



Al Montna
Board President
Owner, Montna Farms

September 2, 2010

Joshua Eddy
Executive Director

Kiran Black
Sacramento Valley
Walnut Growers

Delta Stewardship Council
650 Capitol Mall, Fifth Floor
Sacramento, CA 95814

Ashley Boren
Executive Director
Sustainable Conservation

Dear Chairman Isenberg and Council Members:

Donald Bransford, Owner
Bransford Farms

Enclosed, please find draft comments by the California State Board of Food and Agriculture on the Final Interim Plan which will be approved by the board at our September 22, 2010 meeting. The board strongly believes that the implementation of the Final Interim Plan should be guided by significant principles related to the Delta Plan Policy Objectives provided for in (Delta Reform Act, Water Code Section 85020).

Michael Darnell
CA Policy Director,
American Farmland Trust

Dan Dooley
Vice President,
Agriculture and Natural
Resources, University of
California

The board appreciates the opportunity to provide comments on the Final Interim Plan and looks forward to continued participation in the planning and implementation process. California's farmers and ranchers are a vital component to this state's economic and social infrastructure. Statewide water management must continue to recognize the important role California agriculture has in feeding the nation and world.

Luawanna Hallstrom
Partner, Oceanside
Produce & Collaborative
Communications

Thank you again for the opportunity to participate in this important process. If you have any questions or need further information, please contact me at 530-674-2837 ext. 12.

Craig McNamara
President, Sierra
Orchards

Sincerely,

Marvin Meyers
Partner, Meyers/Oxford
Farms

Adan Ortega, Jr.
Water Conservation
Partners, Inc.

Alfred G. Montna
President

Kerry Tucker, CEO
Nuffer, Smith, Tucker,
Inc.

Arlan Van Leeuwen
Owner, New Hope Dairy

David J. Wehner, Dean,
College of Agriculture,
Food and Environmental
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DRAFT COMMENTS ON THE DELTA INTERIM PLAN BY THE CALIFORNIA STATE BOARD OF FOOD AND AGRICULTURE

The following comments reinforce the state board's underlying beliefs concerning the Delta Reform Act's policy objectives (Section 85020):

- (a) *Manage the Delta's water and environmental resources and the water resources of the state over the long term.*

The Interim Plan should focus on the co-equal goals in the legislation that focus on the restoration of the Delta and water supply reliability in the Delta, areas upstream of the Delta and in the export areas. The interim Delta Plan is a key component of DWR's Water Plan Update for 2013 and Drought/Shortage planning process in so far as the achievement of the overall viability of the Delta as a water supply sources has been achieved, delayed, or complicated by unforeseen circumstances.

We support the Plan recognizing the imbalance in water supplies and demands from the Delta watershed, but urge the Plan to accurately state the way water supplies are managed in California. For example, the reference to eight times the average annual unimpaired flows is inaccurate and misleading (p. 2).

- (b) *Protect and enhance the unique cultural, recreational and agricultural values of the California Delta as an evolving place.*

Agriculture in the Delta is a component of a broad strategic resource for the state of California and the nation on par with clean water, clean air and open space for growing food and fiber and key to the culture of the area through early pioneers and immigrants who adapted its terrain to allow for farming. Given the potential loss of agricultural capacity in the Delta, the state will pledge financial and infrastructure resources by acknowledging the cultural heritage agriculture has provided to the region through any investments made in organized public spaces; and by helping remaining agricultural enterprises in the area comply with the Federal Clean Water to prevent harm to downstream agriculture.

- (c) *Restore the Delta ecosystem, including its fisheries and wildlife, as the heart of a healthy estuary and wetland ecosystem.*

Recovery of Delta habitat and endangered/threatened priority species is at the core of Delta ecosystem restoration. During the last decade, Delta water flow and exports have received disproportionate attention as the predominant cause of ecosystem decline. Recent studies increasingly point to predation by non-native species, toxic discharges, and invasive species as more significant stressors. Restoration of Delta ecosystems will not occur without an expansive and unbiased analysis and mitigation of these "other stressors".

The basis for any restoration of a Delta ecosystem rests upon an open and documented understanding of the region's past role, process of physical change, desirable and undesirable impacts and value to current environmental, recreational, cultural and agricultural goals and the private, local, state and federal resources available to addressing them given the additional burden of climate change.

Creating a sustainable Delta ecosystem is an important objective, but to be successful, the Delta Plan should address all stressors in the Delta. For example, the State Water Resources Control Board report on Delta flow criteria is one-dimensional and, if implemented, would decimate California agriculture throughout the state and thus should and cannot be relied upon by the Delta Stewardship Council.

(d) *Promote statewide water conservation, water use efficiency, and sustainable water use.*

California's farmers and ranchers are committed to efficient water management and complying with the various provisions in the legislative package. The State Board of Food and Agriculture will assist in informing and helping implement these important measures. In developing policies, the state and federal agencies should recognize that these measures are dependent upon the region of the state and California policy must reflect regional differences and the unique nature of each region.

Water use efficiency is defined as the level to which existing facilities can be used to stretch supplies through flexible operations and the ability to store water that has been conserved. As specific to agriculture, water use efficiency helps to promote agricultural productivity and prevent land retirement as a result of dry conditions and shortages. As stated in the 2009 Water Plan Update, farmers need to be assured that conservation will not result in the loss of water rights spurring the loss of efficiency. California must recognize "retained" supplies as a result of real conservation measures and as a way to spur private and local government investments in water use efficiency as well. California must also account for the ability to conserve water that can be retained for dry years through new storage facilities and legal mechanisms governing the operation of existing facilities.

(e) *Improve water quality to protect human health and the environment consistent with achieving water quality objectives in the Delta.*

The basis for any restoration of a Delta ecosystem rests upon an open and documented understanding of the region's past role, process of physical change including water quality, desirable and undesirable impacts and value to current environmental, recreational, cultural and agricultural goals and the private, local, state and federal resources available to addressing them given the additional burden of climate change.

Urban and agricultural areas that discharge sewage and run-off into the Delta must be assisted with financial and infrastructure resources to comply with the Federal Clean Water Act to prevent harm to downstream agriculture through degraded water quality.

California's farmers and ranchers in the Central Valley are working closely with the Regional Water Quality Control Board through the Irrigated Lands Program to improve and enhance water quality, the California Dairy Program and other programs that will improve water quality in the Delta watershed.

(f) Improve the water conveyance system and expand statewide water storage.

A viable conveyance system is needed to help with the strategic timely movement of water in California where it can be retained in accessible storage facilities, and used in compliance with environmental laws and to cope with climate change and a permanent state of uncertainty. Conveyance and storage must operate hand-in-hand to encourage water efficiency as well as to motivate conservation of supplies that can be retained for dry conditions. In looking at strategic water resources for the State of California, new and improved storage in areas upstream of the Delta (i.e., Sites Reservoir, Temperance Flat) will be critical to restore the Delta while advancing regional sustainability and improving statewide water supplies.

(g) Reduce risks to people, property, and state interests in the Delta by effective emergency preparedness, appropriate land uses and investments in flood protection.

The basis for any restoration of a Delta ecosystem rests upon an open and documented understanding of the region's past role: process of physical change including water quality, flood events and dangers; desirable and undesirable impacts; and value to current urban, environmental, recreational, cultural and agricultural goals with the private, local, state and federal resources available to addressing them given the additional burden of climate change.

(h) Establish new governance structure with the authority, responsibility, accountability, scientific support, and adequate and secure funding to achieve these objectives.

The basis for any restoration of a Delta ecosystem rests upon an open and documented understanding of the region's past role: process of physical change including water quality, flood events and dangers; desirable and undesirable impacts; and value to current urban, environmental, recreational, cultural and agricultural goals with the private, local, state and federal resources available to addressing them given the additional burden of climate change. Thus the governance of the Delta must operate in general acknowledgement of these factors and in a complimentary manner with the operation and efficiency of the state water system so that the diverse stakeholders it serves and who provided funding in return, recognize the value of the Delta to their own enterprises, values, local needs and prosperity.

Additionally, developing a Finance Plan that relies on fees for water users is premature and should be developed in tandem with improvements in water supplies.