if you would like to further explore our suggestions, please contact us or Charlotte Mitchell, Executive Director at 916-685-6958.

We hope that the Sacramento County Farm Bureau comments have been helpful.

Sincerely,



Ken Oneto,
President



Russell van Loben Sels,
Vice President

Attachment: Map of the Delta Islands

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

