May 14, 2009

Ms. Delores Brown, Chief
Office of Environmental Compliance
Department of Water Resources
PO Box 942836
Sacramento, CA 94236
BDPCcomments@water.ca.gov

RE: Bay Delta Conservation Plan (BDCP) Scoping Comments

Dear Ms. Brown;

Sacramento County Farm Bureau is very concerned about how the Bay Delta Conservation Plan (BDCP) will affect Sacramento County agriculture. Please reference our scoping letter dated May 30, 2008 and include it by reference herewith. These comments should not be considered conclusive due to the lack of detail in plans as presented during the most recent scoping meetings and due to the frequent changes to maps and proposals describing the BDCP. Lack of detail and frequent changes makes it very difficult to understand and comprehensively comment on impacts caused by BDCP.

As Sacramento County Farm Bureau understands the BDCP today, we believe it will harm Sacramento County Agriculture in a variety of ways:

1. Isolated conveyance proposals with multiple outlets and large surface canals will negatively impact the northern Sacramento County Delta far beyond the footprint of the project.
2. Undefined habitat restoration projects in the vicinity of the Cosumnes River Preserve and McCormack Williamson Tract will negatively impact the environment, flood control operations and farming.
3. The BDCP has reduced and will further reduce land values.
4. BDCP environmental projects which convert or destroy agricultural lands will harm the local and regional economies as well as avian and terrestrial species.

The BDCP has published maps showing multiple canals slicing and dicing the northern part of the Sacramento County Delta. The following multiple negative impacts will result from dividing reclamation districts and creating new Delta channels:

To Represent and Promote Agriculture in Sacramento County
1. The BDCP will create new avenues of seepage limiting crop choices and productivity and destroying permanent crops such as cherries, pears and grapes.
2. The BDCP will destroy and make infeasible provision of essential reclamation district services such as flood control, drainage and delivery or irrigation water.
3. The BDCP will interfere with regional flood control in the Delta, the Franklin area ns the Cosumnes and Mokelumne Rivers by redirecting normal and historical flow of floodwaters.
4. The BDCP will destroy special status, highly productive farmland both in the footprint of the project and in the areas where infrastructure is destroyed.
5. The BDCP will violate one of the primary goals of the Delta Protection Act of 1992; the promotion and protection of Delta agriculture in the Primary Zone.

The BDCP has developed maps showing areas where it will focus on habitat projects to benefit targeted fish species. One of these areas is composed of the Cosumnes River Preserve, McCormack Williamson Tract and the northern part of New Hope Tract. Although the BDCP has not provided the specifics of how these projects will be designed, Sacramento County Farm Bureau is concerned that the following negative impacts could result from habitat projects:

1. The BDCP will redirect impacts from the State and Federal pumping facilities to pumping facilities in close proximity to the habitat protects, causing controls and restrictions on Sacramento County Delta farmers; ability to operate their pumping facilities.
2. The BDCP will interfere with historical flood flows or change those flows in a manner which is detrimental to the region.
3. The BDCP will include redesigned levee systems which will increase flood risk for neighboring reclamation districts and the entire region.
4. The BDCP will cause seepage impacts which will limit the ability to farm surrounding land.

By putting lines on maps and widely distributing preliminary objectives, the BDCP has reduces land values do to real estate disclosure requirements and uncertainty. As alternatives are developed, land value declines will become even more extreme for the following reasons:

1. The BDCP will reduce or destroy habitat easement values.
2. The BDCP will destroy agricultural land and production and eliminate or restrict crop choices.
3. The BDCP will redirect species impacts and create operational limitations.
In addition, Sacramento County farmland that is in the direct path of the BDCP highly productive and capable of producing high value crops such as wine grapes, pears, apples and cherries. The Sacramento River District is the largest Bartlett pear growing region in the United States. The BDCP will also destroy vineyards in the emerging Clarksburg Appellation. The loss of Sacramento County farmland and production will negatively impact the regional economy and employment patterns. Job losses in labor-intensive vineyards and orchards will cause extreme hardship for populations least able to adjust.

Finally, Sacramento County agricultural land in the path of the BDCP provides critical foraging habitat for species such as the Swainson’s Hawk and Greater and Lesser Sandhill Cranes. Because of the complementary habitat values and the scarcity of adequate and appropriate alternative foraging sites in close proximity to sanctuaries such as Stone Lakes National Wildlife Refuge and the Cosumnes River Preserve, loss of Sacramento County Delta agricultural land will also have a very destructive impact on local and migratory species.

The EIR/EIS for the BDCP must consider all negative impacts caused by conveyance alternatives and habitat restoration/enhancement t projects. The EIR/EIS must determine how each alternative will impact regional flood control, land use, land values, the local and regional economies, and other species. All of these impacts must be studied, quantified and mitigated.

Thank you for the opportunity to comment at this time.

Sincerely,

Russell van Loben Sels, President
Sacramento County Farm Bureau

CC:
Honorable Dianne Feinstein
Honorable Barbara Boxer
Honorable Dan Lungren
Honorable Doris Matsui
Honorable Dave Cox
Honorable Lois Wolk
Honorable Joan Buchanan
Honorable Alyson Huber
Honorable Roger Niello
Sacramento County Board of Supervisors
Terry Schulten, County Executive
Paul Hahn, Agency Administrator
Keith DeVore, Sacramento County Department of Water Resources
Contra Costa, Solano, Yolo & San Joaquin County Farm Bureau's