



Electronically Submitted

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Delta Protection Advisory Committee
2101 Stone Blvd.
Suite 200
West Sacramento, CA 95691

Re: Opposition to the Clarksburg Branch Line Trail Extension

Dear Committee Members:

California Farm Bureau Federation (“Farm Bureau”) submits this letter to express its opposition to the proposed Clarksburg Branch Line Trail Extension (“Project”). Farm Bureau represents more than 30,000 farm and ranch families across California, including members who own and operate active agricultural lands that would be directly and substantially affected by this Project in Yolo County and within the Sacramento–San Joaquin Delta.

Farm Bureau supports recreational and active transportation projects when they are responsibly sited and compatible with surrounding land uses. This Project, however, is fundamentally incompatible with active agricultural operations and Delta land-use priorities. As proposed, it would impose significant, permanent, and largely unavoidable impacts on working farmland, while relying on an environmental review approach that fails to fully disclose or address those impacts.

Significant and Unavoidable Harm to Active Agricultural Operations

The Project would bisect and fragment actively farmed lands that have remained in continuous agricultural production for generations. The City of West Sacramento’s Preliminary Environmental Study (“PES”) acknowledges that the Project would convert agricultural land to a non-agricultural transportation use, including lands designated as Prime Farmland and Farmland of Statewide Importance. Under CEQA, the conversion of such land is recognized as a significant environmental impact. (Pub. Resources Code, § 21060.1; CEQA Guidelines, § 15365.)

The impacts extend far beyond acreage loss. The Project would disrupt irrigation and drainage systems, interfere with farm access and equipment movement, and introduce persistent conflicts between agricultural operations and public recreational use. The Project description itself confirms that extensive clearing, grading, base placement, fencing, signage, and eventual paving would occur through the center of working farms.

California courts have consistently recognized that projects which impair agricultural access, operational efficiency, or land integrity may result in significant environmental and economic

impacts even where only a portion of farmland is physically converted. (*Environmental Council of Sacramento v. City of Sacramento* (2008) 142 Cal.App.4th 1018, 1032–1033.) Here, the Project's linear intrusion through multiple farms would functionally divide fields and constrain operations in a manner that cannot be meaningfully mitigated.

Direct Conflict with Right-to-Farm Protections and Delta Agriculture

Agriculture is not a secondary land use in Clarksburg or the surrounding Delta, it is the dominant and defining use. State and local Right-to-Farm protections exist precisely to prevent incompatible development from undermining agricultural operations through land-use conflict and incremental pressure. (Civ. Code, § 3482.5; Yolo County General Plan, Agricultural and Rural Policies.)

The Project would permanently introduce a high-use recreational corridor into the middle of active farming areas, guaranteeing conflicts related to noise, dust, chemical applications, early-morning operations, and heavy equipment use. These conflicts are predictable and unavoidable. Once established, the trail would permanently constrain lawful farming practices and expose farmers to increased liability, enforcement scrutiny, and operational limitations outcomes that directly contradict the purpose of Right-to-Farm protections.

Failure to Meaningfully Evaluate Feasible, Less-Damaging Alternatives

CEQA requires public agencies to avoid or substantially lessen significant environmental impacts where feasible, including through the evaluation of project alternatives. (Pub. Resources Code, § 21002; CEQA Guidelines, § 15126.6.) That mandate is especially important where a project threatens the long-term viability of agricultural land.

Here, feasible alternatives that could reduce or avoid impacts to farmland, such as alignments along existing levees or other infrastructure corridors, do not appear to have been meaningfully analyzed. Project materials suggest that alternatives were dismissed primarily based on ownership or prior planning designations, rather than on a comparative assessment of agricultural and environmental impacts. That approach is inconsistent with CEQA's substantive requirements and undermines confidence that the Project represents the least-damaging option.

Serious Deficiencies in Environmental Review and Improper Segmentation

Farm Bureau is deeply concerned by the apparent segmentation of environmental review and reliance on categorical exemptions under CEQA. CEQA requires agencies to analyze the whole of the action and prohibits dividing a project into smaller components to avoid full environmental review. (CEQA Guidelines, § 15378; *Laurel Heights Improvement Assn. v. Regents of Univ. of California* (1988) 47 Cal.3d 376, 396.)

The Project is plainly a multi-phase effort intended to result in a fully paved, seven-mile multi-use trail with associated infrastructure. Yet environmental review appears to be proceeding

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incrementally, with early phases treated as categorically exempt despite being designed to enable later, more intensive development.

Categorical exemptions must be narrowly construed and are unavailable where there is a reasonable possibility of significant environmental effects due to unusual circumstances. (CEQA Guidelines, § 15300.2(c); *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1092.) Given the Project's scale, acknowledged farmland conversion, floodplain location, and proximity to sensitive habitat, reliance on exemptions raises serious legal and policy concerns.

Harmful Precedent for Delta and Statewide Farmland Protection

Beyond its immediate impacts, this Project presents troubling policy implications. Approving recreational infrastructure that bisects active farmland without comprehensive environmental review or meaningful alternatives analysis signals that agricultural land may be treated as a convenient corridor for non-agricultural development.

That precedent is inconsistent with California's stated commitment to agricultural land preservation and Delta stewardship. Incremental fragmentation of farmland erodes agricultural viability, threatens food production, and undermines the economic and cultural foundation of the Delta.

Conclusion

For all of these reasons, the California Farm Bureau strongly urges the Clarksburg Citizens Advisory Committee to oppose the Clarksburg Branch Line Trail Extension as currently proposed. At a minimum, the Project should not proceed unless and until comprehensive environmental review is completed, feasible alternatives that avoid or substantially reduce agricultural impacts are fully evaluated, and enforceable measures are adopted to protect farming operations and farmland viability.

Farm Bureau appreciates the opportunity to provide comment and remains committed to working constructively toward solutions that respect both recreational objectives and the irreplaceable value of California's working lands.

Respectfully submitted,



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