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Owner, Montna Farms

September 30, 2008

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Food and Environmental
Sciences, CA Polytechnic
State University, San Luis
Obispo

Mr. Phil Isenberg, Chairman
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 (Fourth Staff Draft)

Dear Chairman Isenberg:

Thank you for your gracious and thoughtful presentation at the regular meeting of the California State Board of Food and Agriculture on Wednesday, September 24, 2008. I am submitting these comments to the Fourth Staff Draft of the Delta Vision Strategic Plan at the recommendation of the California State Board of Food and Agriculture's committee on the Delta Vision. It is expected that these comments will be ratified at our next regular Board meeting on October 29, 2008. We have identified several gaps in the Delta Vision Strategic Plan and request that the Delta Vision Blue Ribbon Task Force address them before the strategic plan is finalized. The task force deserves credit for the draft and review process. Without it we would not be attempting to answer essential questions that have stalled progress over the past three decades.

We agree that the Delta's constraints are not only caused by natural factors such as drought and global warming, but that the most immediate impacts are driven by judicial orders and regulatory actions.

The Board recommends that the Delta Vision Strategic Plan include recognition of agriculture's strategic value to California and the nation as a resource – just like water, land and air. The strategic value of agriculture as a resource is rooted in its unique role of providing the nutritional needs of Americans. Unlike other parts of the United States, California agriculture fills this role with a near absence of federal subsidies in crop support. The prosperous and healthy lives Californians know would not exist without a healthy, reliable and affordable food supply. This is a fundamental fact that demands recognition in any strategic plan addressing water and land use.

You have often stated that the Delta Vision Blue Ribbon Task Force was assigned with the development of a strategic plan that agency secretaries must evaluate and ultimately implement. To ensure informed decision-making it is essential that the plan acknowledge deficiencies and disagreements regarding foundational and fundamental scientific premises behind plan recommendations.



The plan should identify mechanisms for validating such scientific premises or for augmenting scientific understandings. For example, we believe that the strategic plan must be augmented with scientific and technical evaluations that determine precise water demands related to plan elements affecting flows in and from the Delta; as well as how the interaction of various plan components would work in multi-year drought scenarios.

The Delta Vision Strategic Plan should directly acknowledge the underlying existence of water rights and area of origin statutes that must necessarily overlie the implementation of any plan. Suggestions that water should be reallocated pursuant to any provision of state or federal law should be accompanied by analysis of the economic impacts of such reallocations.

Farmers and ranchers are among the most efficient stewards of water in California, and are held accountable. Use of water for improvement of Delta habitat should be subject to the same beneficial water use standards as other users and judged according to measured effectiveness in meeting applied objectives. Measures that prove ineffective should not continue to receive water allocations.

We are concerned about the Delta Vision Blue Ribbon Task Force recommendations related to governance both from structural and economic perspectives. To the extent that you recommend any changes in the governance of water in California, the task force should first consider modifications to existing governance institutions rather than creation of new and separate institutions. Further, any proposed changes must assure that the parties paying for improvements or possessing water rights have clear and appropriate representation in the process.

We are glad that the plan's fourth staff draft recognizes that the gross per acre foot value of applied water in agriculture has increased (pg. 4). We would like to suggest that the final plan recognize in its narrative the value of agriculture's return rate of water to the environment in discussion of Goal 4. The final plan should clearly acknowledge the improved efficiencies achieved in applied water through implementation of new irrigation technologies over the past decades. Some third parties often make gross generalizations that agriculture uses 80 percent of the water in California. However, according to Bulletin 160-05 (State Water Plan update of 2005), in a normal year of precipitation (like 2000) the environment uses 48 percent, urban uses 11 percent and agriculture uses 41 percent of the state's dedicated water supply. This is important because without clear recognition of actual water applied to various stakeholder sectors it is difficult to explain why water use efficiency gains are best derived from some sectors instead of others as is the case in figure 11 on page 9 of your presentation.

We also call upon the Task Force to delete statements in the draft strategic plan regarding groundwater monitoring since it exceeds the scope of your planning mandate. The draft strategic plan does not make similar specific policy statements regarding urban conservation and other non-Delta specific water management topics.

Finally, the fourth staff draft of the strategic plan calls upon the Legislature to adopt it as a binding interim document by May 2009. We believe that such a recommendation is not advisable given the lack of science underlying many of the recommendations and in the absence of any technical analysis of how the plan would actually be implemented.

Again, we wish to thank you for providing a process that is open to public comment and analysis as we look for a long-term vision and plan for the Delta. We further compliment you for creating a process that invites rather than discourages a substantive and essential discussion of long ignored obstacles in fixing the Delta. We look forward to reviewing the fifth version and providing further comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Alfred Montna".

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