



DELTA CAUCUS

CONTRA COSTA - SACRAMENTO - SAN JOAQUIN - SOLANO - YOLO

June 13, 2012

Mr. Phil Isenberg
Chairman
Delta Stewardship Council
980 Ninth Street, Suite 1500
Sacramento, CA 95814

Submitted via email: deltaplancomment@deltacouncil.ca.gov

Re: Delta Plan, 6th Staff Draft

Dear Mr. Isenberg:

The 5-County Farm Bureau Delta Caucus appreciates the opportunity to comment on the Delta Plan, sixth Staff Draft. As the lead agricultural organizations that represent many of the Delta Farmers and Ranchers in the Primary and Secondary zones of the Delta, we continue to follow this and other efforts that have been generated as a result of the 2009 Legislative directives.

As with our comments on previous draft plans, members of the Delta Caucus rely heavily on the requirement that the Delta Plan provides a ***“more reliable water supply for California and restoring and enhancing the Delta ecosystem and does this in a manner that protects and enhances the unique cultural, recreational, natural resources, and agricultural values of the Delta as an evolving place (Water Code Section #85054).”*** In order to protect and enhance the important agricultural values of the Delta as an evolving place, the Delta Plan must clearly provide for the following:

- Land,
- Suitable quality water for irrigation,
- Flood control and drainage,
- Protection from Endangered Species due to newly created habitat, and
- Flexibility to change as conditions and markets readily change.

This is not meant to be an exhaustive list, but represent key issue areas that must be addressed for agriculture to be protected and enhanced. The text of the Delta Plan and its policies to advance the co-equal goals should be developed and implemented in a manner that protects, enhances and recognizes the values of Delta agriculture, while also allowing for agriculture to effectively adapt to changes over time – and thus avoids evolving agriculture out of the Delta. We have submitted comments responding to each draft, and we continue to have concerns that efforts to include our comments have not been made. **Please include as part of our comments, all of our previously submitted letters regarding all drafts of the Delta Plan.**

Comments on the Sixth Staff Draft

We acknowledge that changes have been made to the several drafts of the Delta Plan and offer the following comments regarding the Sixth Staff Draft:

1. **Chapter 4, Page 146, ER P1:** We support the concept of updating the flow requirements for the Delta, including for in Delta irrigation purposes. However, we are opposed to any policy that would allow flow objectives in the Delta to be negotiated without public input. We recognize that this will be a lengthy process, but it is one that should be required to be done in a public forum.
2. **Chapter 4, Page 148, ER P2-P4:** We are concerned with the policy that utilizes an elevation restoration strategy based on only one report. There must be opportunities allowed for new and emerging science to support the use of this strategy. Additionally, there is little description of the baseline restoration goals. It is cited that 160 years worth of change to the Delta has occurred, but is never qualified that this is the restoration baseline. Further there is little detail regarding the impacts to the habitat opportunity areas. How mitigation will be determined with Fish and Game, and whether or not that will allow for ongoing agriculture and protection from potential covered species. We again urge that all state-owned lands should be utilized first for habitat conversion as called out in DP P2. Additionally, we believe the DSC should develop an ongoing funding, maintenance and management plan for any newly created habitat.
3. **Chapter 5, Page 194 Policies:** We remain to be skeptical that a Plan of this magnitude will protect agriculture when there are no policies to do so. Use of the language “sufficient farmland” is another subjective phrasing that raises our concern that agriculture will be impacted, and it will be significant and unavoidable. There should be policies in place to work with landowners to plan for any disruption of agricultural operations. These farms and agricultural lands are integrated into individual business plans that no agricultural tourism model can support in off-setting the losses to the business. Additionally, these massive projects that will affect agriculture, should be phased to allow the project, whether habitat or other, to be evaluated for full efficacy before increasing the project development.
4. **Chapter 7, Page 249, Figure 7-2:** We believe this is a gross over estimate of what has happened and will happen in the Delta. There has never been a multi-island failure of this magnitude, nor has a levee breach occurred due to a seismic event. This fuels a scenario that unnecessarily heightens fear in order to persuade drastic measures. Seismic risk exists over many parts of California, and this could be illustrated in another, more reasonable manner.

Conclusions

The Delta Caucus understands the need for the coequal goals but remains concerned that the Delta Plan is still inadequate in answering a number of issues of importance for local agriculture’s protection and enhancement. Some of these continue to include:

- The protection and enhancement of Delta agriculture is not adequately addressed nor are the policies analyzed to determine if they will adversely and negatively impact Delta agriculture.
- The cost to develop and implement the plan will partially be borne by Delta agriculture and the costs will not be offset by the Plans' benefits.

Thank you for your consideration of our concerns shared by our five counties. We look forward to seeing these addressed in part or in whole in your next document. Should you have any questions, please direct them to Katie Patterson (209) 931-4931 of the San Joaquin Farm Bureau Federation.

Sincerely,



Russell E. van Löben Sels

Chairman

Cc: Contra Costa County Farm Bureau
Sacramento County Farm Bureau
San Joaquin Farm Bureau Federation
Solano County Farm Bureau
Yolo County Farm Bureau
California Farm Bureau Federation

Delta County Coalition
Delta Coalition

North Delta Water Agency
Central Delta Water Agency
South Delta Water Agency