May 30, 2008

Paul A. Marshall  
South Delta Improvements Program  
Bay-Delta Office  
California Department of Water Resources  
1416 Ninth Street  
Sacramento, CA 95814

RE: BDCP EIR/EIS scoping comments

Dear Mr. Marshall:

The purpose of the Sacramento County Farm Bureau is to protect and promote agricultural production and operations in Sacramento County. In the attached letter dated October 24, 2007, we supported executive order S-17-06 and the Blue Ribbon Task Force’s objective to create a vision and plan for a durable Delta.

In that letter, we stated that water exports must pass through the Delta. Farm Bureau emphatically opposes an isolated facility (peripheral canal). Any conveyance system that removes fresh water from the Delta would result in degraded water quality and irreversible environmental damage to the Delta as well as a tremendous negative impact to agriculture. It has been brought to our attention that the Bay Delta Conservation Plan (BDCP) is being developed to address negative impacts to fish caused by water exports from the Delta. The BDCP presents four options which describe modifications to conveyance of water through and around the Delta and establish a “primary habitat restoration zone” for each. It is our understanding that the habitat restoration zones are planned to become marsh and tidal marsh. In each of the four options, significant portions of highly productive farmland in Sacramento County, Yolo County, and Solano County are designated as “primary habitat restoration zone”.

With the exception of Prospect Island, we are opposed to designating any farmland located in the North Delta and east of the Sacramento River Deep Water Ship Channel for conversion to marshland for the following reasons,

1. This part of the North Delta is organized into reclamation districts.
2. This part of the North Delta is devoted to intensive, high value agricultural production to include pear orchards, apple orchards, wine grape vineyards, and cherry orchards.
3. This part of the North Delta provides a significant amount of habitat for terrestrial animals and is important nesting and foraging habitat for the Swainson’s hawk and other avian species.
4. This part of the North Delta does not include large tracts of land in public ownership.
5. This part of the North Delta will be the most resistant to the drivers of change being considered by the Blue Ribbon Task Force and should be preserved for agricultural production, recreation, and terrestrial habitat.

Reclamation districts operate to provide flood protection, drainage and in some cases, water to land owners within their boundaries. These districts are successful because all landowners need the same services. During winter and early spring months, reclamation districts try to remove every drop of water they can from within their borders. Water is the common enemy. Wetlands and cropland within the boundaries of reclamation districts cannot co-exist. Not only will there be conflicts concerning drainage, but wetland areas will increase groundwater elevations for surrounding neighbors, compromising the agricultural productivity of their lands.

The North Delta east of the Sacramento River Deep Water Ship Channel includes all of the Clarksburg Wine Grape Appellation. Within the Clarksburg Appellation, there are thousands of acres of highly productive vineyards designated as “primary habitat restoration zone” for all four options. In addition, the North Delta includes the largest and most productive Bartlett pear-growing region on the West Coast and produces more than half of all Bartlett pears grown in California. Apples, cherries, vegetables, seed crops, tomatoes, alfalfa, grains and other crops are also produced in the North Delta. Because the North Delta is such a highly productive agricultural area, the cost of acquisition and conversion will be billions of dollars. This is not a good area to convert to marsh.

The North Delta provides terrestrial habitat for many species of animals, reptiles, and birds which would be displaced by marsh. Where will the sandhill cranes go when there are no corn, wheat, safflower and alfalfa fields for foraging? Will the BDCP provide mitigation for Swainson’s hawk, loss of farmland, and for all the other negative impacts? This will add tremendously to the cost of acquisition and conversion and because the loss of farmland, jobs and economic activity cannot be replaced, the North Delta should not be considered for habitat restoration in the BDCP.

Because the area is broken up into many small parcels with many individual owners, acquisition will be infeasible. There will be few willing sellers. In order to execute a successful BDCP, conversion should occur where acquisition is possible and affordable. In the North Delta east of the Sacramento River Deep Water Ship Channel, it will be impossible to acquire land in
large parcels and impossible to convert any acquired land to marsh because during portions of the year, water is the common enemy in reclamation districts.

Finally, because the North Delta will be affected the least by the drivers of change, and because the State of California’s Delta Protection Act of 1992 has already reserved the North Delta for agriculture, recreation and habitat, this area should not be considered for conversion to marsh. For all the reasons explained in the Delta Protection Act, this area will become increasingly important to the surrounding urban areas.

A credible BDCP will be a feasible BDCP. As alternatives are developed for further study during the EIR/EIS process, we urge you to remove the North Delta east of the Sacramento River Deep Water Ship Channel for consideration as “primary habitat restoration zone” and concentrate your efforts on the Yolo Bypass, Prospect Island, Liberty Island and the Lower Bypass. The Yolo Bypass area will require minimal infrastructure, can be connected to water north of Sacramento by using the toe drain, is subject to frequent inundation, and includes large areas of public ownership. Designating the Yolo Bypass area as the “primary habitat restoration zone” to help offset the negative impacts caused by water exports is feasible and credible for all four options under consideration.

Thank you for your consideration,

Russell van Loben Sels,

Vice President,
Sacramento County Farm Bureau

cc.  Ms. Delores Brown, Department of Water Resources
     Honorable Dan Lungren
     Honorable Guy Houston
     Honorable Mike Machado
     Honorable Charles Poochigian
     Honorable Lois Wolk
     Honorable Dave Cox
     Honorable Alan Nakanishi
     Honorable Deborah Ortiz
     Sacramento County Board of Supervisors
     Contra Costa County Farm Bureau
     Solano County Farm Bureau
     Yolo County Farm Bureau
     San Joaquin County Farm Bureau
October 24, 2007

Phil Isenberg, Chair
Delta Vision Blue Ribbon Task Force
650 Capitol Mall
Sacramento, CA 95814

Dear Mr. Isenberg:

Sacramento County Farm Bureau supports executive order S-17-06, which directs the Blue Ribbon Task Force to develop a vision for sustainable management of a durable Delta by January 2008 and supports that part of Governor Schwarzenegger’s water plan which creates new surface water storage.

Sea level rise, climate change, subsidence, and potential seismic activity will negatively impact services provided by the Delta. Sacramento County Farm Bureau will only support a “Delta Fix” which includes the following elements:

1. Adequate levee maintenance and upgrades.
2. Water for exports moved through the Delta.
3. Exportation of surplus water only.
4. Reduced dependency on the Delta for water exports.

All Delta services, including flood management, transportation, utilities, ecosystem health, water supply, and land use, are dependent on a well-maintained levee system. Because these services are essential to the entire state of California and because any vision for the Delta will take many years for implementation, any plan for the Delta must provide for immediate and adequate levee maintenance and upgrades, especially in the Western Delta, where the greatest risk from seismic activity has been identified.

Water exports (State Water Project and Central Valley Project) must be rerouted in order to minimize negative environmental impacts. Any modified route for export water must pass through the Delta. Through Delta conveyance provides flexible management to protect water quality in the Delta Pool for all Delta water users. Sacramento County Farm Bureau emphatically opposes an isolated facility (peripheral canal). Any conveyance facility which removes fresh water from the Delta will result in degraded water quality for Delta water users and catastrophic and irreversible environmental damage.

When the State Water and the Central Valley Projects were built, Federal and State Governments clearly stated that only surplus water would be exported. Because water storage projects upstream from the pumps were not built as planned, there is
insufficient water in the Delta to support export targets and until significant new surface storage is created any Delta Vision will be severely compromised. Pumping export water from the Delta must be done on an “opportunistic” basis (only occur when there is a surplus), and cannot negatively impact either the supply or quality of area-of-origin users.

Users of export water should strive for regional self-sufficiency by using tools such as ground water storage, surface storage, conservation, reuse, and desalinization. By reducing dependence on Delta exports, the water supply for millions of Californians will be more secure in the future.

Sacramento County Farm Bureau understands that the Delta is a very complex system and that there are major gaps in scientific knowledge to support long-term changes. Therefore, within the framework outlined above, we can only support actions which are adaptive (easily modified to conform to knowledge as it develops) and are reversible in the event they do not work as intended. Actions should be incremental and subject to continuous scientific evaluation.

Thank you for your consideration.

Sincerely,

Ken Oneto, President
Sacramento County Farm Bureau

cc Blue Ribbon Task Force
Governor Arnold Schwarzenegger
Honorable Barbara Boxer
Honorable Dianne Feinstein
Honorable Dan Lungren
Honorable Guy Houston
Honorable Mike Machado
Honorable Charles Poochigian
Honorable Lois Wolk
Honorable Dave Cox
Honorable Alan Nakanishi
Honorable Deborah Ortiz
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