

December 22, 1999

To: Rick Breitenbach
From: Margit Aramburu
Subject: Comment on December 1999 Summary of Changes

Rick : In Section 7.1, you propose to add language which states:

"The improvement of levees in the Delta could make these areas more attractive for urban development, and could contribute to growth-inducing impacts in that Region."

I got a copy of the comments that stimulated that change from Rob Cooke. Comment IA-7.1.10-2.

The proposed changes to levees will not change the level of protection from agriculture to urban. The levee changes will only make the levees more stable and about six inches taller. All the agricultural lands in the Delta are so designated in the County General Plans; urban development is not allowed in the ag zones. Changes to the County General Plans could be appealed to the Delta Protection Commission; the Commission can block such general plan amendments. In addition, most of the land in the Primary Zone is under Williamson Act contracts.

The proposed mitigation action, "focus on lands in proximity to where any conversion impact takes place", does not appear to address the issue.

I would suggest dropping the proposed new language.