



SACRAMENTO COUNTY FARM BUREAU

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Delta Stewardship Council
650 Capitol Mall, Fifth Floor
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Dear Chairman Isenberg:

Sacramento County Farm Bureau appreciates the opportunity to comment on the Delta Stewardship Council's Second Draft Interim Plan dated July 14, 2010. We are pleased that as the Delta Stewardship Council strives to achieve the coequal goals, the protection, maintenance and where possible, enhancement of Delta agriculture is a key state policy.

Because the Delta is an extremely complicated and diverse region, it is important that the current situation is accurately characterized so that solutions can be properly developed. We feel that in the Introduction, the following statements should be changed:

1. Page 1...line 24. The Delta is not **the** source of drinking water for nearly two thirds of the state's population. A more accurate statement would be that nearly two thirds of the state's population gets a portion of its water from the Delta.
2. Page 3... line 17. While subsidence may be a major problem in some parts of the Delta, the general statement that "...much of the Delta landscape has subsided as much as 25 feet below sea level..." is inaccurate and should be changed.
3. Page 5... lines 30-31. The results of increased salinity should be expanded to include degradation of Delta agriculture.
4. Page 5...lines 32-40. Increased storage and conveyance around the Delta might provide flexibility for a reliable water supply, but it should be recognized that conveyance around the Delta without increased storage may not be consistent with the coequal goals and protection of Delta natural resources, agriculture and recreation values.
5. Page 6...lines 28-29. "...The Delta is an estuary with so much land below sea level, water is constantly exerting pressure against the levees." While there are some areas of the Delta where this is true. There are large parts of the North, South and Eastern Delta where this statement is inaccurate.

Also in the introduction, page 11 lines 23-30 and in Section IV page 40 lines 4-14, reduced reliance on the Delta should be expanded to include analysis of the current situation and

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what constitutes success. We feel that this is extremely important because some actions being considered today will solidify dependence on the Delta and could even result in increased dependence over time making it more difficult to accomplish this state policy.

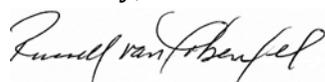
In Section IV, page 28 lines 35-38 the Draft Interim Plan states that the SWRCB in conjunction with DFG is required to develop water flows which must include plans to “promote options for new and improved infrastructure relating to the water conveyance in the Delta”. This statement relies on Section 85304 which states “The Delta Plan shall promote options for new and improved infrastructure relating to the water conveyance in the Delta”. Therefore, while the Delta Plan developed by the Delta Stewardship Council must promote additional options for conveyance, the flow standards developed by SWRC and DFG do not. The flow criteria are meant to inform the process not to direct it.

Lines 45- 46 on page 8 Appendix 1 of the Draft Interim Plan provide for dismissal of any appeal of the BDCP if “the council or its executive officer determines that it does not raise an appealable issue”. What is an appealable issue? If the executive officer’s power to dismiss an appeal remains in the Interim Plan, appealable issues must be clearly defined. If an appellant complies with the provisions as detailed and provides additional information if requested, the appeal should be heard by the Delta Stewardship Council.

Finally, because state policy as articulated in SBX 7 1 is to protect and where possible enhance Delta agriculture, Sacramento County Farm Bureau is troubled by plans to convert large amounts of Delta agriculture to habitat (Appendix V, page 2, lines 26-27 Strategy 3.1 to convert approximately 100,000 acres to habitat). Regionally agriculture has been decimated. There needs to be a strong and real commitment in the Interim Plan and the subsequent Delta Plan to demonstrate how agriculture will be protected, maintained and enhanced. Both plans must protect Delta agriculture, not with wildlife or crop restricting easements, but in a manner that will allow the economic engine of the Delta economy, agriculture, to adapt and change as markets and conditions dictate.

Thank you again for the opportunity to comment on the Second Draft Interim Plan.

Sincerely,



President,
Sacramento County Farm Bureau