



# CALIFORNIA FARM BUREAU FEDERATION

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CALIFORNIA NATURAL RESOURCES AND ENVIRONMENTAL DIVISION  
MAIL ROOM

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November 21, 2008

Secretary Mike Chrisman  
California Resources Agency  
1416 9<sup>th</sup> Street, #1311  
Sacramento, CA 95814

Secretary Linda Adams  
California Environmental Protection Agency  
1001 I Street  
Sacramento, CA 95814

Secretary A.G. Kawamura  
California Department of Food and Agriculture  
1220 N Street  
Sacramento, CA 95814

President Michael Peevey  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

Secretary Dale Bonner  
California Business, Transportation and Housing Agency  
980 9<sup>th</sup> Street, #2450  
Sacramento, CA 95814

Re: Delta Vision Strategic Plan – Blue Ribbon Task Force

Dear Members of the Delta Vision Committee:

The California Farm Bureau Federation (“Farm Bureau”) is a non-governmental, non-profit, voluntary membership California corporation that’s purpose is to protect and promote agricultural interests throughout the State of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California’s largest farm organization, comprised of 53 county Farm Bureaus currently representing over 33,000 farm families and more than 91,000 individual members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California’s resources.

Farm Bureau appreciates the opportunity to provide you with comments on the Delta Vision Strategic Plan (“Strategic Plan”), as authored by the Blue Ribbon Task Force convened under Governor Schwarzenegger’s Executive Order S-17-06, and hopes that you will consider these comments as you develop your recommendations to the Governor and Legislature for implementation of the Strategic Plan. Farm Bureau devoted considerable time and resources toward participation in the Delta Vision process as part of the Stakeholder Coordination Group, and commented extensively during the development of the Strategic Plan. In our view, the Task Force is to be commended for its dedication and thoroughness in tackling one of California’s

most difficult policy problems, even though there remain specific areas of concern and even disagreement with the Strategic Plan that the Farm Bureau would like to highlight for you.

### **1. The Need For New Storage**

One specific policy area which Farm Bureau applauds the Task Force for identifying in the Strategic Plan concerns new facilities for water storage capacity. California's water infrastructure has remained largely static for more than 30 years, in a time during which the population of the state has nearly tripled and in which a host of new environmental regulatory constraints have been added to the system. With the population of California headed towards 50 million residents in the near future, a very fundamental demand problem stands to be exacerbated by new supply-side difficulties: projections of climate change indicate that many of the existing storage facilities, already over-subscribed, will need to be re-operated to provide greater reserved flood control space at the expense of operational flexibility in storage. We therefore believe the Committee should underscore the Strategic Plan's identification of the need for new storage facilities in very strong terms.

### **2. Reasonable Use of Water for Agriculture**

We strenuously disagree with the recommendation in the Strategic Plan that the State Water Resources Control Board "use its authority to determine reasonable use of water over the coming decades to evolve away from the generally accepted practices of diverting surface water for agriculture." (Strategic Plan, Action 4.1.3.c.) This broad recommendation takes a very categorical approach to one of California's most diverse and productive economies, and could promise to constrain the ability of California's farmers and ranchers to provide a reliable and affordable food supply for all of California.

Under California water law, what is the "reasonable" use of water is a fact-specific inquiry, and in point of fact the individual decisions that farmers and ranchers make to irrigate their fields are themselves dependent upon a number of factors. Farm Bureau generally agrees that agricultural use of water, like any beneficial use of water, should strive for any practical gain in efficiency. However, it is simply not economically feasible to deliver water to all crop types on the least water-intensive irrigation technology. Moreover, the recommendation that California's waterscape "evolve away from...diverting surface water for agriculture" is highly questionable in its sheer breadth and singularity, and promises severe disruption to a foundational element of the California human economy. We urge the Committee to reject this improvident element of the Strategic Plan.

### **3. The Delta As An Agricultural Region**

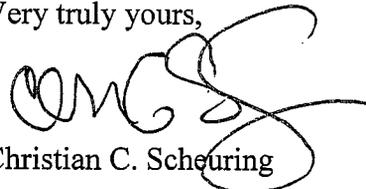
Farm Bureau supports the co-equal goals of restoring the Delta ecosystem and creating a more reliable water supply for California. Within the physical context of the Delta, which is currently a very productive agricultural region, we believe that the Strategic Plan was right to recognize the importance of supporting existing in-Delta agriculture. We also appreciate the

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Strategic Plan's recognition that the Delta's farmers will continue to be the best judges of agricultural business opportunities in the future. Through its recommendations about governance, particularly with respect to the proposed California Delta Ecosystem and Water Council and its relationship to existing institutions, we urge the Committee to demonstrate respect for existing agriculture within the Delta.

Farm Bureau is committed to durable and sustainable solutions for the public policy issues related to the Delta, and is grateful to the Committee for the opportunity to present these comments. Farm Bureau intends to present further testimony before the Committee at the workshop on December 5, and looks forward to that event. Please call me directly in regard to these comments, if you have any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read 'C. Scheuring', with a large, stylized flourish extending to the right.

Christian C. Scheuring

cc: Governor Arnold Schwarzenegger  
John Moffatt, Deputy Legislative Secretary, office of the Governor  
Director Lester Snow, Department of Water Resources  
Director Joe Grindstaff, CALFED Bay Delta Program