



Coalition for a Sustainable Delta

January 7, 2011

**VIA E-MAIL**

Phil Isenberg  
Chair, Delta Stewardship Council  
650 Capitol Mall  
Sacramento, CA 95814

**Re: Comments on Delta as a Place: Agriculture White Paper (December 6, 2010)**

Dear Chairman Isenberg:

The Coalition for a Sustainable Delta (“Coalition”) is writing to provide the Delta Stewardship Council (“Council”) comments on the December 6, 2010 “Delta as a Place: Agriculture White Paper” (“Delta Ag White Paper”). We understand that the purpose of the Delta Ag White Paper is to analyze past and current agricultural uses in the Delta for purposes of informing the Council’s development of the Delta Plan. The information contained in the Delta Ag White Paper is very helpful in explaining the role of agriculture in the region’s economy and ecology and we offer the following comments as the Council develops the comprehensive Delta Plan.

Fundamentally, while the Delta Ag White Paper addresses agriculture in the Delta region and encourages open space and agriculture within the Delta, the data presented do not accurately describe agricultural practices or economics within the “legal” Delta - the area that will be the primary focus of the Delta Plan developed and implemented by the Council. Most of the statistics cover the five counties whose boundaries extend into the Delta, but the data are not limited to the portions of those counties actually within the Delta. Therefore, it is difficult to get an accurate picture of what is happening within the “legal” Delta, which is what is most critical for development of the Delta Plan

We believe that the Delta Ag White Paper’s biggest flaw is that it fails to comprehensively examine the sustainability of agricultural practices within the Delta. However desirable agriculture and open space are within the Delta, the Delta Plan must incorporate sustainable activities, including a comprehensive examination of the economic and ecological sustainability of agriculture in the Delta. The challenges to sustainable agriculture in the Delta are many; we believe that the issues outlined below must be further investigated in order to develop the agricultural component of the Delta Plan:

- Much of the property in the Delta lacks surface water rights; this is an issue that has been raised before the State Water Resources Control Board on numerous occasions and is well documented in various reports, but action has been very slow to address the substantial number of illegal and unpermitted diversions that occur in the Delta. In addition, there is increasing use of groundwater as a substitute for surface water (likely because of quality concerns) to irrigate Delta agriculture in certain areas. Many of these groundwater basins are overdrafted, making this practice unsustainable. Consideration should be given to the source of water for irrigating Delta agriculture in development of the Delta Plan.
- Much of the water used to irrigate Delta agriculture is piped onto the Delta islands through unscreened diversions. Again, this issue has been documented in the past by the Department of Fish and Game and other State entities, but no action has been taken to address the impacts on fish species in the Delta as a result of the unscreened diversion facilities. It is hard to believe that water diversions from the Delta that are unscreened can be part of a sustainable agricultural industry and a restored Delta ecosystem.
- Many farming operations in the Delta return untreated runoff irrigation water containing both pesticides and excess fertilizer back into the Delta without any treatment. This is, again, a practice that cannot be considered sustainable. Although urban runoff and wastewater discharges into the Delta currently appear to be more toxic to the aquatic ecosystem than agricultural discharges, these untreated discharges contribute to poor water quality and diminished habitat value in the Delta.
- Decreasing land levels due to the oxidation of peat soils and compaction from heavy equipment also need to be considered within the context of a sustainable agricultural industry in the Delta. Although research indicates that soil levels can be improved with certain agricultural practices, these practices do not appear to be widely practiced within the Delta and may only be possible with certain crops. A detailed map survey of the Delta showing property currently being farmed that is significantly below sea level and the crops grown on those lands would be helpful in assessing agricultural practices within the Delta and formulating the agriculture components of the Delta Plan.

- The sustainability of agriculture in the Delta must also consider the protection offered by levees, which in many cases are increasingly susceptible to failure due to the fact that soil levels are increasingly farther below sea level. It is well documented that Delta levees have failed in the past and are increasingly likely to fail in the future. The cost of maintaining the levees in the future, especially if funded by the general public, may be a significant challenge that should be considered in development of the Delta Plan.
- The Delta Plan also needs to recognize those areas within the Delta subject to salinity accumulation as a result of past and current farming operations. Again, it may not be possible for these areas to be farmed sustainably into the future and this should be taken into account in the Delta Plan.
- The Delta Ag White Paper indicates that corn is a major crop in the Delta; to the extent that the corn produced in the region is subsidized under Federal agricultural subsidies, on property that is protected by levees whose maintenance also requires significant federal or State funds, continued cultivation of this and other similar commodities does not make economic sense. We encourage the Council to take a hard look at the economic sustainability of agricultural practices in the Delta in formulation of the Delta Plan.

The Coalition appreciates the opportunity to comment on the foregoing issues. We hope that these comments are helpful as the Council embarks on preparation of the Delta Plan.

Coalition for a Sustainable Delta



By: William D. Phillipmore, President