Kathy Hunn

From: mary mctaggart [cavelanding@yahoo.com]
Sent: Thursday, May 29, 2008 11:17 AM
To: delores@water.ca.gov
Cc: Kathy Hunn; Laura Schneider
Subject: Scoping Comments - BDCP EIR/EIS

May 27, 2008

Ms. Delores Brown
Chief, Office of Environmental Compliance
Department of Water Resources
P.O. Box 942836
Sacramento, CA 94236

Dear Ms. Brown:

I am a resident of the Lisbon District (RD 307) and represent as well my parents, who own small farm parcels in this district as well as the Pierson District (RD 551). Below are summarized some of my concerns and suggestions regarding the scope of the EIR/EIS process. However I would like to state at the outset that I feel that the bulk of most Delta planning and research to date, including this process, has been marked by unaccountable lacks of interest in and input from those who are closest to the actual land and waters of the Delta and who potentially have the most to lose: Delta residents, communities, landowners, growers. and water users. To ensure that the BDCP has the best chance of succeeding in its stated goals, these lacks should be remedied ASAP.

1) To quote from the BRTF Delta Vision report (November 2007 draft), "When the levees were built, most celebrated the new farmland, and few thought of what might be lost." [emphasis mine] Please assure that the EIR/EIS process study in depth and breadth impacts to existing and future agricultural activities and economies, and the impacts on the Delta riverfront farming communities - their existing and continued economic vitality and historical/cultural/social/recreational value to those who live in the Delta and to urban dwellers in the State at large.

2) A close reading of many documents produced to date by Delta planners yields the strong impression that Delta farmers will be asked to do many things with/on their land alongside or instead of producing crops (i.e. protecting wildlife, reducing subsidence, sequestering greenhouse gasses, and providing recreation and "scenic green open space" for the urban population,etc.). The EIR//EIS must examine the extent to which these "working landscape" requirements could inhibit the optimum production of agricultural product, any diminishing of which might in this era of global food shortages be considered a national security issue as well as detrimental to the agricultural economy of the State. (see Sacramento Bee, April 30, 2008 - "Bio fuel divides grocers, growers" for discussion of whether it is a good idea to divert farmland to the production of ethanol, another non-food product. See also Sacramento Bee, Commentary - May 20, 2008 - "Future of farming: Local, organic, home-delivered" - "We're a business...All of my beliefs about how farming should be done don't mean a thing if we are out of business." - Thaddeus Barsotti, Capay Valley farmer.)

3) The BDCP planners appear to have in mind a fairly extensive transfer of private land to public ownership and/or management. The wisdom of this land transfer alone, regardless of whether the land becomes tidal marshes or is managed to achieve some of the goals in 2) above must be thoroughly studied to determine whether government, State or Federal, has either the financial means or political

will to serve as a successful long-term steward of such a complex and vital resource. (See Sacramento Bee, May 21, 2008 - "State Parks on list of top endangered sites - underfunding threatens the California system, preservation group says"). The EIR/EIS should examine the extent to which the State and Federal governments can actually fund and carry out the Plan in view of examples to the contrary including the failed CAL-FED process, the recent Prospect Island fiasco, the inability of Stone Lakes NWR to successfully control invasive species, and some 10 years of planning (and money spent) on the North Delta Flood Control & Ecosystem Restoration Project with little funding yet in sight to carry it out (DEIR hearing February 21, 2008). Other impacts of private-to-public land transfer, such as those on funding for and operations of local reclamation districts, County services, fire districts, water agencies, State water quality and water rights programs, local school districts, etc. must be carefully looked at both for each individual entity and for the social/economic/cultural impacts on the fabric of Delta community life.

4) BDCP should treat the Delta north of Walnut Grove differently from lands to the south. North Delta lands, for example, are higher, have much less history of flooding, have mineral soils instead of peat, and tend to have a higher population density than lands to the south. Most of the Delta legacy towns are to the north. The building of large "tidal" marshes might eventually depopulate these areas due to health and aesthetic effects as well as physically disrupting existing social interconnections. Farming in the area of these marshes could also be hampered by humidity changes, invasive species, disruption of the essential movement of farm equipment, and new seepage issues. If ring levees were built around these towns, there could also be disruption to traffic circulation, essential public safety services, degradation of air quality, etc., resulting in further depopulation. (If eventual depopulation of the Delta is an unstated goal of the BDCP or any of its parties, that goal should be made public.)

5) What might be the effects of higher humidity caused by manufactured tidal marshes on local weather patterns, including for nearby urban areas? Please see Sacramento Bee, October 7, 2007 "No guarantees on Delta breeze - earthquake, flood could turn off our air conditioner, experts say" for the effect of new large bodies of water in the Delta on cooling breezes in the Sacramento area. This loss of cooling would increase A/C energy costs and have unforeseen impacts on public health, agricultural production, and terrestrial species in and near the Delta.

Thank you for your consideration.

Mary McTaggart
34840 S. River Road
Clarksburg, CA 95612
916-744-1945
cavelanding@yahoo.com

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