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May 12, 2011

**SENT VIA EMAIL** ([deltaplancomment@deltacouncil.ca.gov](mailto:deltaplancomment@deltacouncil.ca.gov))

Ms. Terry Macaulay  
Deputy Executive Officer, Strategic Planning  
Delta Stewardship Council  
650 Capitol Mall  
Sacramento, CA 95814

Re: LAND Comments on Third Staff Draft Delta Plan

Dear Ms. Macaulay:

These comments are submitted on behalf of Local Agencies of the North Delta (“LAND”), which is a coalition comprised of reclamation and water districts in the northern geographic area of the Delta.<sup>1</sup> LAND participant Agencies have concerns about how the Delta Stewardship Plan (“Plan”) may eventually impact provision of water and/or drainage and flood control services to landowners within their respective districts, and wish to consult with the Delta Stewardship Council (“Council”) on these and related issues. (Water Code, § 85300, subd. (b).) These comments are offered in an attempt to promote development of a Plan that meets statutorily mandated legacy community, sustainable agricultural, economic, environmental and other values as the Council pursues its broader co-equal goals.

***Due to the additional drafts to come, we again request that redline revisions of each chapter be provided online so that it is possible for reviewers to easily discern the changes that have been made.***

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<sup>1</sup> / Current LAND participants include: Reclamation Districts 3, 150, 551, 554 and 999. Some of these agencies provide both water delivery and drainage services, while others only provide drainage services. These districts also assist in the maintenance of the levees that provide flood protection to homes and farms.

## **Chapter 1: The Delta Plan**

### General Comments

The Third Draft of the Delta Plan includes significant and positive improvements to several policies affecting LAND member agencies. We appreciate these modifications in response to LAND and other public comments on the Second Draft Plan. We continue, however, to have concerns regarding the intent and clarity of the policies and recommendations. There also remains an issue regarding the creation of new and overlapping polices that would further complicate agricultural and other ongoing activities in the Delta without adequately addressing the fundamental challenges to Delta sustainability.

### Specific Comments

**Draft 3, p. 10, lines 37-39 (Draft 2, p. 3, lines 9-11):** Do not overstate risks, and differentiate risks in specific regions.

The risk of catastrophic failures in the Delta is still overstated with respect to many islands in the north Delta, which are not comprised of peat, have levees in better condition than many other areas, and are not significantly below sea level. Moreover, continued farming anywhere in the Delta is not at risk even in the event of levee failures, *if the levees are ultimately repaired.*

The State's historic lack of focus on maintenance and planning for levee failure and associated flooding emergencies, despite documented risk, is a political consideration which has been reversed in recent years. The Council's support of improved emergency response and the legislation prioritizing these efforts is a welcome change to this historic trend of neglect. However, it is unreasonable to assert that the risk "outpaces the State's ability to manage and fund risk reduction measures." Clearly this assertion is only correct if the planning and funding is actually attempted and fails. We do not believe either is accurate.

The Delta's agriculture is almost exclusively based on sustainable practices on a foundation of established water rights. It is an economically vibrant and stable agricultural region. This differs markedly from many of the areas that receive water exported from the Delta. The "uncertainty future" of agriculture within the Delta appears to be solely associated on proposals to convert this agriculture to other uses, such as the proposed changes to land management proposed by the Bay Delta Conservation Plan ("BDCP").

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Finally, while some of the islands in the central Delta do have peat soils, and in places these soils have oxidized and subsided due to past agricultural practices, continued levee maintenance is still required. If these islands are breached by floods, tidal bore (the height) of the tides may be reduced, which would render habitat improvements ineffective, and potentially halt water exports at the south Delta pumping facilities due to saltwater intrusion.

**Draft 3, p. 12, lines 19-32 (Draft 2, p. 3, lines 39-42):** Recognize that the existing Delta already has significant habitat values.

This section should reference expansion of existing interconnected habitats, not re-establishment. The Delta already includes significant open space, habitat and migratory bird corridors. The Plan, as written, fails to describe the significant existing habitat values maintained as a result of agriculture. Delta agriculture already plays “an important and dynamic part of the Delta” and the reference to “new technologies” contributing to that role and associated benefits lacks meaning without a description of what that improvement might mean and how that might be accomplished.

Farmers within the Delta currently manage lands sustainably to enhance wildlife benefits – both by participation in formal certification programs and informal means. There is no evidence that this habitat quality is expected to change under current and proposed land management, with the exception of one proposal. The proposed BDCP includes alternatives that traverse and bisect existing migratory corridors, disrupt local hydrologic patterns, and eliminate an entire cohort of mature riparian cover.

The Council should carefully re-consider the imprecise and cursory nature of many of the broad comments that are used in the Plan to assert that there are problems with habitat and ecological connectivity in the Delta. These comments rely on unsubstantiated and misinformed colloquialisms and ignore the complex underlying science behind each identified problem. For instance, terrestrial and aquatic habitat values are not equivalent, and do not automatically support each other, as inferred in this draft. Also, migration of fish species is impaired or negatively influenced through flow reversals, unnatural salinity gradients, and water quality threats such as low dissolved oxygen and urban chemicals. As the primary, if not the sole reason, for the new planning and regulatory processes now underway is to better protect aquatic species, these water flow and quality issues should be the priority. In other words, the Third Draft Plan largely ignores one thing that would make a difference to aquatic species.

If the Plan continues to focus on habitat creation as a solution, we strongly urge the Plan to focus on use of the considerable existing *publicly owned* lands to quantitatively demonstrate that the proposed habitat projects can function as proposed, do function over the short term, and that they are likely to deliver the purported benefits over the long – term and that there is sufficient funding to operate, maintain, and monitor these projects.

**Draft 3, p. 12, lines 33-42 (Draft 2, p. 4, lines 14-21):** Recognize that agriculture is a value that must be protected and enhanced, consistent with SB 7x1.

We appreciate the modifications to this section that recognize the statutory requirement of the Plan to: “Protect and enhance the unique cultural, recreational, and *agricultural values* of the California Delta as an evolving place.” (Water Code, § 85054, subd. (b), italics added.) We again urge the Council to be informed by and rely on the policies included in the Delta Protection Commission’s recently adopted Land Use and Resource Management Plan (“LURMP”) for Agriculture. (Available at: <http://www.delta.ca.gov/res/docs/MP-Ag.pdf>.)

**Draft 3, pp. 13-15 (Draft 2, pp. 4-6):** Support consideration of entire Delta watershed. LAND supports the Council’s description of the geographic scope of the Plan, which would consider the entire Delta watershed to meet coequal goals. As Reclamation Districts, LAND agencies have no control over upstream activities that affect Delta water quality and quantity. The hundred-year stewardship of much of the state’s critical flood and water delivery infrastructure and maintenance of Delta habitat has long been the unrecognized by outside interests that benefit from the services. The Delta should not bear the inequitable double burden of the effects of upstream water users as well.

**Draft 3, p. 16 (Draft 2, p. 7, lines 25-27):** Council should not blindly promote completion of BDCP.

LAND continues to support the Councils statement that “The Council has determined that any consideration or use of BDCP related studies or concepts in the Delta Plan will not have a pre-decisional effect on any possible future appeal of a Department of Fish and Game determination related to the BDCP.” However, the Council should not assume that BDCP completion will promote the coequal goals embodied in SB 7x1.

As described briefly in the discussion of corridors and habitat connectivity above, the BDCP trades-off to a significant degree postulated *aquatic* habitat improvements with significant riparian, seasonal wetland and terrestrial habitat impacts both in the short- and long-term. The Council’s scientific advisors have the ability to independently assess the obvious positive and negative ecological impacts of the BDCP, as well as assess the relative benefits of this proposed project in meeting the co-equal goals. Given the very

short time frame for review and the monumental task of sifting through the existing information, we recommend that this scientific assessment process begin now in order to more effectively inform the Council's review.

The Plan cannot actively and prospectively attempt to apply the co-equal goals, without assessing and planning for the whole of the system and the likely impacts of major projects. As written, Plan policies and recommendations address parts of the BDCP (e.g., habitat creation), but do not provide any guidance on the most potentially deleterious aspects of the BDCP (e.g., new isolated conveyance). It is appropriate for the Council to provide guidance on all issues slated for coverage in the Delta Plan by SB 7x1, irrespective of the content of the draft BDCP, which will likely continue to be modified over the coming years.

## **Chapter 2: Science and Adaptive Management**

Comments on this chapter will be provided at a later date.

## **Chapter 3: Governance**

### General Comments

Local districts undertake continuing maintenance and operational activities to provide essential water and flood control services. This chapter should be written in a manner that takes into account the continued need for provision of these services without adding onerous and unnecessary requirements.

### Specific Comments

#### **Draft 3, pp. 35-39 (Draft 2, pp. 22-23): Submission of Certification for Proposed Covered Actions.**

While there have been significant improvements and clarification in this section (including the excellent associated FAQ), the submission requirements appear to be disproportionately detailed and onerous with respect to covered actions that may be associated with continued agricultural operations in the Delta. Clearly, such an approach could result in a conflict with the Council's statutory mandate to develop a Plan that protects the agricultural values of the Delta. Further description of what types of actions that "[w]ill have a significant impact on achievement of one or both of the coequal goals" (Water Code, § 85057.5, sub. (a)(4)) should be developed to ensure that these requirements are not applied so broadly that it is impossible to undertake any agricultural or community projects in the Delta. In order to avoid overwhelming the Council with

consistency determination requirements for minor projects that will likely impact the co-equal goals, the Plan should define “significant” in a manner that focuses on large-scale projects. As explained above, LAND is primarily concerned with the viability of continued agricultural and related activities in the Delta, not development for other purposes.

LAND supports excluding projects that local lead agencies have determined to be exempt from the California Environmental Quality Act the requirement to make a consistency finding. (Pub. Resources Code, § 21000 et seq. (“CEQA”). (See Pub. Resources Code, §§ 21080, subd. (b), 21080.01-21080.08, 21080.7-21080.33, 21084, subd. (a), CEQA Guidelines, § 15061, 15260-15285, 15300-15332.) Exempt projects have been selected by the Legislature and the Resources Agency pursuant to CEQA, and are unlikely have “a significant impact on achievement of one or both of the coequal goals.” This approach would provide local planning staff with better clarity regarding when consistency determinations are necessary. The types of projects subject to CEQA exemptions are described in the CEQA statute itself, in the CEQA Guidelines, in other statutes, and in the associated body of case law. It is not necessary, and would actually create further confusion, for the Council to try to provide a list or description of projects exempt from CEQA; the Plan should simply rely on the local lead agency’s determination regarding a project’s exemption from CEQA.

## **Chapter 4: Manage Water Resources**

### **General Comments**

While management of water resources in the entire Delta watershed should be improved, a full range of potential improvements should be considered. The Third Draft of the Plan continues to focus too much attention on better quality water for export, to the exclusions of other opportunities to more carefully manage the state’s limited water supplies.

### **Specific Comments**

**Draft 3, WR P1 and P2, pp. 47-48 (Draft 2 p. 30, WR P2):** Greater regional self reliance is key to meeting the coequal goals.

LAND supports the policies set forth to promote regional self sufficiency. As noted in **WR P1**, *regional self-sufficiency is critical to reduce impacts from changing circumstances and to avoid the purported impacts from Delta risks.*

The changes to this section are helpful, but it remains unclear how these policies would apply to diversions in the Delta for in-Delta use. While the policies make sense at the large scale, they should not be applied to local districts within the Delta, as all water used stays within the watershed. Delta district activities are also unique in that they provide dual functions of flood control and agricultural benefits. Moreover, in-Delta water users cannot reduce their reliance on the Delta. In-Delta water uses therefore should not be subject to the requirements for creation of a Water Sustainability Element.

Additionally, Delta agencies have long-term plans affecting water diversions that should not be thwarted by the Plan. For instance, co-location and screening of intakes would help improve ecosystem conditions in the Delta while continuing sustainable agricultural activities. These types of projects are desirable and should not be subject to P1, P2 or P3, or considered covered actions in the first place since they would promote, not interfere with, meeting the coequal goals.

**Draft 3, pp. 50-51: Conveyance Policies and Recommendations are Needed**

The Third Draft Plan does not include any policies regarding conveyance. The Council should provide at least general guidance, consistent with the charge provided in SB 7x1 regarding storage and conveyance. The facts that: (1) the BDCP may become automatically part of the Delta Plan, and (2) the Council may have an appellate role with respect to the consistency of the BDCP with the Delta Plan, do not obviate the need for the Council to address this issue.

In general, the term “conveyance” continues to be construed too narrowly. The Council’s charge is to “promote options for new and improved infrastructure relating to the water conveyance in the Delta . . .” (Water Code, § 85304.) Conveyance does not necessarily equal the peripheral canal or tunnel. Rather, conveyance is the method by which water is removed from the Delta. Currently, through-Delta conveyance to the southern pumps is the conveyance method.

The Council is in an appropriate position to give general direction to the BDCP and any future process on conveyance, as it does for ecosystem restoration (Chapter 5). The Plan should provide some policy direction for the development of improved conveyance that: (1) recognizes that conveyance may come in many forms (i.e., may not include an actual tunnel or canal); and (2) should not substitute one co-equal goal (restoring the Delta) for another (reliable water supply). On this second point, specific policies could include:

- Conveyance should not simply relocate environmental, species and water quality problems to new places but instead should provide improvements in conditions throughout the Delta;
- Any change in diversion point for new conveyance must not injure any legal user of water;
- Conveyance should not interfere with the ability to restore Delta ecosystems;
- A broad spectrum of conveyance options should be evaluated prior to selection of any option. Examples include continuing through Delta (and screening the current intakes) as well as a west Delta island based intake. (Note that the Council does not have to prefer any of these options but should provide leadership on the issue of at least considering these options as possible projects.)

**Draft 3, WR R5, p. 52 (Draft 2, WR P3, p. 31): Water Use Reporting**

The changes to this section, which more fully take into account existing reporting requirements and avoid the imposition of new and conflicting requirements, are appreciated.

**Chapter 5: Ecosystem Restoration**

*Because they have not yet been addressed, we restate and reaffirm our comments on the Second Draft Plan below.*

**General Comments**

LAND is concerned that ecosystem restoration be conducted in a manner that does not interfere with existing agriculture and communities in the Delta. Moreover, any burdens from creation of habitat should be borne by the habitat projects, not neighboring landowners. To this end, Land Use Policy P-3 of the LURMP states:

New non-agriculturally oriented residential, recreational, commercial, habitat, restoration, or industrial development shall ensure that appropriate buffer areas are provided by those proposing new development to prevent conflicts between any proposed use and existing adjacent agricultural parcels. Buffers shall adequately protect integrity of land for existing and future agricultural uses and shall not include uses that conflict with agricultural operations on adjacent agricultural lands. Appropriate buffer setbacks shall be determined in consultation with local Agricultural

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Commissioners, and shall be based on applicable general plan policies and criteria included in Right-to-Farm Ordinances adopted by local jurisdictions.

(Available at: <http://www.delta.ca.gov/res/docs/MP-Land%20Use.pdf>.) A similar policy should also be adopted by the Council.

### Specific Comments

**Draft 3 p. 67 ER P4 (Draft 2, p. 34, ER P4):** Setback levees are not feasible in areas that are already in farming and other uses.

Setback levees that interfere with or result in a taking of existing permanent crops and homes should not be a priority. The caveat of setback levees “*where feasible*” has been removed and is a significant step backward for this process.

Again, it would clearly benefit species and their habitat for the Council to promote resolution of issues surrounding application of Army Corps policies regarding vegetation on levees. If this issue could be resolved, valuable contiguous riparian habitat could be maintained, or created in appropriate areas, without setback levees. The Council should therefore consider adoption of recommendations regarding the Army Corps levee policies; consultation with the Department of Water Resources regarding its recommendations on this issue, which affects over 1,500 miles of levees in the state, would likely be informative.

**Draft 3, ER 5, p. 69 (Draft 2, p. 35, ER R1):** It should not be presumed that the BDCP would be beneficial or meet the coequal goals.

Major new conveyance facilities would result in significant environmental and other impacts, including the potential for severe reductions in flows through the Delta. Should the Council proceed with ecosystem and conveyance planning recommendations independent of BDCP, it should fully consider all feasible alternatives to construction of major new conveyance facilities in the North Delta that would reduce or avoid environmental and other impacts (e.g., suites of options such as continued through-Delta conveyance, reduced water exports/water conservation, and increasing groundwater/aboveground storage).

**Draft 3, ER R2, p. 68 (Draft 2 p. 35, ER R5): Policies regarding use of eminent domain are still needed.**

The Council should direct that the Delta Conservancy Strategic Plan preclude use of eminent domain to obtain habitat and include strong policies to coordinate with local agencies and landowners in planning and implementing habitat projects.

The fifth bullet under ER R2 now refers to development of a plan and a protocol for acquiring necessary land for ecosystem restoration. This is inadequate to address the concerns regarding use of eminent domain for habitat projects. As explained previously, a sub-recommendation should be added to preclude use of eminent domain for habitat projects. Local Habitat Conservation Plans (“HCPs”) do not allow condemnation of land for the simple reason that these lands are already managed effectively by local residents and their support is needed to maintain the conservation benefits. The willing seller requirement of these HCPs protects existing habitat and species, and promotes a positive, collaborative approach to new land acquisitions and protective easements. Moreover, coordination with local agencies and landowners is essential to the long term success of any major habitat project and should also be recommended. Inclusion of mutual benefits for habitat projects from the inception of the planning process results in vastly better ecological effects on the ground than projects that are delayed by ongoing disputes with affected landowners.

**Chapter 6: Improve Water Quality**

*Because they have not yet been addressed, we restate and reaffirm our comments on the Second Draft Plan below.*

**General Comments**

The co-equal goals simply cannot be met without a concerted and implementable sustainability strategy. Farmers in the Delta implement a wide range of sustainable practices that conserve water and improve water quality. For instance, many grape growers are “certified sustainable” under the Lodi Rules Sustainability Program. This is an intensive, third party audited program that covers all aspects of wine grape growing. Beneficial practices in the program include:

- *No Till Centers* - Planted to cover crops of grasses and legumes provide for soil tilth, soil nutrients, erosion control, and beneficial insect habitat;
- *Mechanical Cultivation Under Berms* – Cultivation decreases herbicide requirements, promotes better water penetration, and controls noxious weeds;

- *Drip Irrigation* – Results in improved water utilization, decreased water requirements, water placement exactly where and when needed by vines, and provides better uniformity control;
- *Use of Technology* – Neutron probes, for instance, can be used to determine soil moisture. Pressure probes can be used to determine vine hydration. In vineyard weather stations can be used to track evapotranspiration, degree days, temperature and humidity to strategically plan both irrigation and fungicide spray requirements;
- *Vegetative Buffers* – Grasses planted on vineyard borders and in swales can be used to control erosion and catch soil sediments prior to run off; and
- *Integrated Pest Management* – Alternatives to conventional pesticides and “soft” chemicals can be used to avoid beneficial insect kills.

The Plan should include policies to promote these and other sustainable practices in the Delta, upstream of the Delta, *as well as in areas that rely on water exported from the Delta*. To this end, the Council may wish to also adopt the language of Agriculture Policy P-7 of the LURMP, which states:

Encourage management of agricultural lands which maximize wildlife habitat seasonally and year-round, through techniques such as fall and winter flooding, leaving crop residue, creation of mosaic of small grains and flooded areas, wildlife friendly farming, controlling predators, controlling poaching, controlling public access, and others.

(Available at: <http://www.delta.ca.gov/res/docs/MP-Ag.pdf>.)

## **Chapter 7: Reduce Delta Flood Risk to People, Property, and State Interests**

### **General Comments**

The Third Draft Plan continues to include numerous policies to restrict development within the Delta with the ostensible goal of reducing risks. However, as has been explained by LAND as well as other local governments previously, development within the Delta is already severely limited by existing state and local requirements.

Specific Comments

**Draft 3, p. 91 (Draft 2, RR P4; p. 40 RR P3):** Policies regarding levee classifications should take into account existing land uses and the feasibility of major levee upgrades. This policy still appears to foreclose consistency of any covered action if the area does not conform to the classifications in Table 7-1. As explained previously, this result is not in any way required by SB 7x1. Though the policy cites Water Code sections 85021 and 85302, neither of these sections even refer to risks associated with levee design standards. The last two cited sections refer to the promotion of “effective emergency preparedness, appropriate land uses, and strategic levee investments (Water Code, § 85305, subd. (a)), and making recommendations for “state investments in levee operation, maintenance, and improvements in the Delta (Water Code, § 85306).

The classification standards suggested in Table 7-1 are still not feasible, attainable or necessary. As discussed at the March 25, 2011, Council meeting, none of the Delta islands comply with these standards. Moreover, given the populations of many of the islands, there are many alternative means besides construction of environmentally destructive “superlevees” to adequately protect people and property. Legacy communities are unable to fund upgrades to 200-year levees, yet will likely need to implement covered actions to maintain social economic and agricultural viability. Additionally, the land base necessary to meet 200-year levee criteria and setback levees is simply not available and would make it impossible to meet the standards in Table 7-1.

It is also unreasonable for the Council to layer new flood control requirements over the top of existing FEMA standards, especially in rural and agricultural areas. As explained in previous comments, the counties already restrict rural residential development (usually to two dwelling units per parcel) in the Primary Zone of the Delta. Further restriction of the already limited development potential in rural areas of the Delta is not necessary to reduce risks and would instead threaten the continued viability of the local agricultural economy. Instead, the Council should focus on ways to assist local governments to bring levees into conformance with existing requirements, including facilitation of funding and reimbursement for levee maintenance and repairs, as well as preparedness for emergencies.

Further, RR P5 (p. 92) now states, “Until the Department of Water Resources adopts criteria to define locations for future setback levees, any action located next to the land side of a levee shall demonstrate adequate area is provided to accommodate setback levees, as determined by a registered civil engineer or geologist.” This is an onerous and unreasonable requirement from an economic, as well as implementation perspective.

Does this apply to “any action” or any covered action since Delta islands are within the land side of levees by definition? On what technical basis can the engineer or geologist make that determination? Are they supposed to predict all the possible locations, geometries, and priorities for future setback levees? This requirement as written is both unnecessary and un-implementable.

**Draft 3, RR P6, p. 92 (Draft 2, pp. 40-41, RR P4):** Investment priorities should not be designed to foreclose investment in locally important levee systems.

These investment priorities as currently written would preclude ever investing in levees in rural and agricultural areas of the Delta. Yet it is essential to maintain these levees in order to achieve the co-equal goals, and sustain Legacy communities and Delta agriculture. Moreover, issues affecting Delta islands are different than criteria or examples used for river flooding. Flood insurance is dependant on levee conditions meeting specific standards, which can only be maintained through levee investments. Delta legacy communities should not be precluded from priority to receive funding for critical levee maintenance and improvements.

**Draft 3, RR P3, p. 89 (Draft 2, p. 44, RR R6):** Any new Flood Control District should not detract from funding of existing districts with flood control and related responsibilities.

It is still not clear that a new entity with taxation powers is necessary. To the extent the formation of such an entity is necessary, its formation should not detract from funding for existing local entities with taxation authority.

If this recommendation is retained, it should specifically reference the need to coordinate the creation of any new districts with existing districts. Reclamation districts already cooperate amongst themselves to provide essential services, including provision of mutual aid in emergencies. Any recommendations of the Council for legislative action should build on these existing systems and relationships, and avoid new requirements that would jeopardize the continued provision of essential services/infrastructure by existing local agencies. There is no evidence provided to support the proposal that an additional agency, created from whole cloth, will improve on the existing process. While not ideal, the existing process generally meets local districts’ needs and funding mechanisms. From the local agency perspective, the primary improvement in the process would come from better coordination between the existing participants and streamlining of documentation requirements, not creation of a new layer of bureaucracy.

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If a new entity was formed, the potential for it to operate under the Delta Protection Commission should be considered. It is essential that any new entity be primarily managed by local interests with on the ground knowledge of local conditions. The details of potential changes in approach to flood control in the Delta should be discussed collaboratively with the affected entities, and LAND member agencies would certainly be willing to participate in such a discussion.

**Chapter 8: Protect and Enhance the Unique Cultural, Recreational, Natural Resources, and Agricultural Values of the California Delta as an Evolving Place**

**Draft 3, pp. 101-102 and 103-104.**

Promotion of agriculture in the Delta still needs to be addressed more fully in this portion of the Plan; creation of special agricultural districts is one way to promote agriculture. LAND recommends that staff confer with the Delta County Agricultural commissioners for recommendations regarding policies that would promote the Delta's agricultural values.

**Chapter 9: Finance Plan to Support Coequal Goals**

Comments on this chapter will be provided at a later date.

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Thank you for considering these comments on the Third Draft of the Plan. LAND would be pleased to discuss the specifics our written and oral comments and concerns with the Council's staff at their convenience. It is clear that this Plan is developing rapidly and the need for communication and coordination with local agencies is immediate. We look forward to continued collaboration with the Council and staff as the Plan progresses.

Very truly yours,

**SOLURI MESERVE**  
A Law Corporation

By:



Osha R. Meserve

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cc: Steering Committee, Local Agencies of the North Delta