

Letter Code	Commenter	Affiliation	Comment	Response	Change in CVFPP?
FEDERAL COMMENTS					
F_USFW1-07	US Fish and Wildlife	US Fish and Wildlife	General Comment – There are many statements which relate to the difficulty of doing multi-benefit projects and operations and maintenance due to regulatory barriers. From the Service’s perspective we have multiple tools to handle permitting, but only recently has DWR been moving forward on pursuing the use of these tools to get coverage for the species listed under the federal Endangered Species Act. Given that the Plan mentions other programs that have used various permitting measures outside of DWR, it would seem that the barriers may be more internal than actual permitting barriers. We realize there are other permits and permitting agencies and that these statements may apply to those permits. However, the document currently lumps them all together rather than calling out the specific potentially problematic permits. Blanket complaints on permitting can create negative connotations with the local maintaining agencies with smaller budgets and fewer resources which do have legitimate issues with obtaining permits.	DWR’s pursuit of a variety of tools is not a recent endeavor, and there are a host of other laws beyond the Endangered Species Act that DWR and other action agencies must comply with, which adds to the complexity of permitting. The challenges of navigating the current permitting landscape and need to work collectively on the matter has been acknowledged in the CVFPP and other documents, including but not limited to, the California Water Action Plan, California’s Flood Future, the Central Valley Flood Protection Board Advisory Committee’s Recommendations to the Board, and the Delta Plan Interagency Implementation Committee Agency Review of EcoRestore Project Tracking Matrix – Final Report. These documents are products developed from input from a broad range of representatives from local, state, and federal agencies, industry, environmental NGOs and others. The purpose of the discussion of this matter in the CVFPP is not to catalog every issue or barrier that exists, but to highlight that challenges exist, suggest potential areas and paths for partners to work together on to collectively achieve better outcomes, and draw attention to areas where resources are needed to support interagency collaborative solutions.	No
F_USFW1-08	US Fish and Wildlife	US Fish and Wildlife	Page 2-23 Perspectives on Hydraulic/Ecosystem Baseline and Program Phasing – Here is one example of our general comment above. We have a conservation banking program that can bank credits created for species for later use. If this is not what you are referring to in this problem statement perhaps you can expand on what you mean by ecosystem baseline and specifically what regulatory requirements do not work.	This discussion is not intended to single out the Service or only federal laws or programs, and was not intended to discuss mitigation credit banking, which is a very helpful tool. There are a host of federal and state laws applicable to flood projects. Instead, the discussion was intended to start a dialogue regarding how ecosystem baseline is measured and accounted for over time for regional large scale multi-decade, multi-benefit flood system improvements. For example, individual project level improvements in one area of a region may improve the ecological baseline beyond what is captured in mitigation credits, or as project mitigation. There is typically no accounting of that improvement or “credit” applied when the next phase of the system improvements are ready to be constructed at a project level aspect, at least pursuant to CEQA and NEPA. For these laws, the baseline for an individual project is typically set at the Notice of Preparation stage for CEQA and the point when the no project alternative is being described for NEPA in relation to the other project alternatives. There is at least one new state law which begins to address this issue for the purposes of regional planning and mitigation banking under the California Endangered Species Act (CESA)--AB 2087 which added Chapter 9 to CESA entitled “Advance Mitigation and Regional Conservation Investment Strategies.” The State looks forward to exploring use of this tool and other potential options to assist with planning of the regional large scale multi-benefit system improvements in the future.	No
F_USFW1-09	US Fish and Wildlife	US Fish and Wildlife	Page 2-23 Perspectives on Operations and Maintenance of the Flood System – This problem statement does not seem to address other factors that affect operations and maintenance. While you mention aging infrastructure, but there is no mention on possible design deficiencies. In other words, the original design may no longer work for the river and weather systems that we currently have. Additionally, climate change is going to likely result in continued changes to the system and operations and maintenance as currently done may not keep up with these changes. It is our understanding that is the purpose of the system-wide improvements; however we believe that message is not often said nor heard.	Thank you for your response. The list of issues provided on page 2-23 was not meant to be a comprehensive list of O&M issues. It was intended to demonstrate a perspective on some of the top points discussed among stakeholders. For a more complete discussion on OMRR&R related issues, please see the supporting document Draft Flood System Long-Term Operation, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R) Cost Evaluation Technical Memorandum.	No
F_USFW1-10	US Fish and Wildlife	US Fish and Wildlife	Page 3-44 Development of Multi-benefit Projects – Text within this section says that implementation of multi-benefit projects is hindered by environmental regulatory frameworks. Multi-benefit projects are an opportunity to incorporate all aspects of a project, such as operations and maintenance, in the permitting of the project. We believe the Plan should encourage multi-benefit projects in the plan area.	It is agreed that multi-benefit projects are an opportunity to incorporate all aspects of a project in the permitting of the project. Numerous applicable laws, policies, practices, and funding streams were not necessarily designed with multi-benefit projects in mind, and the unique implementation challenges these types of projects can bring. This section highlights some of the potential barriers, and it references more than just permitting. The Plan does encourage multi-benefit projects, and the intention in highlighting challenges is to draw attention to areas where resources and collaborative efforts are needed so the challenges can be addressed and the desired outcomes of the multi-benefit approach can be realized.	No
F_USFW1-11	US Fish and Wildlife	US Fish and Wildlife	Page 3-45 Western Yellow-billed Cuckoo – The way the special habitat management considerations are discussed on this page it sounds as though the proposed critical habitat designation requires that these actions be carried out. These special management considerations are actions based off of threats identified in the listing document of the yellow-billed cuckoo. Implementation of these special management considerations would aid in the recovery of the species but are not required by Federal agencies when evaluating effects to critical habitat.	It is not clear from the language in the Federal Register that permitting staff across the geographic areas this critical habitat designation encompasses would not treat these considerations as requirements. It does not appear to contain guidance for staff in how to reconcile important yet conflicting needs. This was highlighted as one specific potential issue to help draw attention to areas where resources and collaborative efforts are needed so the desired outcomes of the multi-benefit approach can be realized.	No
F_USFW1-12	US Fish and Wildlife	US Fish and Wildlife	Page 3-46 Coordination with Federal Agencies – We suggest you reword your definition of the Endangered Species Act. Since this is in the section regarding federal agencies, we assume you are referring to the section 7 portion of the Endangered Species Act. The following text describes section 7 - ESA charges Federal agencies to aid in the conservation of listed species, and section 7 (a)(2) requires the agencies, through consultation with the Service, to ensure that their activities are not likely to jeopardize the continued existence of listed species or adversely modify designated critical habitats.	Thank for your comment. We have added your proposed text relating to the Endangered Species Act to page 3-46 of the Plan.	Yes

NOTE: THE COMMENTS PRESENTED IN THIS LOG RELATE TO THE 2017 CVFPP UPDATE ONLY. COMMENTS RELATED TO THE SUPPLEMENTAL PROGRAMMATIC EIR CAN BE FOUND WITHIN THAT DOCUMENT.

AUGUST 2017

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F_USFW1-13	US Fish and Wildlife	US Fish and Wildlife	Page 4-36 2nd Bullet – There is a tracking system Corps Regulatory, National Marine Fisheries Service, and the Service uses to track mitigation banking. It is called RIBITS.	Thank you for this information. This is very helpful as we move forward with these recommended actions.	No
F_USFW1-14	US Fish and Wildlife	US Fish and Wildlife	We look forward to working with DWR, the Board and others on the regional planning efforts and development of the Conservation Strategy to follow adoption of the Plan. If you have any questions regarding these comments please contact Doug Weinrich at (916) 414-6563.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
GROUP COMMENTS					
G_AR1-05	John Cain	American Rivers	<p>The Plan Does Not Adequately Manage Flood Risk Associated with Future Urban Development</p> <p>The primary goal of the CVFPP is to improve flood management, but the plan lacks any enforcement policy or risk management strategy to prevent risky development. State law prohibits new urban development in levee protected areas with projected populations of greater than 10,000 people unless the local land use authority can demonstrate “adequate progress” toward the 200 year level of protection by 2025. The plan aspires to provide for 200-year level of protection for urbanizing areas, but it does not actually provide 200-year flood protection or any mechanism to evade laws that prohibit levee protected areas from urbanizing. Instead, DWR appears to have delegated enforcement responsibilities to local land use jurisdictions, significantly increasing the probability that local jurisdictions will improperly allow development and flood risk to increase over time.</p> <p>The plan should require that local land use jurisdictions submit all findings regarding level of protection or adequate progress to the Central Valley Flood Protection Board for scrutiny at public hearings. American Rivers realizes that DWR and the Board may be reluctant to review or approve local agency findings for fear of assuming state liability, but the current policy of looking to other way doesn’t actually resolve the state’s potential liability problem. It simply defers it to post disaster litigation. It is better for DWR and the Board to expose local agency finding is to public scrutiny before more levee protected floodplains are inappropriately or illegally developed. Looking the other way as local agencies make potentially dubious findings regarding adequate progress simply increases the probability that floodplains will be inappropriately developed and that state taxpayers will eventually be asked to compensate for the subsequent loss of life and property.</p>	<p>Pursuant to SB 5, in 2013 DWR developed the Urban Level of Flood Protection Criteria (ULOP) to fulfill the requirements of California Government Code Section 65007(n) to assist local land use authorities, namely cities and counties, with making findings related to an urban level of flood protection or FEMA standard of flood protection before entering into development agreements for property located with a flood hazard zone, approving a discretionary permit or other discretionary entitlement, or a ministerial permit that would result in the construction of a new residence, for a project that is located within a flood hazard zone, or approving a subdivision map that is located within a flood hazard zone. The phrase “urban level of flood protection” is defined by SB 5 as “the level of protection that is necessary to withstand flooding that has a 1-in-200 change of occurring in any given year...” See CA Government Code Section 65007(n). SB 5 does not specify any enforcement authority for ensuring that an urban level of flood protection is reached, but instead relies on the due-diligence of cities and counties to incorporate flood risk considerations into floodplain management and planning. Enforcement of the state law requirements in this regard could occur either through citizen suits or through attorney general action. Any enforcement by the State would need to occur through legislative directive. Likewise, the State is not required to ensure that local land use agencies and other entities achieve 200-year level of protection for their jurisdiction. In addition, any provision that would require the Board to review city and counties findings on this topic would likewise have to occur through legislation.</p>	No
G_AC1-01	Ric Reinhardt	Advisory Committee	<p>The Drafting Subcommittee of the Advisory Committee (AC) that drafted the AC’s recommendations is submitting comments to the Central Valley Flood Protection Board (Board) and providing feedback on the Draft CVFPP 2017 Update, relative to our recommendations.</p> <p>The AC’s adopted recommendations were developed by a broad cross section of Central Valley stakeholders, which represent Local Maintaining Agencies, agricultural groups, environmental organizations, and regulatory agencies. Through a series of meetings and a shared commitment toward seeking common ground, we were able to develop a package of unified recommendations for the Board’s consideration that represents a valuable resource to the Department of Water Resources (DWR) as it seeks to prepare the final Flood Plan. These recommendations represent the broadest consensus amongst our diverse communities, which we view as a synergistic package designed to provide a functional, and implementable, flood plan.</p> <p>To the considerable surprise of many involved, the AC members were able to bring the diversity of occasional opposing interests together in a unified view on a wide range of topics. In large part, this was possible thanks to the time, leadership, and commitment of the Board, in providing support for our process and successful outcome, for which we would like to express our sincere appreciation.</p>	<p>DWR appreciates the feedback from the Drafting Subcommittee of the Advisory Committee (AC) and appreciated being involved with the committee.</p>	No
G_AC1-02	Ric Reinhardt	Advisory Committee	<p>While the AC’s main charge has been completed, and our recommendations were formally submitted to the DWR and the Board in fall of 2016, we have since completed a review of the Draft 2017 CVFPP Update and the Conservation Strategy. We have identified how our recommendations were addressed and have ascertained the ones which may require further action. The attached table reflects the outcome of that comparison process. The Drafting Subcommittee is providing this table to facilitate the fullest integration of the AC’s recommendations into the 2017 CVFPP Update and the Conservation Strategy.</p> <p>It is our understanding that the Board has planned a series of thematic workshops, currently expected to take place in April and/or May. Our hope is that this public workshop process can provide a forum for further discussion and consideration of the key outstanding AC recommendations that are not currently reflected in the Draft 2017 CVFPP Update and the Conservation Strategy. In anticipation of this public forum, we would like to request that, to the extent possible, the workshop format accommodate such an approach. Our intent is not to initiate a new process that would in any way, interfere with the timely adoption of the 2017 CVFPP Update and the Conservation Strategy. Instead, we hope to use this opportunity to effectively work through a relatively limited number of remaining issues. To this end, in order to aid the workshop discussion, we are preparing a separate document with specific proposed language or other resolution of key issues, to be completed in the time for when the Board holds the workshop focused on the Conservation Strategy.</p> <p>Thank you for your time and attention. We look forward to additional discussion with the Board and the presentation at the April workshop.</p>	<p>On April 20th, 2017, DWR and the Board received a document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” that included suggested text changes to the 2017 CVFPP Update. These comments are included in this comment log as comments G_AC2-01 to G_AC2-17. A working meeting was held on May 9th, 2017 among AC members, Board, and DWR to discuss and agree upon suggested text changes. Multiple iterations of draft changes to the 2017 CVFPP Update have been shared with the AC.</p> <p>The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board.</p>	No

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G_AC1-03	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: Subject to recommendations 2 and 3 below, the CS be approved and adopted as a non-regulatory planning framework in the 2017 CVFPP Update. Used as a non-regulatory conservation planning tool and technical framework in connection with the 2017 Update, the Conservation Strategy (CS) document drafted by DWR can help to a) encourage permitting and funding of multi-benefit projects that achieve the goals of the 2017 CVFPP, b) support a regional planning framework with regional objectives that will allow coordination of multi-benefit projects to achieve the goals and objectives at the regional/basin level, c) include means within the 2017 Update to quantify and track project outcomes, and d) meet the requirements of the authorizing legislation.</p> <p>Nov 2016 CVFPP Conservation Strategy: Each of these are addressed in the Nov 2016 Conservation Strategy. a) Ch 7 addresses a regional permitting program; b) Ch 1 - discusses the intent of the CS was to align with RFMP and BWFS efforts c) Ch 8 - how project impacts and conservation actions will be tracked; d) CS goals are based on CVFPA (CA Water Code, Section 9616[a])</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted the following: “As the AC’s original recommendations 1, 2 and 3 seem to have been adequately addressed (as per Ric and Justin’s analysis below) it appears that the AC’s original conditioned recommendation that the CS be approved and adopted as part of the 2017 update has been met and would therefore stand.” No additional changes were discussed at the May 9th CSAC working group meeting. See Comment G_AC2-01 below.</p>	No
G_AC1-04	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 3a. A “Multi-Objective” Preamble” section be added to the CS: Insert language in the “Purpose and Scope” (pg. 1-1, paragraph 4) of the CS to lessen concerns from agricultural, water supply, and flood management stakeholders. See attachment 1 for specific recommended edits.</p> <p>Nov 2016 CVFPP Conservation Strategy: Sec 1.1 Purpose and Scope: Not all of the suggested language was incorporated. “This Conservation Strategy reaffirms the CVFPP’s recognition of the benefits that agriculture provides to ecosystems and flood management. In the Central Valley, agriculture is a dominant land use and represents a vital component of the economy. Agriculture can be compatible with flood system O&M and reduce the need for some types of maintenance. It also provides habitat for some species, including some that are targets of this Strategy. Recognizing these important benefits of agriculture, this Strategy will be implemented in a manner that considers achieving its objectives on working agricultural lands where feasible”</p> <p>CVFPP 2017 Update (selected Recommendations back checked): It should be recognized that LMA’s who are tasked with managing the levees systems have limited financial capacity and are already struggling to meet evolving O&M requirements. Grant programs that provide financial incentives will be an important tool in advancing multi-benefit projects. The additional requirements of habitat creation and subsequent maintenance and monitoring of that habitat are benefits of Statewide and National importance and therefore those costs should not be the sole responsibility of local agencies. For the italics – CS is silent in recognizing that the habitat benefits gained from habitat creation are of State and National importance and that the costs would be offset accordingly.</p> <p>CVFPP 2017 Update: “Enhancing Resilience and Supporting Sustainability. Notes that periodic flooding can have beneficial effects in certain areas, such as lands dedicated to supporting floodplain habitats and certain types of agriculture. “For example floods can benefit water supply, agriculture, and habitat creation”.</p> <p>Page 4-31 – “continue to work with Agricultural Floodplain Ordnance Task Force” to identify and recommend policies and actions that minimize impacts and preserve agriculture....</p> <p>Page 4-31 – “Seek establishment of post disaster agricultural recovery programs” – recognize that LMA’s are maintaining the SPFC – recovery program would assist communities recover after a flood event and keeping areas subject to periodic flooding in agriculture.</p> <p>Page 4-42 – “Seek Federal support for flood risk reduction and ecosystem restoration in rural areas” – recognizes that support of agriculture helps prevent risk intensification in rural areas.</p>	<p>The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board.</p>	No
G_AC1-05	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already.</p> <p>Conservation Strategy AC Recommendation: 3b. The CS include additional Ag land stewardship language: Suggested edits to Section 6.3, Agricultural Land Stewardship, will further affirm a dedication to agricultural land stewardship and agricultural economies and lessen concerns from agricultural stakeholders over potential impacts of the CS. See attachment 1 for specific recommended edits.</p> <p>Nov 2016 CVFPP Conservation Strategy: Pg 5-14: “in addition to habitat effects, CVFPP investigations of modifications to weir operations would also consider effects on public safety and current land uses—in particular, the economic viability of agriculture, which is strongly affected by growing-season length, water supply, and drainage.” Pg 6-10: referring to Weirs and Control structures - “In particular, more frequent and sustained inundation may contribute to food web productivity and fish-rearing habitat. However, in addition to habitat effects, proposals to change bypass flow regimes must include</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted that there was no further recommendation regarding this comment. No additional changes were discussed at the May 9th CSAC working group meeting.</p>	No

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			<p>consideration of potential impacts on current land uses— in particular, the economic viability of irrigated agriculture in bypasses, which is strongly affected by growing-season length, water supply, and drainage.”</p> <p>Pg 6-21 & 22: DWR recognizes that conservation can create legitimate issues or constraints for agriculture—for instance, by converting productive agricultural land to restored habitat or exacerbating weed control issues. Thus, DWR is committed to developing multi-benefit flood projects in collaboration with agricultural stakeholders. The goal of this collaboration is to benefit agriculture while enhancing flood protection and furthering conservation goals.</p> <p>To achieve these benefits, DWR has initiated an effort to improve agricultural stewardship policies associated with flood risk management activities. Several Central Valley DWR programs have recognized the concerns of agricultural interests and are engaging agencies, agricultural stakeholders, and other nongovernmental partners in crafting a comprehensive toolbox of agricultural land stewardship strategies. Using these strategies, farmers and other project proponents can voluntarily pursue solutions that keep farmers on the land, maintain agricultural and economic viability in the project area, provide environmental and habitat benefits, are consistent with State and regional policies, and support the stability of local governments and special districts.</p> <p>Page 6-22 & 23 “Specifically, concerns may be addressed effectively by DWR and other project proponents and land managers using the following key stewardship strategies and tools:</p> <ul style="list-style-type: none">- Help maintain farming, such as by: focusing conservation efforts on public lands or low-productivity lands offered by willing landowners; working with farmers and regulatory agencies to identify and resolve impediments to farm productivity; encouraging voluntary engagement in Safe Harbor Agreements (SHAs) and in CDFW’s Voluntary Local Program; involving and assisting farmers in planning projects, to avoid loss of productive agricultural land, increase compatibility with flood management (e.g., flood-proofing or relocating agricultural facilities), and identify mutual benefits and incentives wherever feasible; providing for agricultural conservation easements; identifying mitigation or assistance that is appropriate for the environmental and social/economic impacts of a project consistent with the mitigation measures of the PEIR for the 2012 CVFPP; and controlling weeds, such as by prioritizing invasive weeds for regional control (see Section 6.2.3).- Provide financial incentives for taking conservation actions on farmland, such as by: compensating farmers to manage agricultural land as habitat for wildlife and providing incentives for farmers to take part in conservation programs, such as the Central Valley Habitat Exchange.-Manage land for purposes other than conventional crop production, such as by: assisting landowners in producing and selling greenhouse gas offset credits and compensating farmers to manage habitat lands.- Focus on economic development and other benefits, such as by: assisting farmers who want to manage their land to incorporate recreation and tourism and studying historical and current land uses and their economic effects on agriculture. <p>Throughout implementation of this Strategy, DWR will monitor the effects of conservation actions on agriculture.”</p> <p>Page 6-25: because agricultural practices strongly affect habitat values and can affect the habitat values of adjacent natural vegetation, implementing wildlife-friendly agricultural practices can contribute to the conservation of target species. These practices also can benefit farmers when they resolve on-the ground practical farming issues, add to public support for agricultural land uses, or are supported with financial incentives.</p> <p>Consequently, DWR will work with other State and federal agencies, and with regional and local governments, to support agriculture that is friendly to fish and wildlife and compatible with flood risk management, using tools such as landowner incentive programs, easements, and management of conserved areas, and based on identified and available funding to the extent feasible. This support would be focused on conserved areas and within the footprints of multi-benefit flood projects. In the context of this Conservation Strategy, wildlife-friendly agriculture refers to practices that (1) increase the habitat value of existing agricultural land for targeted wildlife species or (2) reduce the potential for mortality of targeted species and adverse effects on their habitats in adjacent natural areas.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>Mostly addressed. The DWR states in Section 6.3 that they “...recognize that conservation can create legitimate issues or constraints for agriculture..” and that they are committed to developing “multi-benefit flood projects in collaboration with agricultural stakeholders with the goal to benefit agriculture while enhancing flood protection and furthering conservation goals”. DWR points how they will do this and indicates that they will monitor the effects of conservation on agriculture using an adaptive management approach to assess changes in hydrological, environmental, economic, institutional, and social conditions to identify needed improvements....”</p> <p>CVFPP Update:</p> <p>Table 2-1 Example Performance Tracking Metrics for Economic Stability Outcome “value of all economic productive from floodplain land uses (e.g. floodplain compatible agriculture (\$/yr)”</p> <p>2.3.2 Stakeholder and Partner Perspectives and Continued Conversation on Flood Management Policies – perspectives on land use and floodplain management. “Agricultural lands have economic, environmental, and</p>		

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			cultural value, and impacts to farmland and local agricultural economies should be minimized.” Also identifies that areas for continuing conversation related to “achieving ecosystem benefits while preserving agriculture and associated rural economies”.		
G_AC1-06	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already</p> <p>Conservation Strategy AC Recommendation:</p> <p>4. The 2017 CVFPP Update address the following sub- recommendations relating to avoidance, minimization, and mitigation of agricultural impacts:</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>Pg 6.21: DWR recognizes that conservation can create legitimate issues or constraints for agriculture—for instance, by converting productive agricultural land to restored habitat or exacerbating weed control issues. Thus, DWR is committed to developing multi-benefit flood projects in collaboration with agricultural stakeholders. The goal of this collaboration is to benefit agriculture while enhancing flood protection and furthering conservation goals. Ch 7 discusses how regional permits would incorporate broadly applicable avoidance and minimization measures. But does not necessarily specifically tie to avoiding, minimizing and mitigation of ag impacts.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted that there was no further recommendation regarding this comment. No additional changes were discussed at the May 9th CSAC working group meeting. This comment is related to comment G-AC1-05 above.</p>	No
G_AC1-07	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already.</p> <p>Conservation Strategy AC Recommendation:</p> <p>4a. DWR consider referencing past agricultural and water supply mitigation commitments and strategies from other CVFPP and DWR products in the 2017 Plan, the CS, or both: The group identified language affirming a dedication to agricultural land and water supply stewardship and regional economies in various other CVFPP and CVFPP-related documents. Referencing or incorporating existing mitigation measures and other past commitments and potential strategies to avoid, minimize and mitigate agricultural and water supply impacts, in the CS or 2017 plan could help to address regional concerns by signaling a substantive commitment to stakeholders and communities in the Plan implementation region and should be considered for this purpose.</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>Page 8-17: key partners...Private organizations, including nonprofit groups, advocate for integrated flood risk management projects and funding. Agricultural organizations provide input on ways to improve agricultural stewardship, to reduce impacts from flood actions on adjacent lands, and to support conservation incentives for landowners. Conservation nonprofits assist in developing projects that involve real estate transactions and habitat restoration.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted that there was no further recommendation regarding this comment. No additional changes were discussed at the May 9th CSAC working group meeting. This comment is related to comment G-AC1-05 above.</p>	No
G_AC1-08	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already.</p> <p>Conservation Strategy AC Recommendation:</p> <p>4b. DWR review, update and, potentially, expand the list of 2017 CVFPP environmental commitments with respect to avoidance, minimization, and mitigation of agricultural impacts to address concerns from agricultural stakeholders.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted that there was no further recommendation regarding this comment. No additional changes were discussed at the May 9th CSAC working group meeting.</p>	No
G_AC1-09	Ric Reinhardt	Advisory Committee	<p>Needs more discussion</p> <p>Conservation Strategy AC Recommendation:</p> <p>5. The explanation of “conservation opportunities” in the CS and CVFPP 2017 Update be clarified by defining the flood system footprint used to determine these opportunities, including improved discussion of nesting habitat, and overlapping habitat, agricultural land categories, assumptions regarding percentages of restored habitat, and new versus existing bypass areas. Landowner incentives to develop multi-benefit projects along with collaborative project design, will hinge, in part, on transparent understanding of conservation opportunities, how they are determined, and their footprint. These things are insufficiently explained in the CS and are difficult to follow.</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>Refers to Appendix I and prelim data from BWFS’s. Discussion not included.</p>	<p>Appendices K and L provide most of the details being requested. The Flood System footprints evaluated were based on Sacramento and San Joaquin Basinwide Feasibility Study (BWFS) footprints as of July 2014, Floodplain Restoration Opportunities Analysis (FROA) in 2013 and 2014, and land cover/vegetation mapped from 2009 imagery. The datasets used were those available at the time of the completion of the studies, and don’t necessarily include the most current information, including more current or refined alternatives/options, digital elevation models, and hydrology and hydraulic modeling results. Neither the BWFS alternative footprint restoration opportunity evaluations nor FROA results were intended to provide site-specific details, and most areas would require updated and more refined data and modeling analyses. The estimates of regional restoration opportunities do not include smaller (i.e., narrow waterside riparian restoration sites) or flood infrastructure improvement and floodway reconnection opportunities that may exist both in and near the flood system footprint; including, for example, some potential conservation sites identified by the FloodProtect RFMP (after the development of Appendix L), that could contribute to the regional measurable objectives. In addition, although the Conservation Strategy did not provide specific goals for floodplain agriculture, some reconnected floodplain areas that remain in agricultural and meet the inundation frequency, duration and timing thresholds could contribute to targets for inundated floodplain acres.</p> <p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted: “The explicit inclusion in the 2017 update as a topic in need of further discussion and clarification is sufficient. No further recommendation”. No additional changes were discussed at the May 9th CSAC working group meeting.</p>	No

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G_AC1-10	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>6. The 2017 CVFPP update analyze the extent to which projects put forward in the Regional Flood Management Plans (RFMP) achieve, coincide with, overlap, or diverge from the habitat objectives of the CS’s Conservation Planning Areas. These analyses should be incorporated into planning and made publicly available. A commonly held perception in the regional flood management community is that Measurable Objectives would place undue and onerous burden on Local Maintaining Agencies (LMA). Preliminary analyses of Advisory Committee work indicates that the majority of the habitat objectives in the CS may be met by projects already proposed or considered in RFMPs (Feather and Lower Sac). Refining and extending these analyses to other regions may help reduce concerns about detrimental impacts of the CS measurable objectives on LMAs. In future updates to the CVFPP and the CS, there is a need for analysis and reconciliation of the CS measurable objectives with the projects proposed in the RFMPs.</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>not specifically addressed. Only that the CS is aligned with RFMP and BWFS efforts.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>Addressed. CVFPP Update: “The Conservation Strategy began to inform RFMP development and continues to guide DWR’s prioritization of multi-benefit projects. The CS may continue to inform future phases of RFMP development as funding and other resources allow. Later states “Any actions not selected for the 2017 update may be further developed or refined for consideration in future CVFPP updates.”</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-02 for specific revisions.</p>	No
G_AC1-11	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>7. The CVFPP 2017 Update highlight and provide specific examples of multi-benefit projects that achieve those multiple benefits and also demonstrate integration of agriculture, flood system, water supply, and ecosystem planning. The examples should include specific descriptions and quantitative measures of how and to what extent select projects can help to advance measurable objectives for regional conservation and flood risk improvement.</p> <p>Nov 2016 CVFPP Conservation Strategy: Not discussed here.</p> <p>CVFPP 2017 Update (selected Recommendations back checked): Is referenced in CVFPP update and is the MOOM.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-03 below for specific revisions.</p>	No
G_AC1-12	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>8. The CVFPP 2017 Update ensure transparent documentation of and support for measurable objectives for flood risk improvements. Transparent documentation and support combined with financial incentives for multi-benefit projects in RFMPs will improve the number of projects implemented that contribute to both flood risk and environmental conditions and will facilitate integration of regional flood risk and environmental benefit projects into basin-scale planning.</p> <p>Nov 2016 CVFPP Conservation Strategy: Ch 8 addresses.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>CVFPP Update: Page 2-24: Identifies areas for continuing conversation: i.e. increased costs to local flood agencies and landowners and conversion of productive agricultural land to floodplain habitat – need for a clearly defined term of “multi-benefit”. Identifies that new funding sources and mechanisms may be needed to support multi-benefit project components. And “the cost to implement, maintain, and monitor planned habitat restoration should not be sole responsibility of the LMA’s, because habitat improvement provide benefits to the State and Nation”.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-03 below for specific revisions.</p>	No
G_AC1-13	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>9. The Board consider making a recommendation to the Legislature that additional funding sources be identified and appropriated to achieve the goals of the Central Valley Flood Protection Plan by providing funding for multi-benefit components of projects that can be implemented, in addition to the flood management actions that have been already identified in the RFMPs and Basinwide Feasibility Study. The Legislature specified in Water Code Section 9616 (a)(9) that the Plan increases the quantity, diversity, and connectivity of habitats, where feasible. According to DWR’s lawyers, the majority of the initial funding for the plan (Proposition 1E, 2006) provided funds for flood improvement projects and mitigation, but not for the multi-benefit purposes of Section 9616 (a)(9). To enable progress over time toward achieving intended multi-benefit objectives of the CVFPP, beyond a base level of simple mitigation, the AC feels there is a need to both identify additional funding sources to implement multi-benefit projects and structure DWR’s grant process to financially incentivize multi- benefit projects. Successfully implementing multi-benefit projects will additionally require that projects are fully funded and that funding sources are available to implement all project components.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-05 below for specific revisions.</p>	No

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			<p>Nov 2016 CVFPP Conservation Strategy: Page 8-13 &14: DWR’s Statewide Flood Management Planning program has produced a financing report, California’s Flood Future Phase I: Recommendations for Mapping the State’s Flood Risk, Attachment I: Finance Strategies (DWR 2013), that addresses flood management funding in a statewide context. The attachment presents recommendations about funding and investment strategies needed to establish long-term sustainable flood risk management. It provides information about funds used historically for flood risk management in California, existing and proposed mechanisms for funding flood management, and the funding challenges facing flood management agencies. Multi-benefit projects will attract funds that typically are not used for single-purpose flood management projects. For example, recent integrated floodplain enhancement projects at the mouth of the Tuolumne River (Dos Rios Ranch and Hidden Valley Ranch), which provided benefits related to flood management, ecosystem enhancement and conservation, and agriculture, secured funding from DWR, U.S. Department of Agriculture conservation programs, and the State’s Wildlife Conservation Board. Cost sharing with other conservation plans in the Sacramento and San Joaquin Valleys (e.g., California EcoRestore and the SJRRP) could also be an important source of funding for multi-benefit projects that is not available to single purpose flood projects.</p> <p>CVFPP 2017 Update (selected Recommendations back checked): Addressed in CVFPP update Ch 4 as long term strategy to work on for next update. There is a list of ongoing investments Table 4-3 and Table 4-4 identifies Funding and Funding Mechanisms by State, Federal and Local Entities. Many of which are new funding mechanisms.</p>		
G_AC1-14	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 10. State funding be provided to RFMPs for: a. Design of RFMP projects to integrate and reconcile CS measurable objectives and regional priorities; b. Design of RFMP projects to support flood safety and CVFPP multi-benefit objectives as informed by the CS measurable objectives at the basin scale; c. Quantify the individual and collective contribution of RFMP projects toward meeting the objectives of the CVFPP by advancing both the CS measurable objectives and flood management objectives; and d. Provide incentives and funding to support planning and implementation of multi-benefit flood projects in areas with disadvantaged communities.</p> <p>Nov 2016 CVFPP Conservation Strategy: No specifics on funding for RFMP’s to meet CS. Pg 8-19: Locally led RFMPs will identify, describe, prioritize, and develop funding strategies for regional projects, consistent with their goals and objectives. In support of successful, effective, and well-funded plans, DWR will use this Strategy to highlight the permitting, flood risk management, ecosystem, and other benefits of integrating ecosystem restoration into projects identified in regional plans. DWR will subsequently review RFMPs during BWFS formulation—an opportunity for DWR to articulate and promote State interests to regional planners and stakeholders (e.g., by emphasizing the advantages of a regional permitting approach). During its review, DWR will develop an understanding of potential RFMP actions that could have local and systemwide hydraulic benefits and impacts, as well as an understanding of the overall benefits and impacts, cost-effectiveness, ecosystem restoration opportunities, local priority rankings, and local financing capabilities of these actions. Individual funding decisions for RFMP measures will be made in the context of policy guidelines and regulations established for implementation programs.</p> <p>CVFPP 2017 Update (selected Recommendations back checked): Page 2-25 - identifies this exact comment under “Perspectives on Governance and Institutional Support” as an item for “Areas for Continuing Conversations”.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-06 below for specific revisions.</p>	No
G_AC1-15	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 11. The Board request the Legislature appropriate funds to create expanded habitat mitigation banking opportunities and incentivize private landowner participation in expanded ecosystem service markets, as a potential means to cover design, permitting, implementation, ongoing operations and maintenance, and greater engagement by partner agencies over the long-term.</p> <p>Additionally, the CVFPP 2017 Update could identify a mechanism to fund long-term maintenance costs for multi-benefit projects. Examples of potential sources of long term O&M funding could include a system for habitat-based crediting that would provide: a. Expanded private mitigation banking opportunities and ecosystem service markets; b. Payments to private landowners for actions voluntarily undertaken to achieve ecosystem benefits and habitat uplift related to O&M activities, and c. State funding for O&M on projects that provide a system- level benefit.</p> <p>Nov 2016 CVFPP Conservation Strategy: CS does not propose or suggest legislative requests - just indicates that the Measurable Objectives may help to inform the need for future funding. Sec 8.2 Funding Approach “Ecosystem improvements....would be funded and implemented...as part of implementing CVFPP”. In terms of planning for funding, refers to DWR’s financing report “California’s Flood Future Phase I”. pg 8-14 In addition to future State and federal authorizations and State bond</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-07 below for specific revisions.</p>	No

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			<p>funds for conservation, examples of State and federal conservation programs that could provide funding for multi-benefit projects include the State’s Wildlife Conservation Board programs, the Central Valley Project Improvement Act Restoration Fund (USBR), Land and Conservation Fund (multiple federal agencies), Cooperative Endangered Species Conservation Fund (USFWS), Restoration Partnership Grant Program (NMFS), Wetland Reserve Program (Natural Resources Conservation Service [NRCS]), and the Environmental Quality Incentives Program (NRCS). Some multi-benefit projects also may be eligible for grants from the State’s Greenhouse Gas Reduction Fund.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>Page 4-33: Under “collect information on the status of proposed and existing projects for use in updating the CVFPP and its supporting documents” – “it is recommended that the RFMP’s be continued, to the extent sufficient resources allow.”</p>		
G_AC1-16	Ric Reinhardt	Advisory Committee	<p>Needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>12. The Board considers recommending that the Legislature provide funding to other state agencies that have primary responsibilities affected by the Plan so that these agencies can more directly participate in project planning, design, and operation and maintenance. Additionally, we recommend that the CVFPP 2017 Update include language to specifically identify long-term dedicated funding needs for participation by responsible state agencies and identify or suggest specific pathways through which that funding may be pursued. Resource agencies face limitations in terms of available funding to support full and timely engagement in flood project planning and implementation. Existing agreements provide a useful model to support the expanded and comprehensive participation of resource agencies in the CVFPP process. However, those agreements are short-term arrangements and do not address the full implementation period of the CVFPP. Identifying and pursuing long-term dedicated funding for these agencies would help to support successful implementation of the CVFPP.</p> <p>Nov 2016 CVFPP Conservation Strategy: Actual funding needs not provided in CS.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-08 below for specific revisions.</p>	No
G_AC1-17	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>13. The CVFPP 2017 Update (and companion State Systemwide Investment Approach) describe the need for improved incentives and cost sharing by: a. including language that specifies applicable cost share funding sources going forward including increased cost share by the State (primarily), the federal government, and other existing and future funding programs; b. specifying the necessity and intention for state cost share to be available through project planning, implementation, and O&M; c. including language that recognizes need for additional incentives and increased cost share by the State for project planning and implementation in areas with disadvantaged communities.</p> <p>Nov 2016 CVFPP Conservation Strategy: Pg 8-13: refers to the Investment Strategy - currently not published for review.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>13 a: Section 4.5.3All cost-sharing partners will be asked to contribute significantly more than they have in the past, as historical revenue sources would only be able fund approximately 20% of needed flood system investment. The State needs Congress to support State-sponsored flood risk reduction and ecosystem restoration projects in the WRDA and to enable USACE and FEMA to focus on more proactive participation in State and local efforts. Annual appropriations from the State general fund should be increased in the near term, and new funding mechanisms and three precedent-setting general obligation flood bonds must be secured in the longer term. While more revenue is required from federal and state governments, local governments will also need to raise additional revenue through mechanisms such as Proposition 218 and any future amendments to that proposition, to meet increased O&M and their cost-share requirements.</p> <p>13b: Not evident.</p> <p>13 c: CVFPP Update Has this specific above reference language in “Perspectives on funding” “Areas of Agreement”.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-09 below for specific revisions.</p>	No
G_AC1-18	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>14. The Board addresses the need for a viable process for long-term OMRR&R permitting at a regional or system-wide scale. This process should allow for necessary changes over time to habitat in a specific location, while at the same time seeking to maintain and improve the overall mosaic of habitat values within the system as a whole. We recommend the Board seek to realize this vision by developing an approach and initiating a state federal process to develop and implement this approach by the 2022 CVFPP Update. Long-term permitting of OMRR&R at a larger scale is expected to be more cost-efficient, more effective, and to provide opportunities for environmental uplift while accomplishing needed management actions.</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>Ch 7. DWR discusses development of regional permitting programs. Page 7-2 his regional approach represents a</p>	<p>The State is currently working on Environmental Permitting Operations and Maintenance (EPOM) program to obtain a streamlined permitting strategy for the two State Maintenance yards. We are also investigating applicability and benefits that could evolve from this program for Local Maintaining Agencies (LMAs). In addition, the State is working on a pilot program in the Feather River watershed for regional permitting. Draft Flood System Long-Term Operation, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R) Cost Evaluation Technical Memorandum also discusses permitting issues. Further, the State is developing a Multi-Objective Operation and Maintenance TM that will discuss permitting issues, strategies used, and lessons learned from five case studies in other parts of the State. These case studies could possibly inform maintenance best management practices in the State Plan of Flood Control (SPFC).</p> <p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text</p>	No

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			more predictable, cost-effective, and efficient process than project-by-project permitting, and one that supports coordinated mitigation efforts focused on improving ecosystem functions, resulting in better conservation outcomes and reduced costs for the O&M and improvement of the SPFC page 7-3: given the number and complexity of existing regulatory permits and approvals, along with the unique flood and environmental opportunities presented by the CVFPP, DWR intends to work with public safety and environmental regulatory agencies to formulate recommended changes to State and/or federal legislation, policies, and/or procedures to improve the efficiency and effectiveness of the approval process for this program in the long term. DWR’s programs for improving environmental compliance are further described below in Section 7.5. CVFPP 2017 Update (selected Recommendations back checked): Page 3-32 -The State will need to work with local agencies and the State legislature to establish new State and local funding mechanisms that are applicable for O&M activities and can be relied upon for consistent revenue from year to year.	changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-10 below for specific revisions.	
G_AC1-19	Ric Reinhardt	Advisory Committee	This has been partially addressed, but needs more discussion. Conservation Strategy AC Recommendation: 15. The Board, with help from DWR and other agencies and stakeholders, initiate and facilitate an improved environmental permitting process that will allow multi-benefit projects to be a. More readily accomplished, b. More cost-efficient, c. Satisfy legal requirements, and d. Achieve CVFPP goals. The permitting process should allow bundling of projects within and across regions to collectively achieve multiple benefits, and reduce regulatory restrictions and mitigation requirements overall. The current environmental permitting system is inefficient and expensive, and is a significant impediment to supporting the goal of environmental uplift and accomplishing needed management actions within the flood system. While multiple avenues to address this need have been recommended, explored, proposed and, on a limited basis, actually implemented (e.g., HCPs, advanced mitigation), the need for significant improvement remains. Nov 2016 CVFPP Conservation Strategy: Ch 7 outlines how DWR, local, State and Fed stakeholders and agencies need to work on an improved permitting process to allow multi-benefit projects	The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-11 below for specific revisions.	No
G_AC1-20	Ric Reinhardt	Advisory Committee	This has been partially addressed, but needs more discussion. Conservation Strategy AC Recommendation: 16. The CVFPP 2017 Update specify the need for and initiate a summary and analysis of any innovative permitting approaches that have worked, where problems have been encountered, and also describe any promising new approaches or initiatives that might be pursued in the future. Such an analysis would facilitate and inform the development of a new or revised permitting approach. Efforts to design an improved permitting process could be initiated, in part, with an evaluation of promising new approaches or initiatives. Nov 2016 CVFPP Conservation Strategy: Ch 7 - DWR acknowledges that it is in various stages of pursuing several opportunities to improve environmental Compliance (pg 7-2) in addition to developing a regional permitting program. Pg 7-6 Describes HCP for Feather River.	The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-12 below for specific revisions.	No
G_AC1-21	Ric Reinhardt	Advisory Committee	This has been partially addressed, but needs more discussion. Conservation Strategy AC Recommendation: 18. The Board considers procedures to improve monitoring and enforcement of its easements and better addresses the need for on-going channel maintenance. There have been suggestions that some easement requirements—for example, with respect to flood carrying capacity and encroachments—are not being met, and should be more rigorously and systematically monitored and enforced. Similarly, some Advisory Committee stakeholders have concerns that DWR and State of California are not adequately performing ongoing channel or bypass maintenance within the State System of Flood Control. Necessary maintenance should also be considered as part of any streamlined permitting approach under the CVFPP. Maintenance activities should be informed by the CS and should be designed to be compatible with environmental goals, which will ease permitting. Nov 2016 CVFPP Conservation Strategy: Page 1-3: It is DWR’s intent to integrate environmental restoration actions with flood system O&M and capital improvements in a manner that increases the resilience of the flood management system and supports the State’s efforts to adapt to climate change. Within this context, environmental restoration actions will be an important element of the proposed strategies for improving flood system permitting efficiencies. However, the Conservation Strategy was crafted with an understanding of the evolving regulatory framework, which at times imposes	The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-14 below for specific revisions.	No

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			<p>conflicting mandates on DWR and other agencies with responsibility for flood system O&M and capital improvements. Foremost among these conflicting mandates are the federal flood system maintenance criteria codified in 33 Code of Federal Regulations (CFR) 208.10, which require rigorous maintenance of flood system integrity and capacity, and the host of environmental protection laws enacted mostly after the State accepted responsibility for maintenance of federal project features. In some cases, it is not possible to comply with both federal project maintenance and environmental protection imperatives. Consistent with and anticipating the resolution of conflicts among mandates, this Conservation Strategy seeks to encourage restoration consistent with required flood system O&M as a primary objective.</p> <p>Page 2-8 - DWR recognizes the problem - “In particular, more stringent permitting and mitigation requirements exacerbate the funding challenges faced by flood managers and complicate the performance of O&M. Funding of flood risk management improvements and O&M has been inadequate and unreliable, which has hindered the ability of local flood management agencies to achieve flood risk reduction goals and has contributed to maintenance backlogs. Therefore, this Strategy addresses the need to both improve ecosystems and reduce the effects of regulatory compliance on flood management.</p>		
G_AC1-22	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>23. The Board develops and implements a transparent process, independent of environmental permitting, that applies the CS and measurable objectives for both ecosystem uplift and improved flood management to assess and track the contribution of future projects to a functional flood system. A primary opportunity of measurable objectives is the ability to track and quantify progress towards a desired outcome. The CVFPP, including the CS, provides a transparent vision for a functional flood system that simultaneously meets ecosystem and flood management objectives. This, in turn offers the Board the opportunity to track the progress of that vision being realized through time, as projects come before them, and to make recommendations, consistent with the objectives, that support and facilitate flood system function. That the CVFPP 2017 Update, to the extent possible, describe and provide guidance related to how flood system conditions, including both ecosystem and flood performance, should be monitored and tracked.</p> <p>Nov 2016 CVFPP Conservation Strategy: Pg 8-4 Depends on permit process, Figure 8-2 concept.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” included suggested text changes. These text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-14 and comment G_AC2-16 below for specific revisions.</p>	No
G_AC1-23	Ric Reinhardt	Advisory Committee	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation:</p> <p>24. The CVFPP 2017 Update describe an ongoing process for assessing understanding of the hydraulic setting of the flood system, to help identify both: 1) maintenance needs to support flood conveyance and 2) where enhanced or modified habitat conditions can be safely accommodated from a hydraulic perspective. This will help to inform the planning of maintenance activities to allow better adaptive management of the system as a whole. It will generate better information to assess whether maintenance (e.g., sediment removal) to restore conveyance is hydraulically necessary. Similarly, such information will help to determine if deferral of maintenance or even enhancement of vegetative conditions for habitat purposes is feasible and not in conflict with conveyance goals.</p> <p>Nov 2016 CVFPP Conservation Strategy:</p> <p>page 6-22: Using an adaptive management approach (see Section 8.0, “Implementation”), DWR will assess changes in hydrological, environmental, economic, institutional, and social conditions to identify needed improvements. Already, to support better understanding of the potential financial impacts of large-scale restoration activities on local economies, DWR has commissioned a study in the Sacramento Valley to quantify how many acres have been converted from agriculture to habitat during the last 20 years and the economic impacts on local communities of that conversion.</p> <p>CVFPP 2017 Update (selected Recommendations back checked):</p> <p>Page 4-36: Identify policies and laws which may need updating or revisions to support adaptive management of multiple benefits (S/F/L). In cooperation with the USACE and LMAs, the State would identify those policies and laws which may need updating or revisions to incorporate habitat and sensitive species management best management practices (BMPs), and appropriate hydraulic and ecosystem performance indicators to support adaptive management of flood management infrastructure, ecosystem processes, and habitats.</p>	<p>The April 20th AC document titled “Conservation Strategy Stakeholder Advisory Committee Follow-On Review of Final Draft Conservation Strategy and Draft 2017 Update of the CVFPP” noted the following: “See Recommendation 18”. Specific text changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-14 and G_AC2-17 regarding Recommendation 18 below for specific revisions.</p>	No
G_CCVFCA1-01	Melinda Terry	California Central Valley Flood Control Association	<p>The California Central Valley Flood Control Association appreciates the opportunity to review the October 2016 Stakeholder Review Draft Basin-Wide Feasibility Study for the San Joaquin Basin.</p> <p>The Association has not been actively involved in the development of this study, but would like to be going forward. While a number of problems are identified in the study, what appears to be one of the most significant issues are the implications of climate change to increased flood risk. We have an interest in the climate change analysis and as the report states “the effect of climate change on extreme flood events is an emerging science with significant uncertainties”. We believe the climate change analysis should be peer reviewed and we would like to have a representative participate in this review.</p>	<p>Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation for the San Joaquin Valley.</p> <p>Incorporating Climate Change into the CVFPP and BWFS is necessary to assess the vulnerabilities and true costs of managing flood waters to protect the SPFC for the intended life of our structural / non-structural investments. Peer reviews have been undertaken by both MBK Engineers and David Ford Consulting Engineers for DWR. Recommendations from the reviews were addressed during the subsequent final phase of the technical analyses that supports the 2017 CVFPP Update. Additionally, the 2017 CVFPP Update includes the following recommendation: “Provide the climate change hydrology and sea-level rise methodology used in the CVFPP to USACE for review. The</p>	No

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				State will share the results from the USACE’s review with researchers and others to provide for transparency of the CVFPP analysis.” This review will include San Joaquin BWFS climate change information.	
G_CCVFCA1-02	Melinda Terry	California Central Valley Flood Control Association	The draft feasibility study recognizes that reservoirs are important in managing floods in the Basin, however, they lack enough dedicated flood storage capacity to attenuate large floods. Furthermore, reservoir management actions will be necessary especially for the Calaveras River, Tuolumne and Merced River watersheds. The assessment of configuration SJ-C demonstrates that increases in flood storage can significantly reduce stages system wide and reduce stage increases from urban levee improvements. As such, to accomplish this, the proposed mechanisms for additional dedicated flood storage would be through conjunctive use and/or reservoir reoperation.	As identified by Section 1.2.1, both the Sacramento River and San Joaquin River Basin-Wide Feasibility Studies (BWFS) are Supporting Documents to the 2017 update of the CVFPP. These supporting documents helped to inform and guide the development of the Update. Future “project level” study is needed to implement specific projects identified in either of the BWFS.	No
G_CCVFCA1-03	Melinda Terry	California Central Valley Flood Control Association	The 2012 CVFPP SSIA identified the need to evaluate new reservoir storage and the Stakeholder Draft of the 2017 CVFPP update refined the SSIA portfolio for the San Joaquin River Basin includes a high priority action to evaluate the feasibility of increasing upstream flood storage in New Hogan Lake or elsewhere in the Calaveras River watershed. In addition to conjunctive use, increasing objective release and forecast operation studies, the Association supports further studies focusing on structural solutions that both accommodate increased flows and peak stages associated with climate change scenarios and expand water storage capacity for the San Joaquin River Basin. These studies would align well with the 2016 California Water Action plan as a viable structural solution to address water supply needs. This draft feasibility study does not identify specific progress made in such studies since 2012. Are there any other structural solutions to flood storage besides what is mentioned in the 2017 CVFPP update? For example, why isn’t Temperance Flat included in the evaluation? We would be interested in learning more as to how the Temperance Flat dam might reduce downstream flood damages and if there is the potential for it to act as a back-up for additional flood storage with Friant Dam at Millerton Lake.	Appendix 9 of the San Joaquin River Basin Wide Feasibility Study (BWFS) describes the more than 100 combinations of three reservoir management actions in the San Joaquin River watershed (objective release, additional flood storage space and FCO) that were evaluated in the BWFS that led to the components included in the SSIA. Although Temperance Flat was not looked at specifically, the potential benefits of additional flood storage within the Upper San Joaquin watershed were examined. Additionally, the effects of FCO on Friant Dam were studied. The options for the Upper San Joaquin River Basin included in the BWFS analysis were not included in the SSIA due to the fact that they only provided localized flood management benefits down to the Chowchilla Bifurcation Structure but demonstrated limited flood management benefits elsewhere.	No
G_CFB1-01	Justin Fredrickson	California Farm Bureau	<p>The California Farm Bureau Federation (“Farm Bureau”) is a non-governmental, nonprofit, voluntary membership California corporation whose 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 more than 48,000 agricultural, associate and collegiate 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.</p> <p>As the only previously unvetted component or companion document of major interest for the 2017 Update to the Central Valley Flood Protection Plan (“2017 Update” or “2017 Update Flood Plan”), these comments focus primarily on the recently released March 2017 Central Valley Flood Protection Plan Investment Strategy Technical Memorandum (“Investment Strategy”).</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_CFB1-02	Justin Fredrickson	California Farm Bureau	With respect to the Sacramento River Basinwide Feasibility Study and the 2017 Update itself, to the extent there has been little change in the Public Review Draft 2017 Flood Plan and there is therefore little change in our organizational perspective on these products at this time, Farm Bureau resubmits and incorporates herein the attached previously submitted comments on these topics.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_CFB1-03	Justin Fredrickson	California Farm Bureau	Farm Bureau also participated extensively and contributed to the final “Recommendations” coming out of the Stakeholder Advisory Committee process convened in 2016 on the Draft Conservation Strategy by the Central Valley Flood Protection Board (“Board” or “Flood Board”). Farm Bureau continues to work with a subgroup of the original Advisory Committee that is separately submitting comments on that effort and will be coordinating with others from the larger Advisory Committee to bring certain recommendations to the Board in the Board’s upcoming public workshops on the 2017 Update. Important areas of interest for Farm Bureau in relation to the Advisory Committee Recommendations include the Advisory Committee’s consensus view on the legal effect of the Conservation Strategy as a “nonregulatory planning document,” the need to avoid, minimize and mitigate significant adverse social, economic and environmental impacts on agricultural lands, and the need to preserve and incorporate agriculture as a wise use of the floodplain. Greater efficiency in permitting, accounting for hydraulic impacts, net conservation on regional-scale for multi-benefit projects versus routine O&M and sediment removal are also important issues for the Farm Bureau in relation to the Conservation Strategy.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_CFB1-05	Justin Fredrickson	California Farm Bureau	Farm Bureau offers no view on the San Joaquin River Basinwide Feasibility Study at this time—not because there are no relevant agricultural perspectives on this document, but due to time limitations and a lack of any full developed and duly informed input at this time.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_CFB1-06	Justin Fredrickson	California Farm Bureau	<p>A. New Funding Mechanisms</p> <p>Aside from the Basinwide Feasibility Studies and the Conservation Strategy, by far the newest and most significant new information in the 2017 Update is the 2017 Draft Investment Strategy—including, especially, the proposed new Sacramento-San Joaquin Drainage District, River Basin Assessment, and potential State Flood Insurance Program funding mechanisms. The following bullets offer a range of perspectives on these proposed new funding mechanisms specifically:</p>	Comments provided for each bullet in subsequent comment line items.	No

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G_CFB1-07	Justin Fredrickson	California Farm Bureau	As a threshold issue, all of these mechanisms are poorly developed, unvetted and rife with questions relating to basic fiscal, legal and political feasibility. To address these major uncertainties, Farm Bureau stresses the Investment Strategy’s commitment to convene working committees to closely involve affected stakeholders, including agricultural communities, in further exploration of these mechanisms. Maximum transparency and collaborative process will serve this purpose best and should include extensive outreach and support building for any subsequent legislation.	DWR and the CVFPB will work together with stakeholders, including the agricultural communities, to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be will be explored through a transparent and collaborative committee/workgroup process.	No
G_CFB1-08	Justin Fredrickson	California Farm Bureau	The Investment Strategy addresses the proposed mechanisms monolithically in an all-or-nothing manner that assumes the feasibility of all three, while failing to acknowledge important differences between one and another or accommodate alternative scenarios that include one, two as opposed to either all three of the options or none of them. The Drainage District concept, for example, while still far from settled or non-controversial, is at least better developed in concept and potentially more feasible than either the River Basin Assessment concept or the State Flood Insurance option. The River Basin Assessment concept is little more than a sketch at this point, potentially lacking in clear nexus and political feasibility, and certainly too amorphous to include as a foundational element of the State’s long-term Finance Plan at this time. Similarly, the State Flood Insurance concept suffers even more markedly from major uncertainties relating to actual feasibility, while carrying with it various risks, major trade-offs, and potential unintended consequences (including for example a loss of FEMA federal disaster assistance in the event of a major flood). While none of the three proposed mechanisms is a “sure thing” by any means, the River Basin Assessment and State Flood Insurance concepts are especially uncertain—and the proposed temporal lag in implementation of these concepts alone is insufficient to address these uncertainties where the mechanisms are already prematurely included as assumed elements of the proposed Finance Plan as a whole. This weakness results in a fairly fragile house of cards, the whole of which comes down if any one of the three fails to survive the necessary detailed vetting still to come.	Please reference Section 7 of the Draft CVFPP Investment Strategy, which considers 5 primary scenarios that vary funding contributions. These 5 primary scenarios considered a range of fund availability and addressed what management actions could be implemented under reduced funding. Some funding scenarios did not consider the use of new funding mechanisms and resulted in higher contribution levels from existing local mechanisms. The State has endeavored to outline the differences between each of the new potential funding mechanisms and the challenges of implementing each mechanism. These details can be found in Section 6 and Appendix C of the Draft CVFPP Investment Strategy. Estimated maximum best case revenue from these mechanisms is \$52M/year (7% contribution towards total 2017 refined SSIA portfolio). Without these new funding mechanisms, locals would need to contribute these funds with existing mechanisms.	No
G_CFB1-09	Justin Fredrickson	California Farm Bureau	With either the Drainage District concept or the River Basin Assessment concept, the Investment Strategy correctly notes that overlap with existing and future local assessments and the issue of redistribution from the state to the local and regional level are major concerns. Moreover, to the extent either mechanism could involve a parcel tax, we note that the State Responsibility Area fees that are the main precedent for such an approach are presently embroiled in litigation and the subject of considerable legal uncertainty and great political sensitivities. Any such mechanism would require a governance structure and decision-making structure with heavy local representation, clear mechanisms and guarantees for equitable redistribution to local and regional projects and priorities in addition to any system-level state priorities, as well as an ability-to-pay component for rural and agricultural areas and some type of offsetting or crediting mechanism to account for future and existing local assessments. Equity, accountability to taxpayers and property owners and some tangible, clearly quantified nexus to actual benefits are additional necessary components. Furthermore, in the case of any revamped Drainage District assessment concept, equity and revenue-generation characteristics would be significantly enhanced, while at the same time potential reducing the burden on those in the close physical proximity to State Plan of Flood Control facilities alone, through broader inclusion of upstream and urban areas benefitting from Drainage District services.	DWR and the CVFPB will work together with stakeholders, including the agricultural communities, to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to explore implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be explored through a transparent and collaborative committee/workgroup process.	No
G_CFB1-10	Justin Fredrickson	California Farm Bureau	Regarding the State Flood Insurance Program with excess premiums returning to fund risk reduction and flood protection, while at first blush, and particularly in light of some of the dysfunctions relating to the existing NFIP program, this concept might appear to have some appeal, treatment of agricultural structures is unclear and mandatory insurance “for all properties within any designated flood zone, including properties protected by flood management facilities (but which are still potentially subject to flood if that infrastructure fails),” along with the ambitious goal of at least a doubling of annual premiums, from \$60 million per year under the existing NFIP to a proposed \$120 million per year (or more) under the proposed State Flood Insurance Program, all sounds on balance highly unfavorable to agricultural landowners already struggling with rising premiums, insurance and inflexible building requirements under the NFIP. As noted in the Investment Strategy, there are also potential risks to implementation of a self-standing State Flood Insurance Program, including potential loss of federal disaster assistance, and perhaps a potential intensification of the already alarming trend of growing federal withdrawal and indifference to California flood protection programs and activities. In light of such considerations, certainly at least until the actual feasibility and convenience of such a program can be more thoroughly studied, a more prudent and logical near-term step would be to recommit and clearly articulate robust state support for ongoing efforts to secure potential administrative or legislative reforms of the NFIP, through either FEMA or the Congress.	The State is currently working with FEMA within the existing NFIP framework to evaluate and implement changes to improve NFIP. However, as we evaluate data regarding California’s participation in NFIP, we will explore the possibility of a State and/or regional flood insurance program to either augment or replace the NFIP.	No
G_CFB1-11	Justin Fredrickson	California Farm Bureau	B. Local Cost-Share Increases and New Funding Mechanisms The Investment Strategy raises serious questions as to the fairness and fiscal and economic feasibility of a dramatic jump in local cost shares (of 30 percent or more), while at the same time proposed to saddle local governments, special districts, and taxpayers with no less than three entirely new state funding mechanisms. Frankly, for rural and agricultural areas in particular, it is not clear what local management agencies and landowners stand to gain where most of these new revenue sources are proposed to fund system improvements, land acquisition and easement	The total CVFPP investment need increased from 2012 to 2017 was heavily influenced by the priorities recommended by the Regional Flood Management Planning program. Although the total CVFPP investment cost increased roughly 30% for locals, the local cost-share percentage remained at 8%, the same as in 2012. The 2017 refined SSIA portfolio includes significant expenditures for rural levees and infrastructure, as well as a significant increase in ongoing routine maintenance.	No

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			activities that the majority landowners in these areas oppose, without any commensurate increase in improvement of rural levees or on-going O&M. Another shortcoming here relates to the lack of any distinction between rural areas versus urban areas and small communities in the discussion of local cost shares and proposed new state funding mechanisms. While urban areas have a much larger tax base and many more options to fund and implement necessary flood infrastructure improvements, rural and agricultural districts are much more limited in their options. This while at the same time the State’s Flood Plan commits minimal investments to these same rural and agricultural areas, while also making such areas the system’s safety value, as well as the target of all of the Flood Plans proposed new flood bypass, setback, and habitat features. From this perspective, to achieve some semblance of fairness, ability to pay, broader public investment, and some fundamental differentiation between rural versus urban and small community districts is absolutely necessary. For support of any such concept, the rural and agricultural counties and basins would certainly need to see much more demonstrated benefit and a much greater emphasis on their own regional priorities.		
G_CFB1-12	Justin Fredrickson	California Farm Bureau	C. Federal Funding Federal funding will clearly remain an indispensable component of any long-term investment strategy and, while federal budgeting process, congressional politics, national priorities, and recent investment trends and requirements have been disheartening, California truly has no option here but to work harder to capture these badly needed federal monies. A regularly updated Flood Plan, a comprehensive Investment Strategy, and a Five Year Infrastructure Plan all help to accomplish this goal by tracking progress, quantifying needs, charting a clear course, building greater buy-in and efficiency within California, and thus making the case for continued federal investment overall. Beyond this, educating federal agencies and the Congress on unique challenges faced in California, steady progress and continuous planning to align with federal processes, political cycles, and congressional appropriations are all key.	The CVFPP recommends maximizing federal interest and participation in Central Valley flood management. The CVFPP includes coordination with federal agencies as one of its top 8 policy issues. The State is currently working with the federal government with regards to Water Resources Development Act (WRDA), joint USACE planning efforts, watershed and multi-benefit approach, Central Valley project advocacy, reconciling of USACE project credits, and residual risk USACE activities.	No
G_CFB1-13	Justin Fredrickson	California Farm Bureau	D. Scenarios As noted, the failure to consider scenarios and contingencies that do not assume implementation of all three new funding mechanisms results in a fragile and possibly short-lived long-term finance plan if any of these mechanisms later prove infeasible. In contrast, Farm Bureau commends the prudent decision to defer and decouple costly, controversial, and potentially unnecessary the 2017 Update’s proposed Feather River and Sutter Bypass modifications in most of the Investment Strategy’s scenarios. Not only are these modifications harmful to local agricultural and the regional economy, extremely controversial, and potentially unnecessary at least until potential alternatives are further explored and exhausted but, as shown on page 7-35 of Investment Strategy, the cost savings to State of California and the federal government from an exclusion of the proposed Feather River/Sutter Bypass elements of the SSIA are substantial.	Please refer to Scenario 3C in Section 7 of the Draft CVFPP Investment Strategy.	No
G_CFB1-14	Justin Fredrickson	California Farm Bureau	E. 218 Reform The Investment Strategy recounts the history of California’s multi-decadal and still raging “taxpayer revolt,” beginning with enactment by popular ballot of Proposition 13, followed by Proposition 218, Proposition 26, and so on—however, after reviewing this history, the Investment Strategy seems not to heed its lesson with the final recommendation to explore legislative means to relax and circumvent Proposition 218. Propositions 13, 218, and 26 were all enacted as a reaction to past abuses in the area of excessive taxes, assessments, and fees. Their common purpose is to hold government agencies accountable and protect California tax and ratepayers by ensuring strict linkage of such charges to the actual benefits for which are levied, assessed, or collected. While admittedly, this makes it considerably harder to impose new fees and taxes, attempting to circumvent such controls will only ensure a prolongation and potential exacerbation of California’s continuing taxpayer revolt at the ballot box. Instead, we submit that the better way to address this problem is to take greater care to devise fair taxes and fees that can demonstrate clear value and benefit through means such as the protections and requirements mentioned in Section A above, relating to the Investment Strategy’s proposed new state funding mechanisms (e.g., local input and governance, return-to-source funding guarantees, clear linkage of benefits, etc).	Comment noted – The County Engineers Association of California (CEAC) letter dated August 17, 2016, acknowledges the previous failed attempts to establish reliable funding for stormwater and flood protection services and projects. However, CEAC continues to believe that “funding for stormwater and flood control is critical to the health and safety of our communities and recommends that CEAC stay actively engaged in this issue and continue to participate in the development of long term statewide solutions.” CEAC continues to advocate for stormwater and flood protection services to be considered utilities that qualify for the same exemptions to Proposition 218 voting requirements, as water and wastewater services do. DWR concurs with CEAC’s assessment of necessary policy changes regarding Proposition 218’s requirements on stormwater and flood protection assessments.	No
G_CFB1-15	Justin Fredrickson	California Farm Bureau	F. State Maintenance Areas The proposed use of the State’s existing State Maintenance Area authorities as leverage to force local acceptance of the Investment Strategy’s proposed new funding mechanisms is, in our judgment, generally unwarrantedly and unnecessarily inflammatory. It is also ironic to propose such an approach in an Investment Strategy to finance flood management, where it is well known that existing State Maintenance Areas operate very inefficiently, at greater cost to the affected landowners, while at the same doing a poorer job on maintenance than their local counterparts. (For example, in the Cherokee Canal area, current controversial proposals in the Flood Plan are in part symptomatic of major problems caused by a lack of ongoing maintenance by an existing State Maintenance Area.) Beyond this, if the State were ever to seriously attempt to leverage this authority to obtain the proposed new assessments, it would certainly need to make a strong showing that any affected local management agencies were	The State has and will continue to adhere to California Water Code Section 12878 for guidance on the use, necessity and establishment of State flood management maintenance areas.	No

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			in fact deficient in their duties and that the use of the State Maintenance Area authority is not merely a vehicle to impose the proposed new fees.		
G_CFB1-16	Justin Fredrickson	California Farm Bureau	<p>G. Flood/Water/Eco Linkages</p> <p>It is possibly an unfortunate oversight that the Investment Strategy has decided to exclude from its analysis the possibility of a potential future “water surcharge” with a potential flood component from its analysis, while it at the same time proposing a highly uncertain and potentially competing River Basin Assessment mechanism to replace the State’s currently integrated regional water management planning approach. In fact, even as the Investment Strategy laments the lack of holistic consideration of broad public benefits, while struggling to identify such broad public benefits in the Flood Plan, the same Investment Strategy potentially misses the opportunity to establish a closer linking of the State’s flood objectives to the broader context of on-going water and environmental challenges elsewhere throughout the state. In fact, to effectively capture greater public contribution to Flood Plan’s cause, it may well be necessary to generate greater assurances, incentives, and a perception of broader public value by more closely integrating overlapping objectives from the State’s water and ecosystem efforts as these efforts have traditionally existed in the separate water management, water quality, habitat, and species management processes. In particular, future GO Bonds that combine both flood, water, and eco purposes would have a much greater chance to succeeding when compared to any single-purpose flood bond. Furthermore, demonstrating the ecological importance of functional floodplain habitat for several listed species and establishing clear incentives and the possibility of increased water supply reliability and potential associated regulatory assurances of relief for water users throughout the state could very powerfully motivate higher levels of public investment in Central Valley flood infrastructure.</p>	While funds from a water surcharge were not included in the scenario analysis, a discussion of applicability of the water surcharge is included in Section 6 of the Draft CVFPP Investment Strategy.	No
G_CFB1-17	Justin Fredrickson	California Farm Bureau	<p>H. Delta Levees</p> <p>It is unfortunate and illogical that the Flood Plan’s Investment Strategy does not lay out more of an explicit plan for coordination of parallel processes (currently residing with the Delta Stewardship Council and the Delta Protection Commission and the Flood Board in a related consultative role) to achieve a holistic financing framework for both project and non-projects, both within the Sacramento-San Joaquin River Delta and elsewhere in the Central Valley region as a whole. Project and non-project levees, whether within or outside of the Delta are ultimately all part of the same system and state funding problem requiring a common solution. The 2017 Update and Investment Strategy should include a strategy for express coordination of these parallel flood management financing challenges both within the Sacramento-San Joaquin River Delta and the larger Central Valley region.</p>	Coordination between DWR, the Delta Stewardship Council, and the Delta Protection Commission will continue through future 5-year updates of the CVFPP.	No
G_CFB1-18	Justin Fredrickson	California Farm Bureau	<p>I. Easements/Land Acquisition</p> <p>The need for large and highly controversial expenditures on proposed easements and land acquisitions can likely be avoided, and long-term Flood Plan costs reduced overall, through natural restrictions on future growth resulting in exchange for proposed reforms leading to greater flexibility for agricultural structures under the NFIP. Beyond this, Farm Bureau is very concerned about the significant land management restrictions that would likely go with additional conservation and flowage easements—all of which could run contrary to the State’s stated commitment maintain and support long-term viability of agriculture within and adjacent to the State Plan of Flood Control system.</p>	DWR and the CVFPB will work together with stakeholders, including the agricultural communities, to further develop and evaluate floodplain management issues. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. Land use and floodplain management is one of the 8 top policy issues to be addressed through a transparent and collaborative effort.	No
G_CFB1-19	Justin Fredrickson	California Farm Bureau	<p>J. Private-Public Partnerships</p> <p>Farm Bureau appreciates the Investment Strategy’s acknowledgment of the potential for new or expanded private-public partnerships as a potential means to more cost-effectively and efficiently achieve some Flood Plan objectives. On the habitat mitigation and permitting side, examples include the existing Central Valley Salmon Recovery Plan effort being led by the Northern California Water Agencies and others in cooperation with NOAA Fisheries, the California Department of Fish and Game and various environmental NGOs, a new Central Valley Habitat Exchange project, and a proposed new Central Valley Salmon Partnership that would emulate for anadromous fish species the structure of the highly successful Central Valley Joint Venture for water fowl. At the same time, while same collaborative, market-based approach could hold considerable promise, there is also practical need for some form of permanent mitigation credit toward on-going O&M activities in exchange for net conservation.</p>	The State will consider exploring Private-Public Partnerships where appropriate and feasible.	No
G_CFB1-20	Justin Fredrickson	California Farm Bureau	<p>Conclusion: In closing, Farm Bureau thanks the Board and Department for the opportunity to comment on the Draft 2017 Update to the Central Valley Flood Protection Plan and its accompanying documents including the Draft Supplemental PEIR, the Basin Feasibility Studies, the Draft Conservation Strategy, and the new Draft Investment Strategy.</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_CWR1-01	Deirdre Des Jardins	California Water Research	<p>1. Measures of Progress</p> <p>The 2017 Central Valley Flood Protection Plan Update’s measure of progress for urban levees was in miles of urban levees that have been improved. A more appropriate metric is reduction in people at risk and expected economic damages in a 200 year or 500 year flood in the Central Valley. This approach was discussed in a 2007 report by a panel of independent experts, titled, A California Challenge – Flooding in the Central Valley, A Report from an Independent Review Panel to the Department of Water Resources, State of California. Recommendations of the panel included the following (p. 9-10):</p>	Flood damage reduction and life loss analysis were conducted as part of the 2017 CVFPP Update. The Stockton metropolitan area was included in both of these analyses. The methodology and results of the flood risk analysis is described in Section 3.7 Flood Risk Analysis in the Scenario Technical Analyses Summary Report. A summary of the life loss results are shown on Page 3-35 of the 2017 CVFPP Update. As noted in the 3rd bullet of Section 4.5.1, “Recommendations for Land Use and Floodplain Management”, the recommendations identified in the 2007 report from the California Floodplain Management Task Force, have been considered in the development of the CVFPP. As recommended in Section 4, DWR will continue to work in collaboration with other Federal, State, and Local	No

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			<p>- Provide the highest level of risk reduction feasible to existing urban areas where thousands of people are at unacceptably high risk. The Panel believes that this level of protection should be equivalent to protection against the Standard Project Flood, which represents a flood that can be expected from the most severe combination of meteorologic and hydrologic conditions that are considered reasonably characteristic of the region. Providing this level of protection does not, by itself, prevent the failure of the system or of individual levees; nor does it guarantee that the Standard Project Flood cannot be exceeded in rare circumstances. One hundred year protection is not an acceptable level of protection for urban areas.</p> <p>- Develop an implementation plan for providing this reasonably high level of protection for all urban areas. The needed level of flood protection should be phased in with at least a200-year level of flood protection to be achieved by 2020, and Standard Project Flood protection by 2030. Priority should be given to urban areas in deep floodplains.</p> <p>- Ensure that any flood protection provided is sustainable fiscally and physically over time.</p> <p>As will be discussed in section 3 of these comments, “Increasing Frequency of Extreme Events,” climate change makes the recommendation to upgrade to high levels of protection for all urban areas essential.</p> <p>The 2007 Independent Review Panel report included the following table with expected damages in a 200 year flood (p. 19): [see G_CWR1.pdf for table]</p> <p>The 200 year flood damages table did not include estimated damages for the City of Stockton, because the Department of Water Resources 2002 Sacramento and San Joaquin River Basins Comprehensive Study, on which the table was based, did not include the central Delta region where Stockton is located. The panel could not locate comparable damage estimates and number of parcels damaged for 200- and 500-year events for Stockton from other sources.</p> <p>However, the Army Corps of Engineers Interim Lower San Joaquin River Feasibility Study estimated \$21 billion in damageable property in the 500 year flood zone. Thus damages in a 200 year flood would likely be similar in magnitude to Sacramento, on the order of \$10 billion. From the 200 year flood damages table, one can see that the largest reduction in risk to people and property is through protecting the urban areas. The 2012 Central Valley Flood Protection Plan did include estimates of Expected Annual Damages, but there was no discussion of reduction in Expected Annual Damages in the 2017 Update. This is a major omission.</p>	<p>stakeholders on refining the metrics to track as well as how these metrics will be tracked. This information will be refined as part of the 2022 CVFPP Update.</p>	
G_CWR1-02	Deirdre Des Jardins	California Water Research	<p>The Department of Water Resources did spend \$80 million on extensive evaluations of urban levees in Sacramento, West Sacramento, Stockton, and Manteca.2 While the Sacramento and West Sacramento levees were declared eligible for the Prop 1E Early Implementation Program, it was apparently decided that the Stockton area flood control agency (SJAFCA) and other Delta flood control agencies would have to demonstrate that non-project urban levees could be “likely to be added to the State Plan of Flood Control” to be eligible for the EIP. This was referenced in DWR’s 2010 Early Implementation Program Guidelines:</p> <p>2. Projects in the Delta</p> <p>The EIP program is specifically intended to award Proposition 1E funds for projects that are or will be in the State Plan of Flood Control, which includes projects in the Sacramento River and San Joaquin River Watersheds. Propositions 1E and 84 provide funds for the Delta Levees Program which are awarded through different programs. Some projects in the Delta may be eligible for one or the other or both programs as follows: [...]</p> <p>Projects in the Secondary Zone of the Delta</p> <p>[...] •Improvements to Urban non-project levees in the secondary zone may be funded through the Delta Levees Program or, if the levee is likely to be added to the State Plan of Flood Control, through EIP.</p> <p>[...] Local Agencies are free to choose whether to seek funding through the Delta Levees Program or EIP program. (p. 20)</p> <p>This appears to have been a catch-22 for the local agencies, since any plan for upgrading to 200 year levels of protection required improving all levees, not just SPFC levees, The result of the lack of EIP funding for the Stockton/Lathrop metropolitan region has been that almost the entire \$3 billion in Proposition 1E funding for flood control has been allocated, but the economic risk of a 200 year flood in the Central Valley has been reduced by only about half. The 13th largest city in California is also not sufficiently protected. While the 2017 Update commendably proposes an increase in funding for rural flood protection, it is important that this funding not be obtained by re-allocation of funding for urban flood protection.</p>	<p>The 2017 CVFPP states that the areas with the highest levels of risk to lives and assets concentrated in densely populated areas should be prioritized for near-term implementation. Available state funding for urban improvements is not being reallocated to rural-agricultural areas. Urban levee improvements in the Stockton metropolitan area were included in the 2012 CVFPP State Systemwide Investment Approach and also included in the 2017 CVFPP Update. As noted in the comment letter, the U.S. Army Corps of Engineers has been conducting the Lower San Joaquin River Feasibility Study in partnership with SJAFCA and the Central Valley Flood Protection Board to identify potential federal interest in the Lower San Joaquin River region. In parallel to development of the USACE’s LSJRFS, DWR has helped fund Smith Canal and RD 17 100-year seepage project (etc. coordinate with Flood Projects office).</p>	No
G_CWR1-03	Deirdre Des Jardins	California Water Research	<p>Although receiving a minimum of state investment, the Stockton area flood control agencies have made commendable progress on plans to upgrade levees to a 200 year level of protection, especially considering that the city was one of the hardest hit by the Great Recession and subsequent foreclosure crisis, and only recently emerged from bankruptcy.</p> <p>The Stockton Area Flood Control Agency worked with the Army Corps of Engineers on a plan to upgrade the levees to a 200 year level of protection. The Army Corps released the Draft Interim Feasibility Study and Environmental Impact Statement / Environmental Impact Report in February 2015 for the Lower San Joaquin. In the feasibility</p>	<p>The State has prioritized urban improvements in the 2012 CVFPP, 2017 CVFPP Update, and through DWR funding programs. A large majority of the Prop 1E funds was used for urban levee improvements that would achieve an urban level of protection. It is not always assumed that local agencies have sufficient funding to achieve 200-year level of protection, which is why Stockton urban improvements are included in the CVFPP with-project condition.</p>	No

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			<p>study, the Army Corps of Engineers noted that 264,000 people live in floodplains in the Stockton area, with \$21 billion in damageable property and 23 critical structures: “The existing levee system within the study area protects over 71,000 acres of mixed-use land with a current population estimated at 264,000 residents and an estimated \$21 billion in damageable property. In addition to the residents and property, the levee system protects approximately 23 structures considered to be critical infrastructure (hospitals, police and fire stations, etc.) as well as the Interstate 5 and State Highway 99 corridors.” and concluded that “There is significant risk to public health, safety, and property in the project area associated with flooding.” (p. 90)</p> <p>The Army Corps of Engineers Interim Feasibility Study and Draft EIR/EIS explains the problems with seepage in the Stockton levees:</p> <p>“The potential for seepage problems to occur along the existing levees in the project area is created by discontinuous layers of coarse-grained pervious soils (i.e., sands and gravels). These are found at varying depths of up to 100 feet. During high-water events, water from the river can enter the pervious soil layers and then move laterally through these layers under/through the levee. Excessive seepage can erode soil within the levee and lead to a rapid collapse and subsequent breach. Historically, foundation conditions were evaluated assuming homogeneous materials, but the floods of 1986 and 1997 and the resulting levee failures throughout the Central Valley resulted in a revision of the criteria for the evaluation of under-seepage. The risk of levee failure is not due to design deficiency or to lack of O&M of the existing levees, but to a better understanding of the mechanics of under-seepage in the Central Valley. The project levees within the study area do not meet current USACE levee design criteria and are at risk of breach failure at stages considerably less than levee crest elevations. This is evidenced by historical levee boils and heavy seepage at river stages less than design flows.” (p. 90, emphasis added.)</p> <p>Similar seepage problems were seen in West Sacramento levees. The Army Corps of Engineers estimated that the “risk and uncertainty” of levee failure was as high as 50% a year for some of the levees protecting the northern part of the city. This is unacceptable after Hurricane Katrina. It should be clearly stated in the plan that it is the highest priority of the Central Valley Flood Protection Board and the Department of Water Resources that urban areas within the Central Valley reach 200 year levels of protection. It should not be assumed, simply because SB 5 requires it, that local agencies have sufficient funding to accomplish the task.</p> <p>[See G_CWR1.pdf for photograph of Stockton flooding in 1955]</p> <p>[See G_CWR1.pdf for graphic titled “Figure 5-2. R&U Composite Floodplain, Alternative-1 No Action Plan.5-29]</p>		
G_CWR1-04	Deirdre Des Jardins	California Water Research	<p>2.Sea Level Rise</p> <p>The climate change analysis for the Central Valley Flood Protection Plan has some significant flaws, which need to be remedied for adequate consideration of climate change impacts in flood planning. The first flaw is that the analysis does not consider higher sea level rise scenarios. Flood control projects manage catastrophic risks. It is essential to consider worst case scenarios, particular for high density urban areas where flooding could result in loss of life and major economic damages. Therefore using a mean projection of sea level rise for flood control planning for urban areas is inappropriate.</p>	<p>The CVFPP planning horizon is 30 years for investment planning purposes, and builds upon the directives and guidance of AB 2800, Executive Order B 30-15, Executive Order S-13-08, Public Resources Code 71155, and the California Natural Resources Agency publication, “Safeguarding California: Reducing Climate Risk (2014)”. The physical elements proposed in the BWFSs and the CVFPP are assessed over a longer horizon (50 years). This allows for an understanding the flood risk change and an assessment of the resiliency of elements over time. For these reasons, the modeling and technical analyses presented in this document assess the performance of the system in terms of flood risk over a 50-year period, to 2067. The CVFPP is updated with each 5-year cycle. The 5-year cycle of CVFPP updates means that the impacts can be reassessed over the 30-year investment and implementation of the SSIA. DWR used NRC’s projections for San Francisco to interpolate a year 2062 projection of 1.27 feet as the projected SLR for use in the 2017 CVFPP Update (2062 was used for BWFS analysis and was considered close enough to 2067 to use for the 2017 CVFPP update). Comparing the sea level rise used in the CVFPP 2017 with the latest California Ocean Protection Council (OPC) study called: Rising Seas in California: An Update on Sea Level Rise Science (April 2017), the 1.27ft of sea level rise falls above the 2050 projection “likely range” (67% probability SLR is between 0.6 and 1.1ft). And the 1.27ft of sea level rise falls in the likely range of the 2100 projection too (2100 RCP 4.5: 67% probability SLR is between 1.2 and 2.7ft). Therefore, sea-level rise projections used in the 2017 CVFPP is an upper-end estimate, especially over a 30-year planning horizon.</p>	No
G_CWR1-05	Deirdre Des Jardins	California Water Research	<p>Consideration of potential impacts from higher levels of sea level rise is also appropriate and necessary, given the recent dramatic warming of the arctic and acceleration of melting of polar ice sheets. Recent satellite observations show that the rate of melting in the ice sheets in West Antarctica and Greenland is increasing exponentially. In December 2014, the American Geophysical Union accepted a paper by Tyler Sutterly and colleagues at University of California, Irvine and NASA’s Jet Propulsion Laboratory which examined satellite data estimating the annual mass loss in the Amundsen Sea Embayment. Sutterly’s study showed that the acceleration of mass loss (net melting) had tripled in the last decade. Sutterley’s analysis was comprehensive and authoritative as it evaluated and reconciled data using four different measurement techniques over 21 years. Similar accelerations are being seen in Greenland and the Arctic. The graph and map on the following page show Arctic sea ice and temperature anomalies.</p> <p>[See G_CWR1.pdf for graph titled “Arctic Sea Ice Extent (Area of ocean with at least 15% sea ice)]</p> <p>[See G_CWR1.pdf for graphic titled “GFS 2m T Anomaly (degrees Celsius)[1979-200 base]</p>	<p>Please see response to Comment G_CWR1-04.</p>	No

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G_CWR1-06	Deirdre Des Jardins	California Water Research	<p>The 2012 Central Valley Flood Protection Plan stated that an “initial, surrogate condition” was used for looking at potential flooding in the Sacramento Delta:</p> <p>“For the 2012 CVFPP, high tide conditions during the 1997 flood were used as the boundary conditions for hydraulic analysis and could be considered an initial, surrogate condition under climate change. This tide was about two feet higher than would normally be expected on the basis of solar and lunar gravitational forces that create tides. DWR will continue to coordinate with other DWR programs, Delta Stewardship Council’s Delta Plan, and ongoing USACE feasibility studies to collectively address how sea level rise could contribute to potential estuary flooding in the Delta.”</p> <p>The 2017 Central Valley Flood Protection Plan Update indicates that mean estimates from the National Research Council’s 2012 report are being used. While the NRC mean estimates may be acceptable for rural areas with low numbers of residents, they are inappropriate for the city of Stockton, which has an estimated \$21 billion in damageable property and 264,000 people behind levees.</p>	<p>Please see response to Comment G_CWR1-04.</p>	No
G_CWR1-07	Deirdre Des Jardins	California Water Research	<p>The USACE has had updated sea level rise projections available for years, as well as an online calculator which gives projections by both ACOE and NOAA for low, intermediate and high scenarios. The projections are available for gauges along the entire length of the east and west coasts of the United States. 5 Port Chicago is the closest gauge in the calculator to the Sacramento Delta. The table below shows regionally corrected sea level rise values from 2030 to 2100. The regionally corrected estimates for Port Chicago show that USACE’s high estimate of sea level rise is 0.9 feet by 2030, 1.8 feet by 2050, and 5.3 feet by 2100. This is significantly higher than the NRC mean estimates. NRC’s high sea level rise estimate is even higher.</p> <p>[See G_CWR1.pdf for table and graphic titled “Relative Sea Level Change Projections - Gauge: 9415144, Port Chicago, CA (05/01/2014)]</p> <p>Failing to consider higher sea level rise scenarios could result in tens or hundreds of millions in investments in levees that will be inadequate by the latter half of the century. This risk is not adequately addressed or analyzed in the Central Valley Flood Protection Plan or the Draft EIR/EIS.</p>	<p>Please see response to Comment G_CWR1-04.</p>	No
G_CWR1-08	Deirdre Des Jardins	California Water Research	<p>3.Increasing Frequency of Extreme Events</p> <p>The 2017 CVFPP Update climate change analysis also does not consider the possibility of increased frequencies of extreme events, which is likely under the highest greenhouse gas emissions scenarios. A recent study by Jin Ho Yoon, S.-Y. Simon Wang, et. al., at the University of Utah using CMIP5 models⁶ found that both extremely dry periods and extreme flooding increase by 50% toward the end of the 21st century. Yoon et. al. defined extreme events as at the 2nd percentile. Such an increase in extremely wet events could increase the frequency of 200 year and 500 year flood events. Given recent experiences with both the driest January on record in some locations in 2014, and the wettest January on record in some locations in 2017, these projections should be carefully considered.</p> <p>[See G_CWR1.pdf for graphic titled “Running Variance of Annual Precipitation” and “Running Variance of Top-1m soil moisture”]</p>	<p>A detailed account of the climate change analyses and summary of the findings is presented in the supporting document “2017 CVFPP Update – Climate Change Analysis Technical Memorandum”. Specifically concerning this aspect, the findings of the analyses are that:</p> <ul style="list-style-type: none">■ Extreme precipitation, the driver for most flood events, is likely to intensify, even with projections of overall drier conditions.■ Changes in flood magnitudes and frequencies at the basin-wide scale vary spatially so that the Sacramento and San Joaquin basins respond differently. Watershed characteristics strongly influence the hydrological response to climate change, with the high elevation San Joaquin watersheds showing the largest percentage increases in flood volumes due to a reduction in precipitation falling as snow (instead falling as rain) and the more rapid melt of snow packs. <p>The 5-year cycle of CVFPP updates means that the impacts can be reassessed over the 30-year investment and implementation of the SSIA. Additionally, the recommendations of the climate change study undertaken to support the 2017 CVFPP Update recommends:</p> <ul style="list-style-type: none">■ Addressing uncertainty by evaluating a broader set of future climate scenarios, or sensitivity analyses.■ Incorporating new findings from research into atmospheric rivers, watershed controls on precipitation, and runoff processes (including research at Scripps Institution of Oceanography and at UC Davis).	No
G_FOR1-01	Ronald Stork	Friends of the River	<p>(1) CONSERVATION STRATEGY</p> <p>The Board should adopt the Conservation Strategy as a part of the 2017 Update.</p>	<p>The supporting documents that the Board chooses to adopt as part of the 2017 CVFPP Update is ultimately at the discretion of the Board.</p>	No
G_FOR1-02	Ronald Stork	Friends of the River	<p>(2) VEGETATION ON LEVEES</p> <p>In the 2012 flood plan resolution, the Board raised concerns about the Corps of Engineers’ proposal to eliminate vegetation, other than annual grasses, on or near levees. It also modified DWR’s proposed vegetation policy and called for additional study and potential refinements of the state’s policies on this matter.</p> <p>DWR and the Board assisted Representative Matsui and Senator Boxer to insert language into the 2014 WRDA to require the USACE to reconsider its proposal. The USACE has yet to put forth a new vegetation proposal.</p> <p>DWR has included a “when it dies, don’t replace it” vegetation-on-levees proposal in the Conservation Strategy appendix. It also appears to have incorporated its 2012 Flood Plan vegetation-on-or-near-levees proposal into its Urban Levee Design Criteria (ULDC).</p> <p>The state has already lost 95% of the riparian vegetation in the Central Valley. Much of what is left is on or near the levees or within the flood system.</p>	<p>The DWR levee vegetation management strategy (VMS) described in the Conservation Strategy is life cycle management, consistent with the 2012 CVFPP. As described in Appendix D, Section 2.2.3, “limited natural recruitment” is a concept that was articulated in Appendix D for consideration by DWR Flood Managers and resources agencies, but has not been fully developed or agreed to. DWR would mitigate for loss of vegetation and habitat to the extent required by law.</p> <p>The comment contains several incorrect factual assertions and assumptions, and legal conclusions drawn from those incorrect facts.</p> <p>Rather than relying on the Conservation Strategy, mitigation for the VMS was established in the 2012 CVFPP PEIR, specifically in mitigation measures BIO-A-2b (NTMA) and BIO-T-7b. Those measures are unchanged in the 2017 CVFPP SPEIR. With regard to the Conservation Strategy, Mitigation measure BIO-A-2b acknowledges that one of a variety of mechanisms for achieving the mitigation required by the measure could be implementation of the Conservation Strategy, but the mitigation required by the measure is not reliant on that mechanism being used.</p>	No

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			<p>The Board should consider doing the following:</p> <p>a. Don’t adopt the “when it dies, don’t replace it” policy in the Conservation Strategy until after the USACE releases its new vegetation plan and after DWR, the Board, and other state agencies have the opportunity to engage with the USACE.</p> <p>b. Require that DWR include a mitigation plan for the loss of vegetation and habitats.</p> <p>c. Undertake a consistency review of the 2012 CVFPP Board resolution and the policies being proposed in the 2017 proposed DWR CVFPP update.</p>	<p>The Conservation Strategy is also intended to provide net environmental benefits independent of the need to compensate for the impacts of CVFPP actions, including the VMS.</p> <p>The comment also assumes that the vegetation management strategy is just now being “proposed.” To the contrary, the vegetation management strategy was adopted as an interim strategy as part of the 2012 CVFPP, and at this juncture, only refinements to the existing VMS are being proposed. Appendix D of the Conservation Strategy describes these refinements and includes the concept of “limited natural recruitment” which may be further explored in the future in conjunction with stakeholders, but would not be implemented at this time.</p> <p>The comment recites some of the history of the development of the VMS, which was in part a response to previous Corps policy generally requiring the removal of all vegetation from all levees. DWR strongly disagreed with the Corps’ extreme stance, and crafted the VMS as an approach – reflecting scientific research and risk prioritization – that balances flood risk reduction system effectiveness with habitat values. DWR and the CVFPB continue to believe that the approach reflected in the VMS best accomplishes this balance. The fact that the 2014 WRRDA requires the Corps to reconsider its current policy does not alter this conclusion. From a CEQA perspective, the 2014 WRRDA does not reflect a material change in circumstances.</p> <p>The 2017 SPEIR has now quantified both the long-term loss of vegetation anticipated to result from the VMS (1300 acres) as well as the anticipated benefit from replacement activities (3500 acres). This supports the conclusion of the 2012 CVFPP PEIR that adequate feasible mitigation is available. Finally, as in 2012 with regard to the former Conservation Framework, the Conservation Strategy is an integral part of the CVFPP. The additional detail of the Conservation Strategy as compared to the Conservation Framework will help ensure its effectiveness.</p> <p>In addition to being supported in the current circumstance, since the 2012 CVFPP PEIR was unchallenged, it is now conclusively presumed adequate in the absence of material project changes, changed circumstances or significant new information, none of which have occurred.</p> <p>Regarding consistency with the 2012 CVFPP Board resolution, please see the CVFPB workshop materials from the 6/10/17 workshop, which largely address this comment. Regarding the ULDC, the document is consistent with and reiterates the VMS contained in the 2012 CVFPP, as it would apply to urban levees.</p>	
G_FOR1-03	Ronald Stork	Friends of the River	<p>(3) LEVEE OPERATIONS AND MAINTENANCE</p> <p>DWR and the Board need to take steps to get levee O&M into conformance with USACE standards, other than vegetation, or decide or affirmatively accept that certain levees should leave the program. Out of 1,600 miles of project levees, 926 miles are not in compliance with USACE standards. Non-conforming O&M has three impacts: (1) it can sometimes threaten public safety, (2) it makes these levees ineligible for PL84-99 repair of flood damages by the USACE at federal expense, and (3) unless handled well, it increases state and local liability.</p>	<p>Issues surrounding this topic are addressed in the supporting document to the 2017 CVFPP Updated entitled “Draft Flood System Long-Term Operation, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R) Cost Evaluation Technical Memorandum and Appendixes.</p>	No
G_FOR1-04	Ronald Stork	Friends of the River	<p>(4) CLIMATE CHANGE IN THE SAN JOAQUIN RIVER BASIN</p> <p>DWR has estimated that climate change will increase unimpaired flows in the main San Joaquin tributaries by up to 70–80 percent. This increase in flows will overwhelm the flood management system in the valley — for both rural areas and some urban areas. A comprehensive assessment and approach is needed and should be included in the next update.</p> <p>The emphasis in the San Joaquin Basin will necessarily differ from what can be achieved in the Sacramento Valley. By way of explanation, DWR’s Independent Review Panel on Flooding in the Central Valley attempted to characterize the contrasts of the San Joaquin Basin with the generally more capable Sacramento Basin floodwater management arrangements:</p> <p>The San Joaquin Valley is also rimmed with dams, but floodway capacities in this system are small and designed for managing snow-melt flooding. Unregulated rain-flood flows from many dams are quite foreseeable (and occurred in 1997), in part because major reservoir-flood-space encroachments can occur from storms that may have happened days, weeks, or even months earlier.</p> <p>There are no meaningful opportunities for new dams with flood reservations in this basin (and none are currently proposed). The panel noted that circumstance. Risk management approaches in the San Joaquin basin are largely the official recognition of floodplain flooding and some relatively minor levee improvements and setbacks.</p> <p>But these are, nevertheless, critical goals to be accomplished. And, as in the next subject, there are important interactions between the institutional arrangements under the jurisdiction or potential jurisdiction of the board and better reservoir management that can affect risk reduction in this basin.</p>	<p>Climate change is expected to have more significant impacts in the San Joaquin Basin than the Sacramento River Basin. Given the large differences between the Sacramento and San Joaquin River Basins, a different portfolio of management actions are proposed in each basin. The San Joaquin Basin SSIA portfolio emphasizes a wide range of actions including reservoir management, levee improvements, setback levees, transitory storage, bypasses and other actions.</p> <p>The 5-year cycle of CVFPP updates means that climate change impacts can be reassessed over the 30-year investment and implementation of the SSIA.</p> <p>Additionally, the recommendations of the climate change study undertaken to support the 2017 CVFPP Update recommends:</p> <ul style="list-style-type: none">■ Addressing uncertainty by evaluating a broader set of future climate scenarios, or sensitivity analyses.■ Additional study to gain insight about reservoir climate vulnerability and potential adaptation needs.■ Incorporating new findings from research into atmospheric rivers, watershed controls on precipitation, and runoff processes. (including research at Scripps Institution of Oceanography and at UC Davis).	No
G_FOR1-05	Ronald Stork	Friends of the River	<p>(5) SAN JOAQUIN RESERVOIRS: FLOOD SPACE AND DESIGNATED FLOODWAYS</p> <p>I’ll use Don Pedro Dam as an example, but this applies to New Exchequer and Friant as well, although the latter dam is designed to be overtopped.</p> <p>Don Pedro has 340,000 AF of flood storage and was modeled to be able to successfully regulate 64% of the magnitude of the then estimated standard project flood (probability performance metrics were not the basis of reservoir-design-floods of dams of this era). As is typical with basin dams, the dam, unless drawn down well below</p>	<p>Appendix 9 of the San Joaquin River Basin Wide Feasibility Study (BWFS) describes the more than 100 combinations of three reservoir management actions in the San Joaquin River watershed (objective release, additional flood storage space and FCO) that were evaluated in the BWFS that led to the components included in the SSIA. The appendix specifically looked at objective release and additional flood space on the Calaveras, Tuolumne, Merced and Upper San Joaquin River watersheds as well as FCO for the Friant, New Exchequer and New Don Pedro dams. The evaluation, which took into account past studies and included a significant modeling effort, and led to inclusion of the</p>	No

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			<p>the flood reservation, is not likely to be able to regulate the FEMA regulatory hydrology to flows within the designated floodway. Today it might be modeled to be able to regulate flows smaller than a 50% annual occurrence. The dedicated floodway capacity of the portion of Modesto subject to flooding is 9,000 cfs, far downstream from the dam, making the practical “objective release” smaller than 9,000 cfs. In 1997 FEAT reported the reservoir peak daily outflow was about 56,000 cfs.</p> <p>If a large storm fills the flood space, Dam Pedro’s operators can take a long time to evacuate the flood space for the next storm because of the limited downstream floodway capacity. As a result, downstream areas can’t depend on having available flood space in New Don Pedro — as that space may have been compromised by prior flood inflows that haven’t been evacuated. The Independent Review Panel made a similar observation basin wide and noted measures that could alleviate the problem of compromised flood reservations:</p> <p>In contrast to the Sacramento Valley, in the San Joaquin Valley, the effectiveness of dam operation for modification of rain-generated floods is substantially limited by the Valley’s minimal floodway capacity. The first flood fills the reservoir, and evacuation of the water is limited by the downstream channel capacities. This makes the likelihood of spilling large flood flows from the reservoir much greater during subsequent flood events. Expansion of floodways in tributary streams would be very helpful for dam operations during floods if the water could be either safely routed through the Sacramento/San Joaquin River Delta or into valley-bottom floodplains.</p> <p>Designated floodways appear to be sized to handle objective releases from upstream dams — or vice versa. They are generally not designed to protect against a target return flow or annual risk flood magnitude. Regardless of the performance measure selected, for the areas downstream of a presently “50-year” dam, inflows larger than “50-year” inflows will probably translate into “inflow equals outflow,” many times the “50-year” objective release. In addition to these issues, summing tributary designated floodway values exceed the designated floodway values of the main stem.</p> <p>The Board should consider evaluation of:</p> <ul style="list-style-type: none">a. Increasing the flood space in the reservoirs,b. Increasing the size of the downstream designated floodways,c. Increasing the size of low-level outlet works,d. Making institutional arrangements for flooding that may exceed the limits of lands within designated floodways or floodplains,e. Revising the reservoir regulation manuals to take better advantage of forecasts, coordinated operations, higher-than-objective-release flood pre-releases to prevent reservoir “inflow equals outflow” events, and improved physical and institutional arrangements downstream. <p>This would require the Board to convene interdisciplinary work among the USACE, DWR, FEMA, FERC, local governments, the Board, and bodies that could fund analysis, institutional changes, and on-the-ground work.</p>	<p>most effective measures being included in the SSIA (increase in storage on the Calaveras and reservoir actions for New Don Pedro including an increase in objective release to 25,000 cfs and forecast informed operation). With the increase in objective release, the associated downstream increase in levee protection (or floodway) was accounted for in the modeling and cost estimates.</p>	
G_FOR1-06	Ronald Stork	Friends of the River	<p>(6) NEW EXCHEQUER DAM</p> <p>The owners of New Exchequer have proposed, without any raise in the main dam, to raise the emergency spillway by ten feet, reducing the height of the emergency spillway to 1.5 feet, thus relying more on the operable radial gates for large outflows. Later they revised this to 6–8 feet. This proposal is based on an assumption that the PMF is less than previously considered. These proposals have not been evaluated by the Division of Safety of Dams, which prefers to wait until it receives an application from the dam’s owners. In any case, the owners are working up a head of steam and have been trying to get Congress to clear away federal wild & scenic river problems with the proposal, potentially bypassing the state’s roles and interests. The state’s dam safety, flood, and other affected agencies should evaluate this proposal soon and should act as appropriate to protect the downstream flood management system, communities, and other state responsibilities.</p> <p>There are important policy issues here that transcend one PMF routing analysis. We believe that state agencies would find, if they took the matter up, (1) that blocking the emergency spillway is not a good idea given expected increases in flood flows because of climate change and (2) neither is it a good idea to decommission or degrade important dam-safety infrastructure desired and built by the original designers of the dam, especially now with expected changes in basin runoff, and (3) it is also not a good idea to have the “emergency response” system relying on radial gates that may fail on the hypothesis “that what could possibly go wrong?”</p> <p>In addition expansion of Exchequer’s reservoir pool would be the first invasion of a National Wild and Scenic River, thus setting an adverse precedent for California’s federally protected rivers, as well as nationally.</p>	<p>This comment is focused on a proposal from other agencies that is outside the scope of the 2017 CVFPP Update.</p>	No
G_FP1-01	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	<p>FloodProtect, the Lower Sacramento – Delta North (LS-DN) regional planning team, has reviewed the November 2016 Sacramento River Basin-wide Feasibility Study (BWFS) and the associated Department of Water Resources (DWR) response to stakeholder comments from May 2016. In coordination with the California Central Valley Flood Control Association, we offer the following comments and recommendations for consideration prior to the Central Valley Flood Protection Board’s adoption of the 2017 Update to the Central Valley Flood Protection Plan (CVFPP).</p>	<p>Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.</p>	No

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G_FP1-02	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	<p>Regarding original comments no. 26, 99, and 159; and DWR responses no. 26, 99, and 159/175</p> <p>Back-check Comment: System Scale Planning – As stated in Section 1.0, “the Sacramento River BWFS primarily evaluates options for improving the bypass system, including potential expansion of the Yolo Bypass, Sacramento Bypass, and Sutter Bypass, as well as the potential for creating a new Feather River bypass”. While bypass expansion can provide additional conveyance capacity for flood water, it cannot replace the continued need for significant levee system improvements along the Sacramento River and its tributaries. Similarly, an expanded bypass can provide additional space for various habitat types; however, this additional space cannot replace the habitat and function of natural river processes on the mainstem of the Sacramento River. The lack of flood risk reduction and ecosystem restoration analysis for the Sacramento River results in the inability to conduct an objective comparison of the proposed bypass alternatives with similar mainstem improvements.</p> <p>Recommended Action: In Section 1.0, the BWFS should explain that the Sacramento BWFS has focused on improvements to existing bypass systems and not on multi-benefit improvements across the entire Sacramento Basin. By contrast The Regional Flood Management Plans (RFMPs) have focused on improvements to mainstem river ecosystems using the guidance, data, and tools of the draft Conservation Strategy with the expectation, that multi-objective improvements to the non-bypass levees will be implemented by the RFMPs through State funded local and regional projects. Accordingly, the BWFS or CVFPP Update should include a recommendation that is consistent with the Conservation Strategy multi-objective projects on the mainstem of the Sacramento River should be developed and implemented through local and regionally-led projects with appropriate State funding.</p>	<p>The Revised Draft Sacramento BWFS published on November 2016 was the last draft of the Sacramento BWFS. That draft incorporated stakeholder comments on the March 2016 Stakeholder Draft Sacramento BWFS. No further comments will be incorporated in the Sacramento BWFS, but will instead be incorporated in the 2017 CVFPP Update as appropriate. The 2017 CVFPP Update includes actions recommended from both the RFMP ad Sacramento BWFS.</p>	No
G_FP1-03	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	<p>Regarding original comments no. 115; and DWR responses no. 115</p> <p>Back-check comment: Sacramento Deep Water Ship Channel – Section 5.5.3 (Page 5-33) states, “With appropriate agreements with USACE, local land use agencies, and Port of West Sacramento operators, a 1,000-foot gated weir structure would be constructed in the navigation levee on the west side of the DWSC to allow up to 60,000 cfs of flood waters to spill into it during a major flood event”. The LS-DN Region continues to be strongly supportive of using the DWSC to mitigate increased flows in the Yolo Bypass over any alternative that requires the construction of setback levees on the west side of the lower bypass. Such an action will require either Congressional action or approval from the U.S. Army Corps of Engineers under 33 USC 408.</p> <p>Recommended Action: Since it appears infeasible to include modification of the DWSC in the on-going Sacramento River GRR, the LS-DN Region supports an additional study on the DWSC as a next step to the Sacramento BWFS Recommended Option.</p>	<p>Comment noted.</p>	No
G_FP1-04	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	<p>Regarding original comments no. 3, 6, 15, 25, 102; and DWR responses no. 3, 6, 15, 25, and 102</p> <p>Back-check Comment: Agricultural Preservation – Section 5.9, Table 5-11 (Page 5-73) indicates that the Recommended Option will convert between 2.3% (1,357 acres) and 3.2% (1,888 acres) of land in the Yolo Bypass to habitat. It further states that between 4.7% (2,773 acres) and 7.7% (4,543 acres) of existing bypass land will be inundated more frequently. Unfortunately, these two categories of agricultural land use impacts are in addition to other impacts associated with changes in agricultural land use due to the construction of new (or replacement) flood risk reduction features as well as compensatory mitigation. The analysis also does not consider the cumulative impacts to agricultural land use from implementation of the 2008 and 2009 State Water Project / Central Valley Project (SWP/CVP) Biological Opinions (BiOps) or California WaterFix. The LS-DN Region appreciates the effort DWR has invested in recognizing the critical value that agriculture in the bypass has both in terms of overall economic impact to Yolo and Solano Counties, as well as its role in maintaining the overall conveyance capacity of the bypass. The LS-DN Region wants to continue to work with DWR to improve the ecological value of agriculture in the bypass while striving to avoid or minimize conversions to other land uses to the greatest extent possible. Neither the BWFS nor the CVFPP should be implemented in a way that is at the expense or detriment of the rural communities and their economies. Related comments were made by the BCFB (S. No 3), CFBF (S. No 6), CCVFCA (S. No 15 & 25), and the DSC (S. No 102).</p> <p>Recommended Action: Table 5-11 should be modified to quantitatively describe the additional conversion of agricultural land necessary to accommodate the flood risk reduction and compensatory mitigation features of each alternative. This same section of the study should be revised to include a narrative discussion of the restoration targets or requirements recommended through other plans and/or projects in the Yolo Bypass / Cache Slough Complex.</p>	<p>The Revised Draft Sacramento BWFS published on November 2016 was the last draft of the Sacramento BWFS. That draft incorporated stakeholder comments on the March 2016 Stakeholder Draft Sacramento BWFS. No further comments will be incorporated in the Sacramento BWFS, but will instead be incorporated in the 2017 CVFPP Update as appropriate.</p>	No
G_FP1-05	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	<p>Regarding original comment no. 93; and DWR response no. 93</p> <p>Back-check Comment: Delta Stewardship Council – Section 1.6, Table 1.2 does not list the Delta Stewardship Council as a State Agency with flood management implementation or permitting responsibilities. While their authority is limited to the boundary of the legal Delta, it is likely that either CVFPP Update, this Sacramento BWFS, and/or implementation of the recommended actions within the legal Delta are a covered action and would require consistency determination with Delta Plan requirements. This could be a challenge for recommended levee repairs and improvements located in the lower bypass and Cache Slough Complex where the Delta Levee Investment</p>	<p>The Revised Draft Sacramento BWFS published on November 2016 was the last draft of the Sacramento BWFS. That draft incorporated stakeholder comments on the March 2016 Stakeholder Draft Sacramento BWFS. No further comments will be incorporated in the Sacramento BWFS, but will instead be incorporated in the 2017 CVFPP Update as appropriate.</p>	No

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			Strategy (DLIS) has rated these levees as low priority for investment. Related comment was made by the DSC (S. No 93). Recommended Action: Update Section 1.6, Table 1.2 to include the Delta Stewardship Council as a State Agency with flood management implementation or permitting responsibilities.		
G_FP1-06	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	Regarding original comment no. 23; and DWR response no. 23 Back-check Response: The response partially addresses the question. If DWR does not plan to establish new design flows and stages, what will be the basis for determining when vegetation and sediment management actions are needed? Our understanding is that DWR’s current practice is to use hydraulic modeling to determine when a channel maintenance action is needed. DWR reviews the condition in the field and then modifies the hydraulic model as appropriate to represent the existing condition. DWR then models the design flow with the existing condition and determine if the design flow can be passed at or below the design stage. If it cannot be passed at, or below, the design stage, then maintenance actions are taken, as appropriate or feasible if there are environmental constraints. If the levees are setback and/or weir’s widened, it is likely that the modeling will always show that the design flow can be passed at, or below, the design stage, which would eliminate the need for channel maintenance. While this has the benefit of reducing DWR’s maintenance costs, it also results in reducing the water surface reduction benefit or requires larger setbacks for the same water surface reduction benefit. If it is DWR’s intention to reduce their channel and bypass vegetation and sediment management obligations, then the report should be transparent about this point and include model runs that displays this effect over time, and what the tradeoff’s result from these effects. Recommended Action: Consideration should be given to adding a summary of this issue to 2017 Update Section 2.3.2 “Perspectives on Operation and Maintenance of the Flood System”, under “Areas for Continuing Conversations” and to Section 4.5.1.	Additional text for “Areas for Continuing Conversations” for the Perspectives on Operations and Management of the Flood System (Section 2.3.2) was included summarizing this issue. The added text states: “A revised hydraulic baseline is needed for any improvements that increase conveyance capacity to make sure those increases are sustained over the long-term future.”	Yes
G_FP1-07	Elisa A; Tim Washburn; Greg Fabun; Bill Emlen; Mike Hardesty	Flood Protect	Regarding original comment no. 24; and DWR response no. 24 Back-check Response: We agree that hydraulic modeling of the flood control system requires many assumptions and that there are uncertainties as to how the system will actually perform in a given flood event. However, we also know that in all of the past large floods, levee failures on the main stem of the SRFCP have occurred at water surface elevations below the top of levee, so modeling the system based on overtopping without failure is not representative of the flood stages we would expect to see in a large flood event. We also recognize the difficulty in trying to evaluate multiple failure assumptions when doing plan formulation. Modeling a realistic levee failure scenario will be particularly important when evaluating the impacts of climate change on system performance to understand how resilient the BWFS recommended option is to climate change and the implications this has to the urban areas. We appreciate DWR’s willingness to include this modeling in the CVFPP update. However, in reviewing the draft CVFPP update, it is not clear where modeling of the system with levee failures was completed. Recommended Action: Consideration should be given to adding a summary of this issue to 2017 Update Section 2.3.2 “Perspectives on Residual Risk Management” under “Areas for Continuing Conversations” and in Section 4.5.1.	Hydraulic modeling took into account the effects of potential levee breaches throughout the entire SPFC system in the Sacramento and San Joaquin basins. Similar to hydraulic modeling conducted in the 2012 CVFPP, levees were simulated to breach when peak stage at an analysis point reached the probable failure point (stage with an 85% probability of levee failure), based on geotechnical conditions. There were over 300 analysis points throughout the SPFC used in the hydraulic analysis. Add sentence on Page 3-32, 2nd paragraph: “Hydraulic modeling accounted for the effects of potential levee breaches based on levee geotechnical conditions.”	Yes
G_GGSA1-01	John McManus	Golden Gate Salmon Association	The Golden Gate Salmon Association is a coalition of salmon fishermen and women, both sport and commercial, and related businesses. As a business-oriented advocacy organization focused on conservation and restoration of Central Valley salmon stocks, with members throughout California, we are pleased to offer our comments on the draft Central Valley Flood Protection Plan 2017 Update (CVFPP). The health and productivity of Central Valley rivers are vitally important to salmon, salmon fishing families, and the communities that depend on salmon for jobs and sustenance. Flood policy and flood management projects are central to the future health of these rivers. And the vast majority of the salmon caught in California are produced by those Central Valley rivers. With that in mind, the CVFPP is an extremely important document to the salmon fishing community. We commend DWR and the Board for your efforts in preparing the draft CVFPP. We support your efforts to establish a more effective flood plan that incorporates a clear focus on multiple benefit projects. In particular, we support the Conservation Strategy’s sharp focus on measureable objectives, including objectives that focus on environmental restoration. We believe that this approach offers a modern strategy that can effectively protect people and property, while contributing to a broader range of societal values. The development and adoption of this plan comes at a critical time, both because of serious recent floods and because of the current precarious state of Central Valley salmon runs.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_GGSA1-02	John McManus	Golden Gate Salmon Association	Flood Policy and California’s Salmon Fishing Industry Before presenting our comments on the draft plan, we offer the following general comments regarding flood policy and the California salmon fishing industry.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No

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			<p>Past flood management policy, with an overwhelming emphasis on traditional dams and levees, has played a major role in the decline of California’s salmon runs and salmon fishing industry. In the past decade, flood management projects also contributed to the first ever, historic closure of the California salmon fishery in 2008 and 2009. A fishery worth an estimated \$1.4 billion in annual economic activity to California in a normal season was shattered. This had devastating impacts on the 23,000 men and women whose livelihoods depend on the commercial and recreational salmon fishery.</p> <p>In part as a result of past flood management policies and projects, the health of our coastal fishing communities has decreased. We’ve seen a decline in the number of commercial salmon boats registered to fish from almost 5,000 in the late 1980’s to just over 1,000 today. Once bustling salmon ports, like Fort Bragg and Eureka are lined with crumbling docks and pier pilings. In some places there aren’t enough fish crossing the docks to maintain basic infrastructure like boat repair yards, fuel docks and ice making machines. Where once proud freshly painted houses beamed pride of fisherman ownership, too many are sadly in need of repair. Go to any harbor with commercial fishing activity and inspect the deck hardware and rigging on boats and you’ll see what deferred maintenance looks like for people who struggle to keep a roof over their family’s heads and pay the bills.</p> <p>Fortunately, in 2008, the State legislature passed the Central Valley Flood Protection Act, steering flood policy toward multiple benefit flood projects and measurable objectives, including environmental and salmon restoration improvements. Specifically, the Act requires that the CVFPP meet multiple objectives, including:</p> <ul style="list-style-type: none">• “Promote natural dynamic hydrologic and geomorphic processes.”• “Increase and improve the quantity, diversity and connectivity of riparian, wetland, flood plan and shaded riverine aquatic habitats.”• “Promote the recovery and stability of native species populations and overall biotic community diversity.”• “Identify opportunities and incentives for expanding or increasing use of floodway corridors.” <p>The updated CVFPP can realize the potential for a new flood policy that can contribute to these objectives, including restoration of healthy salmon runs and a healthy salmon fishery. However, we recommend the following specific improvements in the draft document, prior to adoption.</p>		
G_GGSA1-03	John McManus	Golden Gate Salmon Association	<p>Conservation Strategy: We strongly recommend that DWR and the Board formally adopt the Conservation Strategy (CS) as the foundational approach for the CVFPP.</p> <p>The CS is mentioned at length in the document. However, much of that discussion is general, retrospective and highly qualified. For example, the document includes a brief discussion of the CS on page 2-10. However, that discussion offers highly qualified support for the CS, including a statement that “(t)he Conservation Strategy may continue to inform future phases of RFMP development as future funding and other resources allow” (emphasis added.) We urge DWR and the Board to unequivocally and clearly endorse and incorporate the CS.</p> <p>Specifically, we recommend that DWR and the Board commit to the following in the final CVFPP:</p> <ul style="list-style-type: none">- Formal adoption of the Conservation Strategy in the final CVFPP 2017 Update, with a commitment that it will serve as a foundational, guiding document during implementation.- Inclusion of the Conservation Strategy as an appendix to the final CVFPP 2017 Update.- Use of the Conservation Strategy in the following ways: Use of the CS to quantitatively predict and measure progress toward achievement of ecosystem outcomes, such as those discussed in table 2-1. (See related recommendations below.); Use of the CS to guide planning, design, prioritizing and funding, during implementation of the CVFPP.; Use by DWR and the Board in a public and transparent process to track progress, at the project, regional and systemwide levels, toward achieving multiple outcomes identified in the CS, including outcomes related to salmon; Use of the CS by local partners to track progress toward achievement of measurable objectives.	<p>The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board.</p> <p>The draft CVFPP Conservation Strategy developed non-regulatory measurable objectives to serve as a framework at the regional and systemwide scales for evaluating progress toward recovery of native species over time. These objectives will be used to measure contribution to conservation goals. As stated in the 2017 CVFPP Update, measurable objectives are iterative in nature and may be reevaluated and revised as necessary, based on improvements to scientific understanding and further evaluation of opportunities for multi-benefit flood management projects.</p>	No
G_GGSA1-04	John McManus	Golden Gate Salmon Association	<p>Implementation Tracking and Adaptive Management: Beyond the adoption of the Conservation Strategy and measurable objectives, it is critical that the CVFPP include a detailed strategy to track progress during implementation and assure that an ambitious adaptive management effort will refine implementation to achieve those objectives. Water projects, such as Trinity Dam on the Trinity River, have long promised environmental benefits. In reality, many of these projects have not only failed to achieve these benefits, they have resulted in profound damage to California’s environment and salmon runs. Implementation tracking, accountability and ongoing management are essential steps to ensure that anticipated multiple benefits are achieved on the ground.</p> <p>For example, the draft document’s discussion of “Accountability Through Performance Tracking of Outcomes” states that “(a)chieved outcomes must be tracked, measured, and compared to intended outcomes” (page 2-13). However, the document lacks details regarding the following questions:</p> <ul style="list-style-type: none">- Who, specifically, will be responsible for tracking outcomes, including environmental outcomes?- Who will develop management measures to respond in circumstances where adequate progress is not being made toward measurable outcomes?	<p>The 2017 CVFPP update includes recommendations for the State to identify and develop tracking metrics. In support of the 2022 CVFPP update, DWR will continue to work with stakeholders to help better define the metrics that will be tracked and monitored. This information will then be presented in the 2022 CVFPP update.</p>	No

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			<p>- Who will assure that effective management changes are implemented, where adequate progress toward outcomes is not being made?</p> <p>- How will the implementation effort ensure that it incorporates the best available science?</p> <p>The draft states that “(m)onitoring and tracking of all outcomes to the CVFPP is a challenging process, and relies on adaptive management by DWR and our partner agencies” (page 2-14). The need to monitor and track outcomes is also discussed on page 4-36. However, in these sections, the document does not explain how these responsibilities will be allocated and implemented. Further, Table 2-1 includes data sources for various outcomes, but no discussion of the entity or entities that will be responsible for tracking outcomes for individual projects and system-wide progress.</p> <p>We recommend that the document be revised to provide detailed answers to the above questions.</p>		
G_GGSA1-05	John McManus	Golden Gate Salmon Association	<p>Commercial and Recreational Fisheries: In general, the draft does not adequately discuss the importance of designing and implementing flood projects that contribute to the recovery and maintenance of healthy salmon runs and a commercial and recreational fishing industry. It is not enough merely to help recover listed fish species on Central Valley rivers. The goals for planning, designing and implementing Central Valley flood management projects should include contributing to salmon runs healthy enough to maintain a thriving commercial and recreational fishing industry.</p> <p>Specifically, we recommend the following additions to the draft CVFPP:</p> <p>- Revise the sidebars regarding Multi-benefit Projects (page 2-8) and Integrating Ecosystem Restoration with Flood Risk Management (page 3-13) to include “supporting commercial and recreational salmon fishing.”</p> <p>- Revise Table 2-1, under “Ecosystem Vitality Outcomes,” to include the following example tracking metrics: “Frequency of access to floodplain habitat by salmon and other species,” “Number of salmon and other fish provided access to floodplain habitat” and “Contribution of floodplain habitat to increased size and fitness of juvenile salmon and other species.”</p> <p>We also support, and incorporate by reference, the comments offered in a letter dated today, submitted by American Rivers, CalTrout and several other NGOs.</p>	<p>Page 2-8: Text revised to read: “Multi-benefit projects are designed to reduce flood risk and enhance fish and wildlife habitat, as well as create additional public benefits such as sustaining agricultural production, improving water quality and water supply reliability, increasing groundwater recharge, supporting commercial fisheries, and providing public recreation and educational opportunities, or any combination thereof.”(Recreational fishing is already included within “providing public recreation”).</p> <p>Ecosystem Vitality metrics are derived from the Conservation Strategy. Changes in acres of floodplain inundation already correlate well with the metrics proposed in the comment letter.</p>	Yes
G_GME1-23	Dominick Gulli	Green Mountain Engineering	<p>3.1 Management Actions Included in the 2017 Refined SSIA Portfolio</p> <p>2nd paragraph Page 3.1 states:</p> <p>The following discussion steps through management action categories under four areas of interest that align with DWR implementation programs, including the type of investment (capital or ongoing) needed for each type of action. These management actions are necessary for achieving CVFPP goals, and they inform State decision-making for investing in CVFPP implementation. Policy and financial issues that will constrain or enable implementation of these actions must be addressed if CVFPP goals are to be achieved. Discussion of the drivers, trends, and interdependencies of these issues provides a basis for formulating recommendations meant to drive more effective implementation of the CVFPP in the future.</p> <p>The Plan should have flexibility to be revised as need to accommodate outside the box thinking. The plan has been developed by Urban Engineers and there is significant room for KISS principles.</p>	<p>As described in the text box on Page 1-1, the CVFPP is a programmatic level descriptive document and is not a decisional document for project specific funding or permitting reasons. As such the 2017 CVFPP Update includes recommendations on the State’s investments and policies to support comprehensive flood risk management actions at a local, regional, and systemwide scale.</p> <p>As described in Section 2.1, a collection of potential management actions from various sources, including all six Regional Flood Management Plans (RFMPs). These RFMPs were developed by local stakeholders to understand the regional needs for flood management. As shown in Figure 2-2, this process of refinement is iterative (with every 5-year update of the CVFPP).</p>	No
G_GME1-24	Dominick Gulli	Green Mountain Engineering	<p>For example The FEMA Flood insurance study for San Joaquin County October 16, 2009 describes the Central Valley problem in simple terms: Stockton’s location near the mouth of the San Joaquin River makes the city vulnerable to flood runoff from almost the entire tributary drainage area of the river; only one major tributary joins the main stem downstream from Stockton. In total, excluding Tulare Lake Basin, the city is subject to runoff from approximately 7700 square miles of tributary area</p> <p>Being the low point in the Valley presents significant risk for unheralded flooding and no opportunities for significant bypasses. This winter was a prime example and “had it kept on raining the levees would have broken” Led Zeppelin, and as in 1997 they were Project levees that failed. The sand bars that have developed are larger and new ones formed this year which is the crux of the problem.</p> <p>The System Wide Actions identified on Table 3-1 do not present any scenario of maintaining channel depths anywhere along the San Joaquin River. Significant capacity has been lost due to sedimentation as this has been happening for many years and has reduced the ability to handle flood flows and will continue to do so into the futures.</p> <p>If half the money include in the CVFPP was dedicated to removing silt from the River and placing it on the levees We the People would be much safer in the future.</p>	<p>Regarding using dredging to increase channel conveyance capacity, the ‘Achieve SPFC Design Capacity’ – preliminary approach was studied in the 2012 CVFPP. This approach would only partially address the primary CVFPP goal of improving flood risk management and would result in a highly variable protection throughout the system. Opportunities to integrate ecosystem restoration and enhancement would also be limited and would not contribute to improved ecosystem functions on a systemwide scale. An approach focused on maintenance, repair, and reconstruction of existing facilities would contribute in only a minor way to the supporting goal of multi-benefit projects. This is why the SSIA as proposed in the 2012 CVFPP and updated in the 2017 CVFPP includes a wide variety of management actions to provide for all of the CVFPP goals.</p>	No
G_GME1-25	Dominick Gulli	Green Mountain Engineering	<p>Table 3-2 System wide: Reservoir Storage and operations: Operations, New Reservoir and Transitory Storage should include in the “Project location or required components” should be revised to include “Encourages exploring new reservoirs and transitory storage opportunities in the San Joaquin River basin”</p>	<p>This section of Table 3-2 in the 2017 CVFPP Update was derived from Table 3-2 from the 2012 CVFPP (see the column’s top header). The columns in white present how the 2017 CVFPP Update refined these SSIA elements from the 2012 Plan. As described for both the “New Reservoir Storage” and “Transitory Storage” elements, there are several identified opportunities in the San Joaquin Valley.</p>	No

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				In addition, the CVFPP is not a funding or decisional document. Future planning efforts will continue to study the San Joaquin River Basin for opportunities that meet the State’s desired outcomes (see Chapter 2).	
G_GME1-26	Dominick Gulli	Green Mountain Engineering	Urban Capital Improvements Table 3.2. Target 200-year level of protection. Should not specify “selected projects”. Wording should be included to the effect of “encourages alternate solutions that provide more benefits and reduce environmental impacts”	This section of Table 3-2 in the 2017 CVFPP update was derived from Table 3-2 from the 2012 CVFPP (see the column’s top header). The columns in white present how the 2017 CVFPP update refined these SSIA elements from the 2012 Plan.	No
G_GME1-27	Dominick Gulli	Green Mountain Engineering	Rural Capital Improvements. Table 3.2. should be revised to Site specific Rural Agriculture Repairs should be revised to include” “Will be encouraged if the can provide Delta Specific habitat enhancement components and should not be limited to “what was identified in the RFMP’s”.	The “Summary of Refinements” column of Table 3-2 summarizes how specific elements of the 2012 SSIA (first two columns) were refined using the process described in Section 2.1. Through the RFMP process, project information on site-specific rural-agricultural repairs were identified and used to develop cost estimates and expected outcomes for each region for all of the Central Valley, not just the Delta. For the Delta, there were two RFMPs (please see Figure 2-1). Also, please see response to Comment G_GME1-23. Future iterations of the CVFPP could include additional refinements for Delta specific habitat enhancement components.	No
G_GME1-28	Dominick Gulli	Green Mountain Engineering	Residual Risk Management Enhanced Flood emergency Response; Should include a provision of the State to provide loaded barges and marine equipment on standby during the winter and methods to resell to Delta Levee Districts (highest bidder) if not used. Maybe on an Indefinite Delivery Indefinite quantity type of contract.	The 2017 CVFPP Update already includes a recommendation to promote activities that manage residual risk through implementation of the CVPPF, such as flood emergency preparedness and response management. The specific suggestion in the comment will be shared with the Delta Emergency Preparedness section within DWR.	No
G_GME1-29	Dominick Gulli	Green Mountain Engineering	Page 3-15; Deep Water Ship Channel Tie in. The lock already exists and should be refurbished to accomplish this task to allow Sacramento Boater access the Delta.	The purpose of the Deep Water Ship Channel Tie-in is to convey flood flows and increase the capacity of the Lower Yolo Bypass, instead of to increase recreational boating access. Other design specifics will be considered as part of more detailed project-level planning.	No
G_GME1-30	Dominick Gulli	Green Mountain Engineering	Table 3-5. The Mormon Slough Bypass provides opportunities for Multi-benefits and should be included a s a habitat restoration and recreation	Table 3-5 highlights the potential contributions to the ecosystem for the Yolo Bypass and Paradise Cut systemwide elements for the Sacramento River Basin and the San Joaquin River Basin, respectively. As described in the San Joaquin Basin-Wide Feasibility Study, the Mormon Channel Bypass Regional Element is included in the State Recommended Plan. The 2017 CVFPP incorporated this Recommended Plan and accounts for the benefits in both Maps 3-7 and 3-9.	No
G_MSJRR1-01	Elizabeth Andrews	ESA	<p>Removal of facilities from the State Plan of Flood Control (SPFC)</p> <p>The Mid San Joaquin River Region encompasses at least three major stakeholders with active plans or requests to either change the manner of their SPFC facility operation or even to remove selected facilities from the SPFC:</p> <ul style="list-style-type: none">- US Fish & Wildlife Service (USFWS), manager of the San Joaquin River National Wildlife Refuge, which occupies the lands of RD 2099, RD 2100, and RD 2102;- RD 2092, which manages the lands encompassing Dos Rios Ranch and Hidden Valley Ranch; and- Patterson Westside Farms, which manages properties within RD 1602 and acts on behalf of the RD as the major landowner. <p>Each of these districts is faced with the challenge of modifying the SPFC. For the USFWS, nineteen years after federal land purchase with the intent to manage lands as hydraulically-connected floodplain, much legwork by the USFWS and their partners, and multiple inundation events later, the legal obligation to maintain the SPFC levees to state and federal standards remains. For RD 2092, implementation of the Dos Rios Ranch project as envisioned and generally described in the Draft CVFPP 2017 Update will require SPFC changes to allow flood flows to inundate the lands behind the levees. In the case of Patterson Westside Farms and the landowners of RD 1602, they have determined that OMRR&R costs exceed the benefits their lands receive, and have therefore made a request that they be released from the obligation to maintain their levees to SPFC standards.</p> <p>These RDs are not the only entities with such an interest. The Mid San Joaquin River Regional Flood Management Plan (RFMP) concluded that there are multiple RDs within our region that are not likely to be financially sustainable, given the high cost of OMRR&R and the modest assessment potential of these lands. In addition to the SJRNWR and the two RDs cited above, we expect that there are likely to be two or more additional RDs that would consider requesting a similar pathway if it were clearly available and the implications were better understood.</p> <p>It is not reasonable to expect RDs with insufficient funding to perform required OMRR&R to fund a process to alter or remove their facilities from the SPFC – a process which is currently only hypothetical: to our knowledge, it has never been done. Additionally, if it is in the State’s interest to remove such facilities from the SPFC, DWR should help develop and implement such a process as a pilot effort and then provide financial support to others that wish to follow suit.</p> <p>Indeed, the California Water Code requires that the CVFPP include an analysis on this subject, which neither the 2012 Plan nor the 2017 Update provide. CWC Section 9614 (h) reads as follows, in part: The [Central Valley Flood Protection Plan] shall include all of the following:...</p> <p>(h) The evaluation shall include a list of facilities recommended to be removed from the State Plan of Flood Control. For each facility recommended for removal, the evaluation shall identify both of the following:</p> <p>(1) The reasons for proposing the removal of the facility from the State Plan of Flood Control.</p>	<p>Existing federal and State processes that could be used to remove facilities from the SPFC are described in the SPFC Descriptive Document (2010). DWR acknowledges that modification or removal of SPFC facilities is being pursued within these existing processes at some locations and additional removals are being considered by several reclamation districts, especially in the Mid-San Joaquin Region. The modification or removal of SPFC facilities involves many policy and institutional hurdles and significant coordination across many local, State, and federal agencies. DWR proposes that an implementation committee or working group be chartered to work on this important issue to be considered for the 2022 CVFPP Update. Planning assistance grants may be available to local agencies to plan for SPFC modifications or removal.</p> <p>Ch 2 add bullet to areas of agreement on Perspectives on Coordination with Federal Agencies – Additional guidance is needed for a path forward for LMAs considering removal of facilities from the SPFC, in close coordination with USACE and other affected federal and State agencies.</p> <p>Ch 4, Recommended Actions for Coordination with Federal Agencies. Revise the last bullet, “Work with USACE and LMAs to reevaluate project purposes for SPFC projects, considering facility removal or abandonment, modifications, and/or updates to assurance agreements, O&M manuals, and reservoir operations control manuals to provide different purposes as needed.”</p>	Yes

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			<p>(2) Any additional recommended actions associated with removing the facility from the State Plan of Flood Control. While the 2012 CVFPP includes a very brief section detailing how such facilities may be identified and what analysis and associated mitigation might be required, it does not identify facilities for removal. Nor does the Draft 2017 Update.</p> <p>The Draft CVFPP 2017 Update has made significant progress in identifying and coming to terms with the costs of deferred and annual maintenance, repair, rehabilitation, and replacement of SPFC facilities. It also acknowledges that the costs of Operations, Maintenance, Repair, Rehabilitation, & Replacement (OMRR&R) have increased significantly over time and pose a funding challenge to the LMAs responsible for implementing it. There are very likely some parts of the SPFC for which the current costs to the LMAs for performing OMRR&R – and to the public for oversight, inspection, and management – have outstripped the expected benefit provided by those facilities. This is most likely a possibility in rural areas where land use is agricultural, the crops being grown are relatively low value or flood tolerant, human occupancy is low, and the ratio of levee miles to protected acres is high. Yet the Draft is entirely silent on this point. At minimum, the 2017 Update should note the possibility of this circumstance and express an intention to identify such facilities and develop and support a pathway for their removal where it is desired by or acceptable to the affected landowners and found to be in the State’s interest. We recommend that this issue be added to the list of Flood Management-Related Policy Issues Affecting Implementation of the CVFPP and that the document include a set of recommended actions to allow progress to be made on this issue prior to the 2022 CVFPP Update.</p> <p>An alternative solution, suitable for some, but not all, facilities that would otherwise be recommended for removal, might be the development and adoption of different maintenance standards in rural areas or selected rural areas. This could potentially reduce maintenance costs to a level commensurate with the level of benefits accrued by those facilities, making their retention within the system reasonable.</p>		
G_MSJRR1-02	Elizabeth Andrews	ESA	<p>Sediment Dynamics in the San Joaquin River</p> <p>All three of the San Joaquin Basin RFMPs identified sediment dynamics as a significant issue that needed to be investigated and considered in developing and implementing a flood management strategy in the valley. It is a major factor affecting flood flow conveyance in the San Joaquin River, as well as acting as a major consideration in the selection and design of appropriate flood risk reduction management actions. The Draft 2017 CVFPP Update must acknowledge this issue and express the intent to carry out a basin-scale investigation to address this information gap and apply the resulting understanding to the refinement of the CVFPP in the 2022 Update.</p>	DWR has initiated a sediment transport modeling study for both systemwide and project level scale analysis. The objective of the study is to develop systemwide and project scale sediment transport models capable of analyzing sediment dynamics in the Central Valley in order to support flood management planning, operation and maintenance, project design, ecosystem management, and cost estimates. The study will be conducted in coordination with stakeholders.	No
G_MSJRR1-03	Elizabeth Andrews	ESA	<p>Acknowledgement of Non-governmental Organizations as Implementers</p> <p>Non-governmental organizations are not merely stakeholders with whom flood managers engage in outreach activities; they are key to getting the CVFPP implemented. The Draft CVFPP 2017 Update provides frequent mention of state, federal, and local agency engagement in discussing the implementation of the plan, but neglects to acknowledge the smaller but important role played by non-governmental organizations as implementing entities, be they community organizations engaging in flood preparedness outreach, environmental organizations engaged in habitat restoration projects with flood benefits, or landowner groups working to develop and implement flood risk-sensitive land management strategies. One place in the document that this oversight might be addressed is in the discussion of program implementation (e.g., Floodplain Risk Management, Flood Risk Reduction Projects) on page 4-22 of the document. No doubt there are other locations as well.</p>	<p>Thank you for your comment. In Section 4.3, text was revised to:</p> <p>At the State level, this work is organized into five major flood management programs with DWR staff working closely with CVFPB and other local, State, and federal partner agencies and non-governmental organizations.</p> <p>Under Flood Risk Reduction Projects,” System improvements will generally be implemented through partnership programs among DWR, CVFPB, and USACE, and in coordination with local agencies and NGO’s.”</p>	Yes
G_MSJRR1-04	Elizabeth Andrews	ESA	<p>Climate Change</p> <p>Climate change analysis conducted as part of the development of the CVFPP 2017 Update concluded that the anticipated change in flood conditions in the San Joaquin Valley will be especially dramatic. This circumstance will require that we make equally dramatic changes in our approach to managing and reducing flood risk to prepare for that future. We appreciate the attention to climate change given in the preparation of this document and its supporting studies, and the inclusion of a system-scale vulnerability assessment of the SPFC in the recommended actions under residual risk management. We recommend the addition of a discussion of the implications of climate change for the appropriate strategic flood management response in each of the Sacramento and San Joaquin Basins. While we recognize that climate change understanding has shaped the selection of management actions included, such a discussion would help to shape expectations and focus stakeholder thinking on the kinds of strategies that will build climate resilience.</p>	Concur. A 1-page sidebar was added to Section 3.1 of the 2017 CVFPP Update that describes the implications of climate change for the Sacramento and San Joaquin Basins and potential strategies for climate change resilience.	Yes
G_MSJRR1-05	Elizabeth Andrews	ESA	<p>The development of strategies to address permitting of routine operations and maintenance should be included in your bullets list under routine maintenance activities. It could be accomplished through the following revision:- Develop strategies for long-term system management and maintenance of the SPFC facilities, including strategies to address improved efficiency in permitting routine maintenance activities and legacy system issues such as encroachment and pipe penetrations</p>	The change made as suggested. Section 3.1.2 of the Plan on page 3-23 has been revised to include the following “Develop strategies for long-term system management and maintenance of the SPFC facilities, such as improving the efficiency of permitting routine maintenance activities and addressing legacy system issues such as encroachment and pipe penetrations.”	Yes

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G_MSJRR1-06	Elizabeth Andrews	ESA	The following comment applies to all the “expected outcomes” tables, though it focuses on the table shown in Figure 3-4 in the example chosen. These tables use a 5-point scale, but effectively omit one score, “No potential contribution to this outcome,” making it a 4-point scale. “No potential” is a high bar, a difficult conclusion to reach, so it is not surprising that it is never shown. Redefining this low score as “Little or no potential contribution to this outcome” would make it far more likely to be selected. A score of “Little or no potential contribution to this outcome” is likely more appropriate, for example, in representing the potential for levee improvements to contribute to Ecosystem Vitality than the “Low potential” score it currently shows.	Concur. “No potential contribution” has been deleted.	Yes
G_MSJRR1-07	Elizabeth Andrews	ESA	The term “Resources Baselines” defined in the callout box needs to be linked to the text it is meant to support.	The “Resources Baseline” textbox has been moved to the beginning of Section 3.2.3.	Yes
G_MSJRR1-08	Elizabeth Andrews	ESA	The discussion of O&M starting at the paragraph on the bottom of p. 3-42 seems to attribute all resource management obligations to environmental regulation-driven requirements. It should also acknowledge the state’s interest in environmental stewardship, for example as presented in DWR’s Environmental Stewardship Policy (2010).	The paragraph has been revised to read: "Regulatory demands on the flood system have increased over time, as have societal expectations for a management system that supports multiple benefits. Flood system managers are increasingly being tasked as resource managers with public trust responsibilities, in addition to public safety responsibilities. For example, flood system managers must meet federal flood system maintenance criteria, which require rigorous maintenance of flood system integrity and capacity, and at the same time, comply with environmental protection laws enacted mostly after the State and LMAs accepted responsibility for ensuring O&M of federal projects. State and local flood management agencies are struggling, and in some cases, are not capable of fulfilling their maintenance and repair obligations due to financial constraints and conflicting legal mandates."	Yes
G_MSJRR1-09	Elizabeth Andrews	ESA	The presentation on OMRR&R costs describes both annual costs and deferred ongoing annual maintenance needs. Please revise the text to clarify the nature of the annual “deferred needs estimates” relative to the annual OMRR&R costs. If the \$131M is invested annually, will there be no deferred needs costs accumulating? Revise to clarify.	Deferred maintenance costs are included in the \$131M provided by the OMRR&R Workgroup. The OMRR&R Workgroup estimated how much funding would be needed in the future to not incur any more deferred maintenance. The OMRR&R Workgroup’s annual estimate of \$131M estimate included in the ongoing routine maintenance management action category. Language on page 4-4 has been simplified to clarify this point.	No
G_MSJRR1-10	Elizabeth Andrews	ESA	Figure 4-8 should be checked for consistency with Table 4-5. It shows SSJDD revenues at \$25M/yr, but Table 4-5 suggests that the value should be \$10M/yr.	Figure 4-8 presents the combined capital and ongoing investment amounts needed from each funding mechanism. Whereas Table 4-5 presents capital and ongoing investments separately. In the example of the Sacramento/San Joaquin Drainage District, Table 4-5 lists a capital revenue source of \$10M/year and an ongoing revenue source of \$15M/year. In total, \$25M/year in revenue is needed from the Sacramento/San Joaquin Drainage District and that is listed on Figure 4-8. To avoid confusion in interpretation, a footnote was added to Figure 4-8. The footnote denotes the following: “All estimates provided include both capital and ongoing activities unless otherwise specified.”	Yes
G_MUSR1-01	Barry O’Regan	Mid and Upper Sacramento River Region	<p>In November 2016, on behalf of the Mid and Upper Sacramento River (MUSR) Region, we conducted a ‘red flag’ review of DWR’s Working Draft Central Valley Flood Protection Plan (CVFPP) 2017 Update and offered comments for your consideration (see attached). In back-checking our ‘red flag’ review comments against the CVFPP 2017 Update version released in December 2016 we noticed that some of our comments had not been addressed. Therefore we are resubmitting our original comments for your consideration. (For ease of review we have stricken the comments which were addressed.)</p> <p>The MUSR Region appreciates the willingness of DWR to continue to work with the MUSR Region on this very important planning process and we welcome the opportunity to discuss these comments with your team in the future. If you have any questions, please call me at (916) 403-5900.</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_MUSR1-02	Barry O’Regan	Mid and Upper Sacramento River Region	Section 1.1.1, Page 1-4: We suggest adding a discussion about how the CVFPP aligns with, and sets a framework for accommodating and facilitating California’s projected population and economic growth within the Sacramento and San Joaquin valleys. The California Department of Finance is projecting 70% population growth (4 million plus additional people) within the Sacramento and San Joaquin Valleys over the next 50 years. Due to housing affordability issues in Coastal California, most of California’s future growth is forecasted to occur inland, principally along the I-5 and Highway 99 corridors, in areas which receive flood protection from SPFC facilities. The State of California is investing billions of dollars in improving Central Valley infrastructure, (high speed rail, freeway expansions, etc.) to accommodate this anticipated growth, and the CVFPP Update should make the case that a similar level of investment is needed in SPFC facilities if this projected growth is to occur in a flood risk management responsible way.	<p>Revised text:</p> <p>Page 1-3: “Urban growth and development in areas protected by the SPFC have increased flood risk and have created the need for levels of protection higher than that provided by levees originally intended to protect rural-agricultural areas. This growth is expected to continue over the long-term future as population within the SPFC Planning Area is projected to increase by approximately 70% over the next 50 years (DWR, 2014).”</p> <p>Page 1-14: “Nevertheless, the risk has increased over time. With future population growth in the Central Valley and a lack of sufficient and sustained investments in the flood management system, the risk to life and property will continue to increase.”</p> <p>Section 3.21: “As population growth and urban development continues in the Central Valley’s floodplains, cumulative flood damages and loss of life will likely increase over time. Population growth within the SPFC Planning area is projected at approximately 70% over the next 50 years. Managing the increased flood risk associated with this population growth will require a wide variety of approaches. Structural flood improvements can never fully eliminate the risk of flooding and are costly to construct and maintain over the long-term. An important part of the strategy to reduce flood risk should be to avoid or minimize damages through wise land use and floodplain management policies and investments.”</p> <p>Also, 2067 condition flood risk estimates in the CVFPP Update account for future growth and population over the 50-year planning horizon based on California Water Plan projections.</p>	Yes

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G_MUSR1-03	Barry O’Regan	Mid and Upper Sacramento River Region	Section 1.1.2: Suggest adding a paragraph discussing improvements made in Emergency Response and preparedness.	The text in the paragraph below the bullet points in Section 1.2.2 summarizes the work that has been done for emergency preparedness and response since the 2012 CVFPP.	No
G_MUSR1-04	Barry O’Regan	Mid and Upper Sacramento River Region	Section 1.1.2: Page 1-5: Will more project-specific information be included in an appendix regarding Prop. 1E and Prop. 84 accomplishments and expenditures to date?	No additional information will be included as an appendix to the CVFPP. Project specific information as it relates to both Prop 1E and 84 funding expenditures can be found at: http://www.bondaccountability.ca.gov/default.php	No
G_MUSR1-05	Barry O’Regan	Mid and Upper Sacramento River Region	Section 1.2: Page 1-7: Land use & Floodplain Management: It would be helpful if a definition was provided for what “Floodplain” means in the context of the CVFPP Update. Does “Floodplain” mean SPFC levee protection zones, regulatory floodplains, historical floodplains, areas between levees, all of the above?	Attachment 4 of the 2012 CVFPP defines the “floodplain” as follows: an area adjacent to a stream or river that experiences occasional or periodic flooding. This definition has been added as a footnote to Section 1.3 of the Plan.	Yes
G_MUSR1-06	Barry O’Regan	Mid and Upper Sacramento River Region	Section 1.2: Page 1-7: “Overlapping authorities and conflicting mandates” should be expanded to include how other State policies and mandates such as carbon emissions reduction, reducing in urban sprawl, etc. can conflict with goals for reducing intensification of flood risk.	DWR acknowledges that there are many areas in which overlapping authorities and conflicting mandates is a concern. However, the CVFPP focuses on flood management and the governance and institutional barriers associated directly with it. As DWR continues to work on this issue, we look forward to working with stakeholders to define and start to address this issue.	No
G_MUSR1-07	Barry O’Regan	Mid and Upper Sacramento River Region	Section 2.1.1: “Planning Progress”: We suggest adding a paragraph on progress made with Emergency Response Planning.	Section 2.1.1 describes the planning progress DWR has made since the 2012 CVFPP on CVFPP Planning (not all kinds of planning). The section describes some of the key supporting documents for the 2017 CVFPP.	No
G_MUSR1-08	Barry O’Regan	Mid and Upper Sacramento River Region	Section 2.1.2, Figure 2-3: The boundary for the MUSR region is not correct. The planning area located within Lake County should also be shown.	Figure 2-3 is “Current and Desired Investment Distribution among Implementation Areas of Interest” which does not show RFMP regions. Map 2-1 does show RFMP regions, and the upper right inset shows the additional MUSR regions, including those in Lake County.	No
G_MUSR1-09	Barry O’Regan	Mid and Upper Sacramento River Region	Section 2.1.2, Table 2-1: The “Minimize number of people within the floodplain” and “Minimize property and assets within the floodplain” bullets are not consistent with the State’s population and economic 50-year growth projections and forecasts for the Sacramento and San Joaquin Valleys.	Table 2-1 proves an example of the types of metrics that could be tracked for flood-specific outcomes that contribute towards sustainability. As described in Section 4.5.1, the State recommends that these metrics are further developed in coordination with other Federal, State, and local agencies. As the Central Valley population increases, it is desired that growth be accommodated in ways that are consistent with the wise use of floodplains and minimizes potential risk intensification.	No
G_MUSR1-10	Barry O’Regan	Mid and Upper Sacramento River Region	Section 2.3.2. Page 2-18: Areas for Continuing Stakeholder Conservation: Delete the 3rd bullet. The Central Valley Flood Protection Act of 2008 is very clear; it has only one primary goal which is to improve flood risk management. All other goals are supporting goals. See page 1-3.	The second bullet in the Areas for Continuing Conversations for “Perspectives on Multi-benefit Projects” has revised to read “The best approach to integrating and prioritizing the primary and supporting goals of the CVFP Act of 2008 remain a central point of discussion among DWR and stakeholders.”	Yes
G_MUSR1-11	Barry O’Regan	Mid and Upper Sacramento River Region	Section 2.3.2. Page 2-18: The issue of overlapping authorities and conflicting mandates should be broadened beyond the flood control realm to include State mandates and policies for carbon emissions reduction, economic growth, etc.	DWR acknowledges that there are many areas in which overlapping authorities and conflicting mandates is a concern. However, the CVFPP focuses on flood management and the governance and institutional barriers associated directly with it. As DWR continues to work on this issue, we look forward to working with stakeholders to define and start to address this issue.	No
G_MUSR1-12	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.1, Page 3-2: The word ‘Voluntary’ should be added to wherever the ‘Land Acquisitions and Easements’ management action is discussed.	Comment noted.	No
G_MUSR1-13	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.1, Page 3-3: Recommend removing the phrase “within specific boundaries without encouraging broader development” from the third bullet item (and all other instances where this occurs in the document). Small communities within the MUSR Region play a critical role in supporting the surrounding agricultural industry and they will need to accommodate some level of future growth in order to remain viable. Proposed levee and other infrastructure improvements should be focused on improving public safety and on reducing flood-related damages and liability.	DWR promotes investments that are consistent with the wise use of floodplains. As stated in Chapter 3, the State does not promote flood management improvements that would induce population growth in rural areas. Flood improvements can be made to small communities to accommodate some level of future growth while avoiding broader urban development that would lead to risk intensification and potential increases in aggregate economic and life safety risk.	No
G_MUSR1-14	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.1, Figure 3-3: Additional supporting information should be provided which lists out or shows the proposed capital improvements (e.g., what are the proposed 25 rural levee improvement projects?). Also, for the MUSR Region, the number and nature of the proposed small community actions is not consistent with the MUSR RFMP.	Thank you for your comment. As the CVFPP is a programmatic level descriptive document and not a funding or permitting decision, it does not identify proposed projects. The information that is used in figures, such as Map 3-6 is based off of supporting documents such including RFMPs, the BWFS, and the Conservation Strategy. These figures are meant to show regional priorities and desired outcomes, not specific projects. Implementation of the CVFPP will encourage funding for projects that help achieve those outcomes.	No
G_MUSR1-15	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.2, Page 3-16: The MUSR Region agrees with the no-action recommendation for the Feather River-Sutter Bypass planning area. However, the Region is seeking assurances that future state funding decisions and locally driven projects that feature improvements to the existing levee system will not be hindered due to the lack of a state-recommended plan. A statement should be included in this Section noting that the State still recommends continued investment to address deficiencies in the existing system and improvements for small communities while the planning process for the Feather River-Sutter Bypass area continues over the next 20 years.	Consistent with the Sacramento River BWFS, the following sentence has been added to Section 3.1.2, under the Feather River-Sutter Bypass Multi-Benefit Improvements: "DWR intends to continue investing in the rural-agricultural levee system, (consistent with the CVFPP goals and objectives) and relying on related flood management programs such as the Small Erosion Repair Program (SERP) and other programs that may be developed, as funding becomes available. Given the anticipated lead time to implement potential systemwide improvements in the Feather River-Sutter Bypass system, DWR intends to make those investment decisions on a case-by-case basis, and priority based on current information, which would not be hindered by potential long-term systemwide improvements."	Yes

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G_MUSR1-16	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.2, Page 3-16: Language should be added to clarify what upgrades and modifications are proposed for the Colusa and Tisdale Weirs.	The potential need for upgrades/modifications to the Colusa and Tisdale Weirs and the Butte Basin overflow areas was identified as part of the 2012 CVFPP (on Page 3-14 of the 2012 CVFPP). As described on Page 3-18 of the 2017 CVFPP Update, a recommended option for the Feather River-Sutter Bypass System will need to be refined through future study in close coordination with local and regional stakeholders. If needed, future recommended options could include upgrades and/or modifications to the Colusa and Tisdale Weirs and the Butte Basin small weir structure to divert additional flows into the Sutter Bypass to lower flood stage in the Sacramento River. Any specific modifications or upgrades would be clarified as part of future studies. Page 3-18 of the 2017 CVFPP Update has been modified to read: “In addition to the above actions, options could include upgrade and modification of the Colusa and Tisdale Weirs and the Butte Basin small weir structure to divert additional flow from the Sacramento River to the Sutter Bypass, thereby lowering flood stage in the Sacramento River.”	Yes
G_MUSR1-17	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.2, Page 3-18: The ‘Reservoir Management Actions’ section warrants additional discussion. In comparison to the proposed bypass expansion alternatives, the CVFPP does not evaluate to the same level of detail, potential options for new upstream storage or reservoir modifications. In addition, there is no discussion as to how some of these actions could be integrated to reduce the footprint of the proposed bypass expansions. The California Action Plan has set objectives for developing more reliable water supplies, restoring important species and habitat, and providing more resilient flood protection. It would seem that options for new upstream storage or reservoir modifications should be explored immediately as a means for advancing those objectives. However the draft CVFPP proposes only a few limited reservoir storage actions. Given the current drought conditions, and the uncertainty as to how climate change will impact flood management, water supply, and the regional ecosystem, the discussion regarding potential reservoir management actions should be much more robust and include an explanation as to why new or expanded upstream storage options are not being considered.	<p>The 2017 CVFPP Update is consistent with the 2012 CVFPP. As additional surface storage studies are evaluated, they can be considered in future updates.</p> <p>In the 2012 CVFPP, the SSIA included coordinated reservoir operations aimed at making the most efficient and effective use of current flood storage allocations in existing reservoirs, and implementation of the authorized Folsom Dam Raise (see Section 3.5.4 of the CVFPP). These SSIA storage elements appropriately reflected the conceptual level of detail and systemwide focus of the 2012 CVFPP, without precluding future consideration of new or expanded storage by the State or local agencies. The 2017 CVFPP Update is consistent with the SSIA described in the 2012 CVFPP. The SSIA does not currently include new reservoirs or expansion of storage (other than at Folsom Dam) solely for the purpose of flood management; however, DWR will continue to consider flood management in the context of, and as an objective of, its ongoing surface storage investigations and systemwide reoperation studies. Should these State investigations or other related efforts by local or federal agencies identify flood management as a component of a feasible reservoir storage project, this may be reflected in future updates to the CVFPP.</p> <p>DWR recognizes the importance of developing additional water storage capacity in California to support an increasing population, to help compensate for the anticipated loss of snowpack storage as a result of climate change, and to maintain the important role of Central Valley agriculture for the nation and the world. For these reasons, multipurpose reservoir projects will likely continue to be proposed and, if successful, may help to meet needs for flood storage capacity.</p> <p>However, these proposals face daunting challenges. Despite their benefits, new or expanded reservoirs generally face considerable opposition given their environmental effects, costs, perceived risks, and other factors. Also, environmental laws established mostly in the 1970s now apply to these proposals. Among these laws is the requirement under Section 404 of the Clean Water Act (CWA) that any project affecting waters of the United States can be approved only if it is demonstrated to be the least environmentally damaging practicable alternative. Many other laws also present permitting challenges. It is significant that no new major on-stream reservoir has been constructed in the Central Valley watershed since New Melones Dam was completed in 1978. Recently, successful projects have consisted largely of projects to provide offstream storage (such as Los Vaqueros Reservoir), which can provide only limited flood control benefits outside their watersheds given the need for pumping, and projects to increase the capacity of existing reservoirs (which by their nature are only incremental). Further, increasing storage alone would not achieve many of the CVFPP goals or fulfill legislative intent, such as improving ecosystem functions within the flood management system or achieving an urban level of flood protection for all urban areas.</p>	No
G_MUSR1-18	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.4, Page 3-22: More specific information should be provided in order to clarify what’s included with the ‘repair and rehabilitation of Butte Basin small weir structures’.	Please see response to Comment G_MUSR1-16.	Yes
G_MUSR1-19	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.1.3, Table 3-4: Add the City of Rio Vista to the “Feasibility Studies with Recommended State-Federal Projects” column.	Rio Vista is a small community and not an urban area. It therefore would be out of place in Table 3-4: Key Projects for the Urban Portfolio.	No
G_MUSR1-20	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.2.1: Improved Land Use and Floodplain Management: Pg 3-33: It is not a question of “if urban development continues in the Central Valley” but a question of when, and how much. The CVFPP Update should acknowledge this reality and plan accordingly.	Section 3.2.1 begins with “As urban development continues...” The CVFPP does acknowledge that urban development will continue. Section 2.3.2 has been revised to read “Urban development is expected to continue...”	Yes
G_MUSR1-21	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.2.1: Improved Land Use and Floodplain Management: Pg 3-33: Add a definition for “deep floodplain”.	As defined in the 2012 CVFPP, deep floodplains are defined as those with greater than 3 feet of flooding during a 200-year flood. This information has been added as a footnote to page 3-34 of the 2017 CVFPP Update, as this is the first occurrence of the term in the Plan.	Yes
G_MUSR1-22	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.2.2: Improved Residual Risk Management: Pg 3-33: Ongoing structural improvements and capital investments should be added as tools available to manage residual risk.	.It is acknowledged that structural improvements can reduce flood risk. However the context of the section is residual risk management, which focuses more on floodplain management, O&M, nonstructural actions and emergency preparedness and response. Structural improvements are described previously in Section 3.1.	Yes

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G_MUSR1-23	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.2.4: Operations and Maintenance of the Flood System: See earlier comment regarding changing standards driving the need for additional investment in O&M.	See response to comment G_MUSR1-11	No
G_MUSR1-24	Barry O’Regan	Mid and Upper Sacramento River Region	Section 3.2.6: Effective Governance and Institutional Support: See earlier comment regarding broadening discussion beyond flood management mandates and policies.	See response to Comment G_MUSR1-11	No
G_MUSR1-25	Barry O’Regan	Mid and Upper Sacramento River Region	Section 4.1.3, Table 4-2: The CVFPP has included an assumed amount of \$600M - \$2.3B in the 30-year investment portfolio for future Feather River-Sutter Bypass multi-benefit improvements, even though these improvements have yet to be defined. To prevent confusion, this assumption should also be noted in the ‘Feather River-Sutter Bypass’ Section on page 3-16.	Page 3-18 of the 2017 CVFPP Updates states, “However, a recommended option was not selected from among the Feather River–Sutter Bypass options because it is anticipated that flood management improvements in this region would not be implemented until 2030 or later, after Yolo Bypass multi-benefit improvements are completed. Therefore, the 2017 refined SSIA portfolio includes a range of potential system-scale improvements to the Feather River–Sutter Bypass System that would be further refined through future study to formulate a recommended option in close coordination with local and regional stakeholders.”	No
G_MUSR1-26	Barry O’Regan	Mid and Upper Sacramento River Region	Section 4.2.2, Page 4-13: As currently described, Phase 1 (which includes a proposed 2020 GO Bond) only includes a “beginning investment in small communities” and that an “increasing investment in small communities” does not occur until Phase 2 (which includes a proposed 2030 GO Bond). The MUSR Region strongly urges DWR to prioritize the small community investment so that the majority is included within Phase 1.	The State has prioritized investments to reduce the highest flood risk to the largest number of people for Phase 1.	No
G_MUSR1-27	Barry O’Regan	Mid and Upper Sacramento River Region	Section 4.2.2, Page 4-16: We would like to further understand how the MUSR Region would be impacted by the proposed State River Basin and SSJDD tax assessments. Concerns include adding to the existing local assessments needed for O&M, and eroding the Region’s capacity to generate the local cost share needed for anticipated small community capital improvement projects.	DWR and the CVFPB will work together with stakeholders, including those within the Mid-Upper Sacramento Region, to further explore and evaluate each new potential funding mechanism. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be developed through a transparent and collaborative committee/workgroup process.	No
G_MUSR1-28	Barry O’Regan	Mid and Upper Sacramento River Region	Section 4.5.1, Page 4-26: The proposed policies regarding land use cause concern: a. For the Central Valley, ‘no growth’ within the floodplain is not a realistic policy position; see previous comments regarding central valley population and economic growth projections and forecasts. b. The proposed policies contained in the 2017 CVFPP Update do not provide guidance on how to reconcile flood risk management with other economic and social values. c. MUSR does not wish to “pursue administrative actions to ensure consistency of State floodplain management policies with federal policies”. The Sacramento River RFMPs have in fact convened a taskforce to do the opposite; we are trying to alleviate some of the issues federal floodplain management policies have created for our regions. Federal floodplain management policies (i.e., EO 11988, certain NFIP regulations) are problematic for the Central Valley, particularly when considering that the majority of the central valley is located within an historic floodplain. d. See previous comments regarding State policies encouraging and requiring intensification of development levels in existing urban areas. e. Provide a definition of “high-hazard areas”.	The 2017 CVFPP does not direct land use decisions on behalf of the State, which is the jurisdiction of local agencies. The 2017 CVFPP Update does apply the wise use of floodplains to prioritize State investment in actions that reduce aggregate flood risk, and discourages development in deep, rural floodplains. As stated in the 2012 CVFPP, the SSIA is intended to reduce flood risk in the areas protected by SPFC facilities while discouraging land use changes that promote growth in deep floodplains and increase State flood hazards. The policy is described on Page 3-41. Wise use of floodplains does not stipulate “no growth” within the floodplain, but encourages responsible growth consistent with wise floodplain management. The 2017 CVFPP Update states that urban flood risk reduction investments will be structured to assure that the aggregate economic and life safety risks are hold constant or reduced over time. Past decisions to allow urban development in rural Central Valley floodplains have exposed lives and property to high levels of flood risk, especially in deep or quick-filling basins. If urban development continues in these floodplains, cumulative flood damages and loss of life will likely increase over time. The recommendation “Pursue administrative actions to ensure consistency with federal floodplain management policies.” is ambiguous. This recommendation has been deleted.	Yes
G_NGO1-01	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	We are writing to provide comments on the Central Valley Flood Protection Plan (CVFPP) and associate SPEIR. Our organizations have worked with your staff over the last five years to advance flood protection in a manner that best reduces flood risk while also advancing measureable conservation outcomes. We have written numerous letters to your predecessor urging the Department of Water Resources to develop and finalize a conservation strategy with measureable objectives. We are grateful that the Department recently finalized the conservation strategy, but we are concerned that DWR has still not committed to implement the Conservation Strategy as part of the 2017 Central Valley Flood Protection Plan Update.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation. In regards to the adoption of the Conservation Strategy, supporting documents that the CVPFB selects to adopt as part of the 2017 CVFPP Update is at the discretion of the CVFPB.	No
G_NGO1-02	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	The 2008 Central Valley Protection Act specified that the CVFPP “shall... wherever feasible, meet multiple objectives,” including: - “Promote natural dynamic hydrologic and geomorphic process.” - “Increase and improve the quantity, diversity, and connectivity of riparian, wetland, floodplain, and aquatic habitats; and shaded riverine aquatic habitats, including the agricultural and ecological values of these lands. - “Promote the recovery and stability of native species and populations.” - “Identify opportunities and incentives for expanding or increasing use of floodway corridors” Our organizations have worked diligently with your staff to identify numerous multi-benefit flood management projects that not only meet these objectives, but do so in a manner that better protects the public from dangerous floods. We commend the Department for developing a plan that emphasizes the importance of expanding floodways and bypasses, but we are disappointed that the plan falls short of providing assurances that future flood management activities will be designed to advance measureable conservation and flood management objectives.	The goals of the CVFPP that were adopted in the 2012 CVFPP include the primary goal of “Improve Flood Risk Management” and the supporting goals of “Improve operations and maintenance”, “promote ecosystem functions”, “improve institutional support”, and “promote multi-benefit projects”. The 2017 CVFPP Update maintains consistency with the goals identified in the 2012 CVFPP. Planning efforts for the 2017 CVFPP Update refine the overall near- and long-term investment needs established in the 2012 CVFPP. Future flood management activities conducted by State, federal, local, and private partners will continue to efficiently and effectively advance these CVFPP goals, where feasible. See response to Comment G_FR1-02.	No

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G_NGO1-03	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	Ensuring that the 2017 CVFPP Update includes “specific, measurable, agreed upon, realistic and time-bound” (SMART) objectives to enhance environmental performance of the flood system was also a primary recommendation of the diverse Advisory Committee convened by the Central Valley Flood Protection Board to provide recommendations regarding the Conservation Strategy. The Advisory Committee concluded that clear and transparent objectives are necessary to ensure that the plan obtains the support, permits, and funding necessary for successful implementation. The consensus of the group was that without inclusion of SMART conservation objectives, the 2017 Update will not be functionally implementable.	Thank you for your comments. Please see the response to the Advisory Committee Comments: G_AC1-01 through G_AC1-23 and response to comment G_FOR1-02.	No
G_NGO1-04	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	The 2017 Draft CVFPP promises “accountability through performance tracking” on page 2-12 and identifies several metrics for tracking progress toward measurable conservation outcomes (table 2-1) but the text of the draft plan is unfortunately replete with vague and non-committal language. For example, the metrics identified in table 2-1 are described as “Example Performance Tracking Metrics...” leaving open the possibility that DWR may use other methods to guide future design and investment decisions. After several years of work on the development of metrics, as well as several letters from our organizations on this subject, it is unacceptable for DWR to equivocate at this late date.	As part of the 2017 CVFPP Recommendations for Funding (Chapter 4), DWR is committed to developing the metrics to track outcomes for future investments. While there has been great progress on the development of metrics, there is still work to be done. As part of the work for the 2022 CVFPP, DWR plans to refine the metrics and the system of tracking those metrics. During this process DWR will continue to collaborate and coordinate with stakeholders.	No
G_NGO1-05	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	<p>Our organizations have worked in good faith with DWR and various stakeholders to define measureable objectives for flood system improvement, and we would appreciate DWR reciprocating by explicitly committing to use these objectives. We urge DWR to both adopt the recommendations of the Conservation Strategy Advisory Committee and make modest modifications in the text of the 2017 to clarify that DWR is committed to using measurable objectives as laid out in the Conservation Strategy to guide future policy, design, and funding decisions. Specifically, we request that DWR clarify that:</p> <ul style="list-style-type: none">- The objectives and metrics identified in the Conservation Strategy will be used to quantitatively predict and measure progress toward the ecosystem vitality outcomes in table 2-1.- DWR will use the outcomes and metrics in table 2-1 to guide and prioritize future planning, design, and funding decisions and will encourage local partners to do the same.- DWR will measure, track, and report progress toward achieving measureable outcomes identified in table 2.1.- DWR will not change the measureable outcomes or metrics identified in table 2-1 without first working with the CVFPB to convene a public process to solicit public input.- After full adoption of the plan including the Conservation Strategy, DWR will collaborate with CVFPB to convene a public process to revise and refine table 2-1 and the Conservation Strategy objectives, where necessary, in order to ensure they are consistent with stakeholder input and the best available science.	<p>DWR and CVFPB staff note that the Conservation Strategy measurable objectives are non-regulatory. Instead, they represent goals and objectives to strive for when and where feasible. DWR and CVFPB staff recommended the following revisions:</p> <p>Revise Page 2-13 to read:</p> <p>“As part of achieving the CVFPP supporting goals, the Draft CVFPP Conservation Strategy includes specific metrics to measure contribution to conservation goals and non-regulatory numerical targets at regional (according to Conservation Planning Areas) and systemwide scales for the CVFPP to contribute to recovery of native species (Draft CVFPP Conservation Strategy Appendix L). “These metrics are to be used to support future planning, tracking, and reporting of ecosystem vitality outcomes. In conjunction with 5-year updates to the CVFPP, the targets are iterative in nature and may be updated and revised as necessary, based on improvements to scientific understanding, further evaluation of opportunities for multi-benefit flood management projects, and future collaboration with regional partners.....</p> <p>“Table 2-1 describes metrics using currently available data and information (source listed in the right column) along with metrics that would require additional work to develop, monitor, and track. These example performance metrics will be revised and refined, where necessary, through a transparent process in order to ensure they are consistent with the best available science and stakeholder input. Table 2-2 provides guidance for further development of metrics for outcome-based performance tracking for the CVFPP in future updates. These metrics are intended to be used for monitoring and tracking at a program level for the CVFPP, and are rolled up from more detailed estimates developed as part of the BWFSs and other planning studies (see examples in Chapter 3, Section 3.1.6). In future CVFPP updates, refined performance metrics may be used to measure, track and report progress towards achieving flood-specific outcomes. “</p> <p>Revised sidebar on Page 2-13 to read: “Attainment of these objectives depends on future funding and on contributing actions by the multiple organizations implementing flood projects and operating and maintaining the SPFC.”</p> <p>The multi-benefit actions included in the 2017 SSIA Portfolio were, in large part, identified by the 6 Regional Flood Management Plans and two Basin-wide Feasibility Studies. While all of these plans identified multi-benefit actions where feasible, none of these plans were required to formulate conservation actions that cumulatively achieved the measurable objectives and targets identified in Appendix L of the Conservation Strategy.</p>	Yes
G_RP1-01	Michael Cook	River Partners	<p>Omission: Acknowledgement of Non-governmental Organizations as Implementers</p> <p>River Partners, a 501(C)(3) non-profit organization owns and manages the combined 2100 acre Dos Rios and Hidden Valley Ranches at the confluence of the Tuolumne and San Joaquin Rivers, and adjacent to the San Joaquin River NWR. River Partners also works closely with public and private landowners throughout the Central Valley to implement restoration and floodplain projects at all levels of size and significance. River Partners is also a part of several RD’s (including RD 2092 which encompasses Dos Rios and Hidden Valley Ranches, and RDs 2099, 2100, and 2102 which comprise the San Joaquin River National Wildlife Refuge) in various Flood Management Planning Regions throughout the San Joaquin and Sacramento Rivers. As mentioned in our following comments, these RDs have active plans or requests to remove their levees from the SPFC. Especially in light of recent flood events, River Partners’ implementation, restoration, science and planning skills position us to assist in the implementation of the CVFPP in a unique and powerful way.</p> <p>By example, River Partners shows how NGOs are not merely stakeholders with whom flood managers engage in outreach activities, but essential participants in the implementation of the CVFPP. The California Conservation Corps, The Nature Conservancy, American Rivers, Trust for Public Land, Audubon, and many, many others also play a critically important role. While the Draft CVFPP 2017 Update provides frequent mention of state, federal, and local agency engagement in discussing the implementation of the plan, it neglects the vital role played by non-</p>	Page 4-22: Revised to read: “System improvements will generally be implemented through partnership programs among DWR, CVFPB and USACE, and in coordination with local agencies and NGO’s.”	Yes

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			governmental organizations as implementing entities. This is the case with community organizations engaging in flood preparedness outreach, environmental organizations engaged in habitat restoration projects with flood benefits, or landowner groups working to develop and implement flood risk-sensitive land management strategies. One place in the document that this oversight might be addressed is in the discussion of program implementation (e.g., Floodplain Risk Management, Flood Risk Reduction Projects) on page 4-22 of the document; but it is River Partners’ strong position that the document needs more references to community organizations, and NGOs throughout.		
G_RP1-02	Michael Cook	River Partners	<p>Comment: Other multi-benefit opportunities exist besides Yolo Bypass and Paradise Cut.</p> <p>The Draft CVFPP 2017 Update provides frequent mention of multi-benefit projects as a solution for improving system-wide flood management in the Central Valley. However, the specific management actions proposed in the Update to meet multi-benefit objectives heavily favor improvements made to the Yolo Bypass and Paradise Cut. These projects are great ones, and River Partners is highly supportive, but they are located at the downstream ends of their respective watersheds, and not “catch-all” projects that can meet the goals of the entire Plan – especially for migratory wildlife and anadromous fish species that rely on these systems as a whole. Multi-benefit improvements, no matter their size, need to be identified throughout the system. Their cumulative benefits will meet or surpass those of any single location.</p> <p>This is especially true in the Sacramento and San Joaquin Systems where River Partners is working with American Rivers; the San Joaquin River, San Luis and Sacramento River National Wildlife Refuges; and several other State, NGO, local and federal partners to implement multi-benefit opportunities.</p> <p>In 2012, California’s Department of Water Resources completed a massive effort to take a comprehensive look at the function of our flood management system and find ways to link the ecological and engineering solutions that are needed to provide reliable flood protection for growing urban areas like Stockton while enhancing the value of the flood system for wildlife, water quality, and people. The FloodSAFE California Initiative and the Central Valley Flood Protection Plan envision multi-benefit flood control projects in which the dynamics of a flood fight can synergistically stimulate riverside wildlife and vegetation.</p> <p>Dos Rios Ranch and the adjacent San Joaquin River National Wildlife Refuge stand as a landscape-scale model of such strategic and multi-benefit flood-control projects. By repurposing the flood prone lands behind the levees to act as high quality floodplain habitat for threatened and endangered wildlife AND transient floodwater storage basins during massive flood years, these projects find the sweet spot between two historically competing land uses. Since 2002, River Partners, the USFWS, DWR, and a host of other technical experts, engineers and conservation partners have designed and installed levee breaches, constructed wetland basins, elevated refugia for terrestrial species and vegetation patterns that safely convey floodwaters in a strategic way to optimize the flood protection benefits of the largest contiguous riparian habitat restoration initiative in California at the confluence of the San Joaquin River and its largest tributary. Such multi-benefit projects provide opportunities to link public benefit programs that focus on habitat enhancement and public safety to net large results with small price-tags. Such efforts are demonstrations of the ingenuity and collaboration that will be the hallmark of effective solutions targeting the next 100 years of California’s epic water management conflicts. Reference to them, and acknowledgement of their potential, need to be included in the CVFPP.</p> <p>Below, we have listed the multiple benefits of Dos Rios Ranch and the adjacent San Joaquin River National Wildlife Refuge, alone. This is a model that we believe can, and should, be replicated throughout the system:</p> <ul style="list-style-type: none">- Potential of up to 30,000 acre feet transient floodwater storage- Largest contiguous riparian restoration initiative in California (4,800 acres)- Documented, significant, impact on endangered species recovery (to the degree in some cases where these lands are the difference between extinction and survival) for the following species: riparian brush rabbit, riparian woodrat, least Bell’s vireo, Central Valley Steelhead, Chinook salmon, Western yellow-billed cuckoo, Valley Elderberry Longhorn Beetle, yellow warbler.- Vitally important cross-sector communication among private (NGO, businesses, and agricultural interests of all sizes), local, state and federal organizations.- Tens of millions of dollars (over time, easily in the 100s) coming into the communities, and staying there, for land purchases, supplies, equipment, labor and services.- Improved Flood Management – Located at the confluence of the San Joaquin and Tuolumne Rivers this project provides significant opportunities for attenuating flood flows and for facilitation of flood operations on the Tuolumne and San Joaquin Rivers.- Improved Water Supply Reliability – The project, alone, has retired 12,500 acre feet of riparian diversions annually, and has the potential to retire another 5,000 acre feet per year in the future.	<p>Included a textbox on Page 3-21 that includes a description of Three Amigos and Dos Rios projects. DWR agrees that multi-benefit projects, like Three Amigos/Dos Rios Ranch, provide a wide range of benefits. The 2017 CVFPP Update includes many other multi-benefit projects in addition to the Yolo Bypass and Paradise Cut. DWR supports the development of other multi-benefit projects as new multi-benefit opportunities arise and existing multi-benefit projects are further refined.</p>	Yes

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			<p>- Improved Water Quality – The project will create riparian filter strips adjacent to two of the most important drainages in the Sacramento-San Joaquin Valley. Restored floodplain vegetation serves as a natural filtration system that improves water quality by reducing erosion, trapping sediments and catching pollutants.</p> <p>- Increased Public Recreational Opportunities and Access – This project provides river access at the San Joaquin River NWR and will become an access point to the Lower Tuolumne River Parkway.</p> <p>- Restoration of the San Joaquin and Tuolumne Rivers – The project will be a key contributor to the recovery and restoration of the San Joaquin and Tuolumne Rivers by improving water quality and supply and by increasing habitat important to healthy fish populations.</p> <p>- Improve Flood System Resilience to Climate Change – The project can buffer the impacts of extreme weather events. Additionally, the project is projected to sequester over 1 million tons of CO2 over the life of the project.</p>		
G_RP1-03	Michael Cook	River Partners	<p>Comment: Greatly expand investment in Floodplains and Transitory Storage Actions.</p> <p>In the last few years alone, floodplains have proven to be one of the best approaches to dealing with California’s climate extremes – floods and droughts. During wet years, such as 2017, when rivers swell beyond their channel capacities, floodplains absorb the excess flow, protecting urban areas, recharging groundwater and providing vital aquatic and riparian habitat. When drought cycles back around, previously recharged groundwater is able to be pumped out to serve our cities and farms. This winter, the large releases from Lake Oroville (upwards of 100,000 cfs) caused banks to collapse and challenged the integrity of the levees downstream on the Feather River. At the same time, the two levee setback areas on the Feather River (one at Star Bend and one at the Bear River confluence) performed much better than was expected. Floodplain reconnection projects – for purposes of flood risk reduction, water supply reliability, ecosystem restoration and public recreation – need to be a systemwide priority, and not just a topic briefly discussed in two paragraphs on page 3-21.</p> <p>Transitory flood storage benefits were realized and demonstrable during the 2017 flooding at San Joaquin River National Wildlife Refuge, creating a replicable model that should be described and suggested in the CVFPP Update. In February 2017, the West Side Irrigation District intake canal breached, allowing water to fill the Hagemann Unit of the San Joaquin River NWR. River Partners took note of the gauge stations at both Vernalis (just downstream of the breach) and Mossdale Bridge (over 20 miles downstream of the breach). At both locations, the water level lowered just after the breach, due to the Refuge’s ability to take on flood flows. The water level at the downstream gauge stations remained below flood stage for almost 24 hours following the breach. This would allow downstream communities an additional 24 hours of valuable time for evacuation. This model is replicable in the immediate vicinity of the NWR, at Dos Rios and Hidden Valley Ranches. Transitory storage at this location would allow for an extra 5,000 af of storage if the federal levee were breached at this location. A federal levee breach at Dos Rios and Hidden Valley Ranches would not endanger property or people, only allow for native floodplain habitat restoration to inundate during periods of elevated flow.</p>	<p>The 2012 CVFPP includes floodplain transitory storage actions, many were studied in the SJ BWFS, the CVFPP SSIA includes transitory storage actions that are on a willing seller basis and are consistent with local land use plans, and all affected landowners support such storage and the new flood storage area can be safely isolated from adjacent areas (easements or fee title). While there may be limited opportunities where all of these conditions are met, conditions evolve over time and it is expected that additional transitory storage opportunities will emerge in the future.</p>	No
G_RP1-04	Michael Cook	River Partners	<p>Omission: Acknowledgement of removing obsolete river bank revetment (riprap) as a feasible systemwide improvement action.</p> <p>The Draft CVFPP 2017 Update briefly mentions “restoring river process and geomorphology” as an action to promote ecosystem function, however no specific methods are recommended in order to complete this task. One highly feasible approach to restoring river processes is to remove obsolete revetment from riverbanks, allowing the rivers to meander within their floodplains naturally. Much of the bank revetment found along the Sacramento and San Joaquin Rivers was installed more than 30 years ago (by private landowners, DWR and USACE) to protect the adjacent land uses from erosion. In rural areas, these revetments were installed to protect agricultural fields and orchards. However, since these revetments were installed, several of the agricultural areas they were intended to protect have been acquired by federal (USFWS) and State agencies (CDFW, State Parks) and converted into riparian habitat. Removal of these revetments will enhance and improve the quality of riverine habitat along the banks and off-channel habitat on the adjacent lands.</p> <p>Six (6) locations have already been identified along the Mid/Upper Sacramento River where obsolete revetments can be removed, including riprap at Camp 2 Bend (River Mile 178.5 Right) which currently protects existing riparian habitat on lands owned by DWR. An additional three locations have been identified in the mid-San Joaquin region, including Dos Rios and Hidden Valley Ranches, San Joaquin River NWR, and the Grayson restoration area. In the San Joaquin Region, rip rap removal is imperative to achieving fish passage required by the San Joaquin River Restoration Program (SJRRP). Rip rap removal and implementation of suitable native planting alternatives will contribute to robust shaded riverine aquatic habitat, cooler river temperatures, and food sources for native anadromous species.</p>	<p>Project specific information from the six Regional Flood Management Plans (RFMPs), including the Mid/Upper Sacramento Region and Mid-San Joaquin regions, were used to better understand regional needs and identified projects. This information was used in the development of the 2017 CVFPP Update to refine the SSIA (see Chapter 3) and summarize the outcomes of the various projects, which is the focus of the CVFPP Update. Several of the revetment removal opportunities described in the comment were included in the RFMP’s and in the 2017 CVFPP Update SSIA Portfolio. As described in the text box on Page 1-1, the CVFPP is a programmatic level descriptive document and is not a decisional document for project specific funding or permitting reasons. As funding for specific projects become available (either through local, State, or Federal sources), specific projects will be identified and analyzed for their consistency with the CVFPP.</p>	No
G_RP1-05	Michael Cook	River Partners	<p>The California Water Code requires that the CVFPP include an analysis of the process for removal of levees from the State Plan of Flood Control (SPFC), which neither the 2012 Plan nor the 2017 Update provide.</p> <p>CWC Section 9614 (h) reads as follows, in part: The [Central Valley Flood Protection Plan] shall include all of the following:</p>	<p>See response to G_MSJRR1-01.</p>	No

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			<p>...</p> <p>(h) The evaluation shall include a list of facilities recommended to be removed from the State Plan of Flood Control. For each facility recommended for removal, the evaluation shall identify both of the following:</p> <p>(1) The reasons for proposing the removal of the facility from the State Plan of Flood Control.</p> <p>(2) Any additional recommended actions associated with removing the facility from the State Plan of Flood Control.</p> <p>While the 2012 CVFPP includes a very brief section detailing how such facilities may be identified and what analysis and associated mitigation might be required, it does not identify facilities for removal. Nor does the Draft 2017 Update.</p> <p>Several RD’s in various Flood Management Planning Regions throughout the San Joaquin and Sacramento Rivers have active plans or requests to remove their levees from the SPFC, including RD 2092 which encompasses Dos Rios and Hidden Valley Ranches, and RDs 2099, 2100, and 2102 which comprise the San Joaquin River National Wildlife Refuge. Language should be included in the 2017 Update to at least address this issue and provide guidance or a clear path forward for these RDs.</p>		
G_SRRFA1-01	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>The three Sacramento River planning regions: Mid and Upper Sacramento River; Feather River; and the Lower Sacramento and Delta North (also known as Flood Protect), along with the California Central Valley Flood Control Association (Association), have reviewed the 2017 Central Valley Flood Protection Plan Update (CVFPP Update). We appreciate the effort and investment the Department of Water Resources (DWR) and the Central Valley Flood Protection Board (Board) has made by involving the regional planning teams during the development of this update and through extensive collaboration at Board sponsored Coordinating Committee meetings. Overall, the CVFPP Update captures the majority of our combined efforts over these past five years in identifying region specific priorities and the meaningful and active engagement with local stakeholders throughout the Central Valley.</p> <p>In order for this CVFPP Update to become a reality, continued investment and support of the regional planning process is warranted. The CVFPP Update reflects the majority of input and comments provided over the past five years because of the effective use of an inclusive top-down and bottom-up approach to the planning process, which started with the adoption of the 2012 CVFPP. This process has allowed the local and regional partners to provide meaningful information and remain actively engaged, while the State provided direction, oversight, and several successful forums. Private citizens, local agencies, non-governmental organizations, State and Federal agencies were brought together in a collaborative effort to work toward the goal of producing a usable and contemporary update. We are including the Rural Flood Protection in the Sacramento Valley Report, from October 2011 which was prepared to support the CVFPP and the issues, the guiding goals and recommendations are still relevant in addressing the rural areas during this planning process. This collaborative work, however, is not done, and a similar structure and engagement process is needed in order to move smoothly toward implementation, solidify funding sources, and continuous evaluation of the system from all angles, throughout future updates.</p> <p>Please refer to the attached Comment Paper outlining our collective comments, recommendations and concerns surrounding the following key policy issues:</p> <p>A. Funding B. Climate Change C. Conservation Strategy D. State Liability E. Population Growth F. State Flood Insurance Program G. 2017 Update Overall Implementation</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_SRRFA1-02	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>We request a meeting with applicable Board and DWR staff soon after the close of this public comment period to discuss how our comments and recommendations will be addressed and to allow us to assist in developing the focus of the series of workshops scheduled between April and June. For the workshops, both funding and overall implementation are the policy issues of specific importance to us.</p> <p>We recognize that most of the policy issues presented in the Comment Paper will be further developed for the 2022 Update. As such, we recommend that the Sacramento River planning regions be actively engaged and appropriately funded in order to participate in those efforts. In particular, we recommend the Board establish Advisory Committees to further explore the funding concepts and the State/Regional administered flood insurance program which were introduced in the CVFPP Update. We also recommend that the three Sacramento River planning regions and Association participate in the state-sponsored Climate Change Task Force.</p>	<p>As posted on the Board website, there are several Board Workshops that are being held through the closing of the comment period and the adoption of the 2017 CVFPP Update.</p> <p>We look forward to future coordination and collaboration as DWR responds to comments for the 2017 CVFPP Update and moves forward in developing the 2022 CVFPP Update.</p>	No
G_SRRFA1-03	Tom Fossum, Mike Inamine, Melinda Terry,	Sac River Regions & Flood Association	<p>We feel very strongly that, prior to the Board’s adoption of the CVFPP Update, DWR should incorporate the following recommendations into the CVFPP Update rather than placing them on a Resolution for adoption by reference:</p> <p>1. Describe the consequences and potential State liability associated with an “inaction/no action” approach;</p>	<p>1. See response to comment G_SRRFA1-08. 2. See response to comment G_SRRFA1-09. 3. See response to comment G_SRRFA1-11. 4. See response to comments G_SRRFA1-07.</p>	No

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	Fritz Durst, Greg Fabun		<p>2. Explain how the 2017 CVFPP Update addresses the State’s projected population and economic growth in the Central Valley, and how that risk will be managed;</p> <p>3. Add a chapter focusing on an implementation plan that explains how the policies and programs recommended will be prioritized and executed; and</p> <p>4. Incorporate the final consensus recommendations of the Conservation Strategy Advisory Committee.</p> <p>Again, thank you for your continued support in the regional planning process and for the opportunity to provide critical input to this very important document. We look forward to working with DWR and the Board in the short term on finalizing the 2017 CVFPP Update, as well as in the long term through Advisory Committees, Task Forces, and most notably as a part of RFMP Phase 3. These upcoming activities mark an exciting time to implement change and advance critical improvements and investments to create a resilient and sustainable flood control system and to reduce levels of flood risk to the urban communities and rural agricultural lands along the Sacramento River and Central Valley.</p>		
G_SRRFA1-04	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>Purpose: From the aligned position of the Sacramento River Regions’ (the Regions) and the California Central Valley Flood Control Association (the Association), provide the Central Valley Flood Protection Board (CVFPB) and Department of Water Resources (DWR) messaging and policy issues that the Regions and the Association want to focus on during the Central Valley Flood Protection Plan (CVFPP) 2017 Update (2017 Update) adoption process. This messaging will also set the stage for further engagement on policy issues for the 2022 Update, particularly concerning the development of a State Flood Insurance Program and the Funding Plan implementation.</p> <p>The main issues we have identified during our reviews of both the Stakeholder Draft in November 2016 and the Draft 2017 Update include:</p> <p>A. Funding</p> <p>B. Climate Change</p> <p>C. Conservation Strategy</p> <p>D. State Liability</p> <p>E. Population Growth</p> <p>F. State Flood Insurance Program</p> <p>G. 2017 Update Overall Implementation</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_SRRFA1-05	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>A. FundingIssue Description: The 2017 Update does a good job of describing the amount of funding required for Operations and Maintenance (O&M) and capital improvements, but the identified funding mechanisms lack the basic details and warrant further collaboration and consideration in order to ensure an implementable funding plan.</p> <p>Background: In the past 10 years progress has been made in shoring up levees, but the State Plan for Flood Control (SPFC) is an aging system with an accumulated backlog of deferred maintenance, as well as a need for additional improvements needed to achieve necessary flood risk reduction goals established by the State. The 2017 Update proposes to invest in system-wide improvements, levee improvements and repair, routine removal of sediment/vegetation from SPFC facilities, and ongoing maintenance to improve the ability of the SPFC to reduce flood risk.</p> <p>While much progress has been made to address these improvements through bond-funded large capital projects, continued significant investment is needed to achieve the goals of the 2017</p> <p>Update, not the least of which is the need to ensure that necessary ongoing maintenance is adequately funded. As such, we recognize the need to explore all potential funding options to implement the CVFPP. The Regions believe system-wide improvements provide broad benefits, and that it should be the responsibility of the State to fund construction. Funding for system-wide improvements should be paid for by the State’s General Fund (GF) either through annual appropriations or General Obligation (GO) bonds. If the State proceeds with the evaluation of a property owner assessment for a portion of these costs, the Regions and the State will need to better understand:</p> <p>1. How new State assessments layered on top of existing local assessments will be made equitable across all beneficiaries and local agencies.</p> <p>2. How new State assessments will affect the ability of local agencies to pass new 218 elections to fund future repairs/improvement projects.</p> <p>3. Many of the urban areas have existing assessments that are used to repay bonds that have been sold to fund capital improvements. How is repayment of the bonds addressed if the new State assessments are intended to replace the existing assessments?</p> <p>4. If new State assessments are proposed as an addition to existing assessments, a framework will need to be developed to identify all assessments on a property.</p> <p>5. How do we ensure that ALL the beneficiaries of the flood control system share in the cost of its rehabilitation and/or improvement?</p>	<p>The \$250M/year number has been revised to \$215M/year in Figure 4-8 and was shown for context only. The \$215M/year is existing local revenue to fund current capital and maintenance obligations. It was assumed that this revenue could not be applied to the CVFPP funding plan, with one exception - local maintenance expenditures already currently being spent on SPFC facilities are applied towards the ongoing portion of the 2017 refined SSIA portfolio. A footnote has been added to Figure 4-8 to provide clarification.</p> <p>DWR and the CVFPB will work together with stakeholders to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be explored through a transparent and collaborative committee/workgroup process.</p>	Yes

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			<p>In summary, any consideration of resurrecting the former Sacramento San Joaquin Drainage District (SSJDD) to levy assessments requires a deeper understanding of the existing assessments; specifically how any new regional/valley-wide assessment can be equitably implemented, what the available assessment capacity is given existing local assessments, and how local agency ability to raise local funds needed for future projects may be impacted.</p> <p>Talking Points/Supporting Statements:</p> <ul style="list-style-type: none">- At the time of these comments, the Investment Strategy Technical Memorandum supporting Chapter 4 of the 2017 Update was not available for review. However, we recommend the technical memorandum illustrate the ways in which current property tax burdens and outstanding bond indebtedness will be factored into the proposed State-led property assessments; and local agencies that have previously created sizable assessments to improve system levees will be treated under the proposed regional/valley-wide model to ensure equity for those property owners who have essentially “pre-paid” for substantial system improvements.- DWR should evaluate the Delta Subventions Program as a model for the proposed regional/valley-wide funding mechanism concerning how to identify all system beneficiaries, and how to implement a system-wide funding program wherein local agencies undertake the majority of the system maintenance and improvements.- Figures 4-8 of the 2017 Update misrepresent the current local revenue of \$250M per year. This is not the ongoing annual funding capacity of local agencies. This revenue is primarily derived from long-term (20-30 year) property assessments that are obligated to pay the debt service on existing bonds, which were sold to finance capital projects. There is little-to-no capacity within the \$250M to fund new projects, and there are no local funding mechanisms currently in place—or planned—to cover the proposed \$45 million increase.- Include discussion with regards to the State’s contingency plan if GO bonds are not approved (i.e. increasing GF appropriations, extension of the 30-year timeline, or allowing deferred maintenance and flood risk to increase over time). <p>Recommendation: Establish and fund local participation in an Advisory Committee to the CVFPB to further explore the funding concepts introduced in the 2017 Update.</p>		
G_SRRFA1-06	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>B. Climate Change</p> <p>Issue Description: We do not believe we can make investment-level decisions based on the current climate change findings. The climate change findings can support the development of State policy and system scale planning; however, they are not appropriate to consider as part of project design and implementation. Before we layer on climate change, we need to better understand how the system will perform during a future infrequent flood event. This includes a more accurate estimation of upstream levee performance and fragility. In addition, the climate change findings are vastly different for the two river Basins (Sacramento and San Joaquin) and the same approach may not be suitable for both going forward.</p> <p>Talking Points/Supporting Statements:</p> <ul style="list-style-type: none">- We fully support the State’s effort to better understand how climate change will affect the flood system, and while we believe the analysis has progressed significantly, concerns remain which we believe impact the ability make investment-level decisions based on the current findings.- The climate change findings can support the development of State policy and system scale planning; however, these findings are not appropriate for consideration as part of project design and implementation.- The ability to compare future-with and future-without climate change project conditions will be important for prioritizing investment decisions and will help to better understand how future updates to the CVFPP should consider the associated residual risk.- Levee fragility should be considered in the climate change vulnerability assessment to provide more realistic information on communities at risk in extreme flood events.- The projected increase for the Sacramento River Basin is modest, and it is not clear that additional investment will be needed beyond what is currently proposed in the 2017 Update. As the changes to the San Joaquin Basin are estimated to be substantial, it may be difficult to develop structural solutions to address the changes in hydrology unless upstream storage is considered. <p>Recommendations: Engage the Regions to actively participate in the State-sponsored Climate Change Task Force to continue the development of projections that inform how climate change may change hydrology.</p> <p>Engage the Regions in the preparation of the climate change vulnerability assessment that will inform how the physical extent of the SPFC floodplains may change.</p>	<p>The 2017 CVFPP Update climate change analysis was used for system-scale planning and development of State policy in accordance with the directives and guidance of AB 2800, Executive Order B 30-15, Executive Order S-13-08, Public Resources Code 71155, and the California Natural Resources Agency publication, “Safeguarding California: Reducing Climate Risk (2014)” at a programmatic level. It has not been used to make investment-level decisions, project design, and implementation. While the 2017 CVFPP Update refines the overall near and long-term investment needs established in the 2017 CVFPP, it is not a decision document. Given the current state of climate change science and its uncertainties, application of the climate change projections for design purposes would not be appropriate at this time. A more detailed programmatic account of the climate change analyses and summary of the findings is presented in the supporting document “2017 CVFPP Update – Climate Change Analysis Technical Memorandum”. The document also recommends further study:</p> <ul style="list-style-type: none">■ Addressing uncertainty by evaluating a broader set of future climate scenarios, or sensitivity analyses.■ Additional study to gain insight about reservoir climate vulnerability and potential adaptation needs. <p>The use of levee fragility and flood frequency curves is incorporated into the probabilistic methodology used for the CVFPP flood risk and potential life loss evaluations of the urban levee improvements and systemwide actions. Levee fragility data was developed based on the Nonurban/Urban Levee Evaluations program undertaken by the State. Further details on the methods and sources of data can be found in the “2017 CVFPP Update – Scenario Technical Analyses Summary Report” which supports the 2017 CVFPP Update.</p> <p>The State welcomes RFMP participation in the State-sponsored Climate Change Task Force and stakeholder input into the climate change vulnerability assessment.</p>	No
G_SRRFA1-07	Tom Fossum, Mike Inamine, Melinda Terry,	Sac River Regions & Flood Association	<p>C. Conservation Strategy</p> <p>Issue Description: Continue to support the Conservation Strategy Advisory Committee’s recommended opportunities for habitat enhancement within the existing footprint of the SPFC.</p> <p>Talking Points/Supporting Statements:</p>	<p>Revised Page 2-13 to read: “In conjunction with 5-year updates to the CVFPP, the targets are iterative in nature and may be updated and revised as necessary, based on improvements to scientific understanding, further evaluation of opportunities for multi-benefit flood management projects, and future collaboration with regional partners..... “</p>	No

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	Fritz Durst, Greg Fabun		<p>- The discussion of opportunities for enhancing fish and wildlife habitat as part of improving the flood control system in the Sacramento Valley focuses almost exclusively on opportunities that would be created by setting back existing levees.</p> <p>- The projects in the Regional Flood Management Plans (RFMPs) should be included in determining the best opportunities to achieve the measurable objectives of the conservation strategy. The 2022 Update should include updating the Conservation Strategy Measurable Objectives to consider the projects in the RFMP’s and include the Regions in developing a plan for how the Measurable Objectives will be achieved.</p> <p>Recommendation: Continue the Advisory Committee efforts in support of updating the 2017 Update. We request that the Advisory Committee recommendations that have not been addressed be included in the final CVFPP.</p>	<p>Revise sidebar on 2-13 to read: “Attainment of these objectives depends on future funding and on contributing actions by the multiple organizations implementing flood projects and operating and maintaining the SPFC.”</p>	
G_SRRFA1-08	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>D. State Liability</p> <p>Issue Description: The CVFPP 2017 Update is missing any discussion of the consequences and potential State liability associated with an “inaction/no-action” approach.</p> <p>Talking Points/Supporting Statements:</p> <p>- The State’s liability concerns have driven the CVFPP and legislation mandating higher levels of flood protection for the Central Valley.</p> <p>- The 2017 Update should include a discussion on State liability associated with the federal flood control project to provide important context. The need to continue securing funding is a significant issue that the public, State Executive branch, and State Legislature should be kept aware of.</p> <p>- The 2017 Update should clearly summarize the consequences of inaction, both in terms of life safety and economic impacts. An update to Section 1.4.1 of the 2012 Plan would be a good way to keep the plan relevant.</p> <p>Recommendation: Prior to adoption of the 2017 Update, DWR should add a section that clearly emphasizes and summarizes the consequences of inaction to reinforce the importance of the 2017 Update. These consequences should be summarized in a manner consistent with Chapter 3 of California’s Flood Future: Recommendations for Managing the State’s Flood Risk Report, November 2013.</p>	<p>The following text is proposed to be added to Section 1.1 of the 2017 CVFPP Update:</p> <p>“More than 1 million people live or work in the Central Valley floodplains, which also hosts some of the most productive agricultural land in the nation. In some Central Valley regions, flood risk has been significantly reduced. However, in many areas, people, property and sensitive ecosystems are still at unacceptably high risk from catastrophic flooding. In addition, future floods are expected to cause more damage due to sea-level rise, climate change, subsidence, and future population growth and development within floodplains. Over time, these future drivers threaten to erode the reductions in flood risk achieved to date. Therefore, although significant progress has been made, much remains to be done.</p> <p>The costs of inaction could result in catastrophic consequences, including loss of life, lost jobs, ruined infrastructure (including highways, businesses, hospitals, and homes), and closed businesses that could impact all Californians. Regional agriculture-based economies could be devastated, causing serious impacts to the State economy and disrupting national and international food supplies. After flooding occurs, businesses, homes, schools, and other important structures must be vacated for proper rehabilitation, causing economic and other impacts on families and communities. Communities and livelihoods could further suffer the long-term impacts of plummeting home values, higher flood insurance, and the huge costs of rebuilding. Sustainably investing in flood management now will be a small fraction of the cost of recovering from a major flood disaster later.”</p> <p>Page 3-35 highlights the life loss estimates from the 2017 Without Project Scenario and 2067 Without Project Scenario. The figure highlights that without continued investment in the SPFC, climate change, sea-level rise, and population and land use changes over the next 50 years threaten to increase flood risk over the long-term future. A “Decreased Investment in Central Valley Flood Management” funding scenario was studied in the CVFPP Investment Strategy. It assumed that current funding levels would be frozen and the absence of any new GO bonds would result in only 10% of total capital needs being addressed. Rural and small community areas would be hardest hit by this reduction in State investment.</p>	Yes
G_SRRFA1-09	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>E. Population Growth</p> <p>Issue Description: The State is predicting and planning for significant population growth in the Central Valley. The 2017 Update reaffirms a policy of development avoidance in the floodplain, which is inconsistent with published reports from other State agencies. We need to advance the discussion of how population growth, land use decision-making, and floodplain management are integrated into the development of State-wide policy, as is addressed in the 2017 Update, and beyond.</p> <p>Talking Points/Supporting Statements:</p> <p>- In January 2016, the California Department of Finance identified San Joaquin County as the fastest growing county in the state, closely followed by Yolo County.</p> <p>- The California Department of Finance is projecting that by 2060 there will be a 13.9 million increase in the total state population and 58% population growth (4.5 million plus additional people) within the Sacramento and San Joaquin Valleys occurring over the next 50 years.</p> <p>- Due to housing affordability issues in Coastal California, most of California’s future growth is forecasted to occur inland, principally along the I-5 and Highway 99 corridors, in areas which receive flood protection from SPFC facilities.</p> <p>- The State of California is investing billions of dollars in improving Central Valley infrastructure, (high speed rail, freeway expansions, etc.) to accommodate this anticipated growth, and the 2017 Update should make the case that a similar level of investment is needed in SPFC facilities to maintain, or lower, long-term residual risk levels.</p> <p>Recommendations: We suggest adding a discussion about how the CVFPP recognizes the State’s projected population and economic growth within the Sacramento and San Joaquin valleys, and how long-term residual risk will be managed. This discussion should emphasize the importance of the 2017 Update to California’s long-term economic future. Pages 4-30 include a recommendation for the development of a Floodplain Management Strategic Implementation Plan to guide wise use of the floodplain in California. We recommend the formation of an advisory</p>	<p>See response to Comment G_MUSR1-02.</p>	Yes

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			committee to help develop this plan, as well as other land use policy initiatives that result from implementation of the CVFPP’s recommendations.		
G_SRRFA1-10	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>F. State Flood Insurance Program</p> <p>Issue Description: Given the uncertainty associated with the National Flood Insurance Plan (NFIP) reauthorization, due later this year, and given the funding needs to implement the CVFPP, we support the evaluation of a State Flood Insurance Program that plays the dual role of mitigating flood risk and funding implementation of the CVFPP. The 2017 Update recommends consideration of replacing the NFIP with an alternative State insurance program in order to use a portion of the premiums toward additional flood risk reduction investments. While consideration of this concept is warranted, the Update does not include sufficient information to determine if the proceeds made available for risk reduction are sufficient to offset the significant liability of insuring against catastrophic flood events.</p> <p>Talking Points/Supporting Statements: Discussion for this program likely needs to provide several different options such as:</p> <ul style="list-style-type: none">- Creation of a State-run Flood Insurance Program to replace the NFIP, but designed to recognize the unique topography and risks of the Central Valley;- Inclusion of a residual risk reduction component in a State program, which would help fund non-structural, capital and O&M programs;- Creation of a local area program wherein a local agency complies with NFIP requirements by buying community-wide coverage and also invests in non-structural, capital and O&M projects to aid residual risk reduction. <p>Recommendation: Establish an Advisory Committee to the CVFPB to further discussions considering substitution of a State/Regional administered flood insurance program for the NFIP that includes local participation.</p>	DWR and the CVFPB will work together with stakeholders to further develop and evaluate each new potential funding mechanism. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be developed through a transparent and collaborative committee/workgroup process.	No
G_SRRFA1-11	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	<p>G. 2017 Update Overall Implementation</p> <p>Issue Description: There is no defined approach on how the State plans to implement the various Management Actions outlined in the 2017 Update.</p> <p>Talking Points/Supporting Statements:</p> <ul style="list-style-type: none">- To bolster local support for future Bond measures, the 2017 Update needs to include implementation plans that reflect processes designed to Appropriate dollars for both existing and proposed planning and construction programs.- Consideration needs to be given to establish an implementation strategy that ensures we are getting the greatest benefits from investments achieved, especially in light of funding constraints moving forward. <p>Recommendation: Include a chapter in the 2017 Update that focuses on how the policies and programs recommended in the 2017 Update will be prioritized and executed (assuming funding is secured).</p>	<p>The SSIA Portfolio would be primarily implemented through program delivery (see Section 4.3) as funding becomes available. Each DWR implementation program is responsible for specialized implementation of different types of actions and for overall flood management in the areas protected by SPFC facilities.</p> <p>It is expected that further development and execution of the policy recommendations will be a key focus of the 2022 CVFPP Update. More detailed work plans will be developed for each policy issue immediately after completion of the 2017 CVFPP Update. Stakeholder involvement will be a key part of development of these policy issue work plans.</p>	No
G_YBF1-01	Pete Bontadelli & Robin Kulakow	Yolo Basin Foundation	<p>Thank you for the opportunity to provide comments on the Central Flood Protection Plan 2017 (CVFPP 2017) update. We appreciate your action in response to our letter submitted on November 28, 2016.</p> <p>The Yolo Basin Foundation is dedicated to the appreciation and stewardship of wetlands and wildlife of the Yolo Basin through education and innovative partnerships. Our message to the thousands of people we reach every year is: The Yolo Bypass is a successful mosaic of land uses that provides flood protection, agriculture, habitat and public use. It is a model for sustainable land use in view of the State Capitol.</p> <p>We advocate on behalf of the multi-objective management practiced by the CA Department of Fish and Wildlife (CDFW) at 16,800-acres Yolo Bypass Wildlife Area (Wildlife Area.) We applaud the proposed Yolo Bypass Multi-benefit Improvements described in the CVFPP 2017 update. Integration of the planned expansion of system wide flood protection in the Yolo Bypass with current wetland management and agriculture as well ongoing habitat improvements is essential.</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_YBF1-02	Pete Bontadelli & Robin Kulakow	Yolo Basin Foundation	The commitment made in this plan to extensive stakeholder involvement is also essential. We appreciate the opportunities made for participation of Yolo Bypass stakeholders during the development of the current plan. Yolo Basin Foundation will continue to work with DWR throughout the project specific planning that will be necessary during the phasing in of the Yolo Bypass Multi-benefit Project as well as any updates to the Regional Flood Management Plan. We are committed to facilitating the Yolo Bypass Working Group as a stakeholder forum for this effort into the future.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
G_YBF1-03	Pete Bontadelli & Robin Kulakow	Yolo Basin Foundation	Any actions that modify the frequency and duration of flooding in the Yolo Bypass will have an impact on management of the Yolo Bypass Wildlife Area. The ability of CDFW to adhere to Best Management Practices for managed seasonal and permanent wetlands will be impacted if flooding extends beyond March. The rice growing and cattle grazing operations that are an integral part of management of the Wildlife Area also provide important income for ongoing operations and maintenance. The success of the rice crop and grazing operations are directly	The Yolo Bypass improvements described in the 2017 CVFPP would not change the extent and duration of flooding. The Fremont and Sacramento Weir expansions would maintain their same sill elevations, resulting in no change in the frequency of flooding. However, when the expanded weirs spill, more flow would be entering into the bypass through the weirs. However, the Yolo Bypass is usually inundated already from westside tributaries prior to when weir flow occurs.	No

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			affected by increased frequency and duration of spring flooding. The ability to provide public use and education programming could also be impacted by the proposed projects.		
G_YBF1-04	Pete Bontadelli & Robin Kulakow	Yolo Basin Foundation	It will be essential that DWR consider the effects of changes made to expand the flood carrying capacity of the Yolo Bypass as project specific planning and environmental analysis are undertaken. There could be significant impacts to downstream land uses in the Bypass. Expansion of the Sacramento Weir could mean longer duration flooding as a result of more water being let into the Yolo Bypass by an expanded weir. Construction and operation of a gate on the Deep Water Ship Channel are of special concern to the Yolo Basin Foundation since the proposed gate site is on Toe Drain directly adjacent to the Wildlife Area. In the near term these two projects have the potential for the greatest impact. We look forward to working with DWR in the future as this important plan is implemented.	The impacts of a potential Sacramento Weir and bypass expansion was already studied as part of the USACE American River Common Features EIS/EIR as part of its Recommended Plan. The DWSC tie-in is a Phase 2 improvement that would occur later. Impacts of a potential DWSC tie-in would be described and evaluated as part of the environmental compliance documentation.	No
G_YSFB1-01	Dave Burroughs	Yuba-Sutter Farm Bureau	YSFB remains very concerned about the Flood Plan’s proposed bypass expansion options for the Wadsworth Canal and the Sutter Bypass despite the proposed postponement of any Feather River and Sutter Bypass components until Phase 3. Our concern is stemmed from the large impact and footprint these expansions would have on many thousands of privately owned agricultural lands in Sutter County. YSFB also feels these expansions in the Feather River and Sutter Bypass are unnecessary and unwarranted, at least until maintenance and improvement of the existing system is brought current. In addition, upstream storage and reservoir operation options should be a much more prominent part of the State of California’s long-term flood management strategy for the Central Valley.	In Section 3.1.2, “Feather River-Sutter Bypass Multi-benefits Improvements”, the 2017 CVFPP Update recommends (based on the Sacramento River BWFS) that further study is needed for the Feather River-Sutter Bypass area “to formulate a recommended option in close coordination with local and regional stakeholders.”	No
G_YSFB1-02	Dave Burroughs	Yuba-Sutter Farm Bureau	In 2016, YSFB participated in a year-long Conservation Strategy Advisory Committee process that lead to a set of consensus-based advisory committee recommendations to the Central Valley Flood Protection Board. YSFB remains very concerned about the footprint and effect of a large amount of proposed habitat restoration in the 2017 Update. More specifically the potential hydraulic impacts of accumulated sediments and vegetation that are already clogging our system. The State of California should focus on existing blockages and ensure that we are priming the system for a significant worsening of this problem in the future before placing more habitat in our floodways. We urge the Central Valley Flood Protection Board and Department of Water Resources to remain cognizant of the Conservation Strategy Advisory Committee’s consensus recommendations that the Conservation Strategy have no regulatory effect, that agriculture be integrated as a wise use of our floodplains to the greatest extent possible, and that impacts to agricultural lands be avoided, minimized, and mitigated to the greatest extent possible.	There are many instances in the 2017 CVFPP Update that emphasize these key points: Page 2-3 already states: “The CVFPP Conservation Strategy is a non-regulatory document that provides measurable ecological objectives and long-term approaches for improving riverine and floodplain ecosystems through multi-benefit projects that include.....” Page 2-13 already states: “...the draft CVFPP Conservation Strategy developed non-regulatory measurable objectives to serve as a framework for evaluating progress toward recovery of native species over time.” Page 2-22 “Agricultural lands have economic, environmental, and cultural value and impacts to farmland and local agricultural economics should be minimized. Page 2-22: “The CVFPP should affirm a dedication to agricultural land and water supply stewardship and regional economies.” Page 3-41: “Agricultural conservation measures proposed by the SSIA are also designed to limit conversion of agricultural land to urban uses, and to preserve the robust agricultural economy of the Central Valley.” Page 4-31 states: “Continue to work with the Agricultural Floodplain Ordinance Task Force. The State will continue working with this task force to identify and recommend policies and actions that minimize impacts and preserve agriculture while facilitating the wise use of floodplains. The State will continue to work with the task force to develop the Agricultural Floodplain Ordinance Task Force Report.”	No
G_YSFB1-03	Dave Burroughs	Yuba-Sutter Farm Bureau	YSFB believes that the recently released Investment Strategy for the 2017 Update, the proposed new Sacramento-San Joaquin River Basin Drainage District assessment, River Basin assessment and the potential new State Flood Insurance Program are still poorly defined. YSFB hopes to take an active role in any stakeholder process to further explore the fiscal, legal and political feasibility of the funding mechanisms, however, at this point, our general comments are the existing landowner assessments leveed by the local flood management agencies are already very significant. YSFB notes there is a significant limiting factor of rural partners existing tax base and ability to pay the increased costs, with regards to the increased local cost-shares with the proposed new Sacramento-San Joaquin Drainage District and proposed River Basin Assessments in Phase 1 and 2. This stands in stark contrast to urban areas where local tax revenues and development fees can be more easily absorbed an increased cost share. The Investment Strategy doesn’t address the distinction between rural, urban, and small community cost shares. From YSFB’s perspective, these proposed new funding mechanisms are especially objectionable to the extent they would be used to pay for Phase 3 Feather River and Sutter Bypass features that are strongly opposed in our area.	DWR and the CVFPB will work together with stakeholders to further develop and evaluate each new potential funding mechanism. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be developed through a transparent and collaborative committee/workgroup process. Please see Section 7 of the Draft CVFPP Investment Strategy for Scenario 4d that addresses urban, rural, and small community cost shares.	No
G_YSFB1-04	Dave Burroughs	Yuba-Sutter Farm Bureau	YSFB is also concerned about the proposed land acquisition and easement component of the Investment Plan, including the potential restrictions on agricultural practices under future conservation and flowage easements. YSFB suggests the State should focus on NFIP reforms to provide relief for agricultural structures that would at the same time serve to curb growth by maintaining the long-term sustainability of our agriculturally-based regional economies. YSFB would like to extend an invitation to the State to support current efforts to implement proposed Agricultural Floodplain Ordinance Task Force and pursue potential legislative measures in Congress. YSFB appreciates language in the Investment Strategy noting the need for any potential State Flood Insurance Program to address agricultural structure, however, we are concerned with the proposed mandatory insurance requirement associated with this proposal, targeting a two-fold increase in current NFIP premiums. Furthermore, we are concerned about potential unintended consequences of a State Flood Insurance Program in terms of a potential loss of federal disaster assistance in the event of a major flood. Accordingly, while state and private insurance may	The State is currently working with FEMA within the existing NFIP framework to evaluate and implement changes to improve NFIP. However, as we evaluate data regarding California’s participation in NFIP, we will explore the possibility of a State and/or regional flood insurance program to either augment or replace the NFIP. Federal disaster assistance and benefit provided through FEMA would continue independently of development of a State Flood Insurance Program in the event of a natural disaster.	No

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			warrant further discussion and consideration as a potential long-term option, we see NFIP reforms as the viable near-term path.		
INDIVIDUAL COMMENTS					
I_COATS2-01	Francis Coats	N/A	Please explain why the downhill side of the emergency spillway of the Oroville Dam was not armored in February of 2017; and anything being done to increase the credibility of DWR, given that the public below the dam have been promised for over fifty years that the dam was safe and well maintained. Now we know the emergency spillway was never really completed, never usable, never sound. So, why should we believe anything DWR says? Evidently, DWR and the water contractors are willing to play roulette with our lives, for the sake of shipping water south at the cheapest rate.	Thank you for your comment. For concerns or comments on the Oroville Spillway Incident please call (800) 248-7026 or email: oroville@water.ca.gov .	No
I_PRUNER1-01	Mark Pruner	Pruner Law	<p>Thank you for calling me back in response to my earlier email today, and taking a good amount of time to discuss my questions.</p> <p>My main remaining unanswered question is whether, where and how the drafters took into account the protection and enhancement of the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place (see, e.g., Water Code Sec. 85054; Public Resource Code Sec. 29702).</p> <p>In this regard, Table 1-1, pg. 1-7, of your Draft states as “Action 3”: “Achieve the [sic.] co-equal goals for the Delta”. Your description of Action 3 leave out the second sentence of Water Code Sec. 85054 which states the manner in which the coequal goals are required to be achieved.</p> <p>Also related to this question is whether or not you believe you will need a consistency determination from the Delta Stewardship Council (see, Water Code Sec. 85225). If not, why not.</p> <p>Thank you for passing along these questions for response from the appropriate person at DWR.</p> <p>Please let me know if I have not been clear, of if you need further clarification or expansion on any of the statements above.</p>	<p>These issues are addressed throughout the Plan and the accompanying Conservation Strategy. The “Coequal goals” are specifically addressed in “Action 3”. The CVFPP is descriptive, not decisional and includes recommendations on investments and policies to support comprehensive flood risk management actions. How the “Coequal goals” will be achieved will be addressed through specific projects.</p> <p>DWR has determined that the CVFPP is not a “Covered Action” pursuant to Water Code Section 85057.5(b). The CVFPP is descriptive, not decisional and is not a funding or permitting decision for specific projects. It is expected that future, discrete funded projects through DWR’s funding programs may be potential covered actions, and would need to be considered on a case-by-case basis.</p>	No
I_PRUNER2-01	Mark Pruner	Pruner Law	<p>As noted in my conversation with [Ruth Darling] today, supporting document numbers 4, 7, 9, 10, 13, 14 and 15 are not as of today, March 15th, available to the public for review to aid in understanding and interpreting the Draft Central Valley Flood Protection Plan 2017 Update.</p> <p>Each of these documents is specifically listed by number and title as a “supporting document”. As DWR wrote to the public on its dedicated website for the 2017 Update (http://water.ca.gov/cvfm/2017-cvfpp-docs.cfm), in the first paragraph which introduces the 2017 Update, in the second sentence of the description: “A series of supporting documents accompany the 2017 CVFPP Update to provide a detailed technical, policy, and legal foundation.”</p> <p>I understand that at least some of these documents are not in final form yet. My sense is that at least drafts are available. I also understand from you that summaries of the supporting documents which are not available may be contained somewhere in the 2017 Update.</p> <p>Especially now that we are near the end of the public comment period ending March 31, 2017, how can the public intelligently review and comment on the 2017 Update without being able to see the 7 supporting documents referenced above?</p> <p>Although this email is a comment, please direct my question to the appropriate person at DWR for response in the next few days to aid me in my review of the 20167 Update. Thank you.</p>	<p>Several commenters requested a time extension for comments on the Draft SPEIR and proposed CVFPP Update, since some documents were released following the public release of the 2017 CVFPP Update and Draft SPEIR in December, 2016. Specifically, commenters referenced the updated San Joaquin Basinwide Feasibility Study, the Investment Strategy, and several supporting documents that were still in preparation when the Draft SPEIR was released for public comment in December 2016.</p> <p>The 2017 CVFPP Update was developed, in part, based on information contained in the draft San Joaquin BWFS, dated October 2016, and the Draft SPEIR was prepared based on information contained in the 2017 CVFPP Update and the October 2016 San Joaquin BWFS. The San Joaquin BWFS was updated in response to comments on the October 2016 draft, and a revised draft was published in March 2017. The updates to the San Joaquin BWFS mostly provide clarifying edits to the October 2016 draft, and do not result in substantive changes to the BWFS recommended options.</p> <p>The draft Investment Strategy was released in March, 2017. It describes the expected costs of implementing the CVFPP and presents a strategy to secure funding; it does not include information that would affect the nature and extent of the flood system management recommendations in the CVFPP itself.</p> <p>The several additional supporting documents also identified in the time extension requests generally provide updated information on various topics, such as public engagement and climate change. Those documents may provide administrative record support for the SPEIR, but they do not modify either the CVFPP Update or the SPEIR.</p> <p>As the 2017 CVFPP Update explains, these supporting documents simply inform the 2017 CVFPP – see, for example, CVFPP Section 2.1.1.1. The documents do not alter the CVFPP itself, and in any event the documents are generally consistent with both the 2012 CVFPP as well as the CVFPP Update. In addition, none of these documents are anticipated to be adopted by the CVFPB in connection with the 2017 CVFPB Update. All of the documents that are being considered for adoption (the 2017 CVFPP Update, SPEIR, Updated Flood System Status Report, Updated State Plan of Flood Control Descriptive document) were available for review in December 2016, as was the draft Conservation Strategy.</p> <p>The documents of greatest apparent interest to the commenters also reflect the current status of ongoing planning and feasibility studies that might, if and when funding becomes available, ripen into specific project proposals. At present, these project-level activities are not sufficiently developed to allow additional CEQA analysis beyond the broad programmatic level reflected in the SPEIR. For additional discussion of this topic, please refer to Master Response B.</p> <p>In terms of the request for an extension of the comment period, it needs to be remembered that DWR and the CVFPB have no legal obligation to take comments on the CVFPP Update. As a matter of policy, however, DWR and the CVFPB have engaged in an extensive public participation process, including numerous workshops and the opportunity to</p>	No

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				<p>comment on the December 2016 draft CVFPP Update. That public participation has been very helpful and we believe that it has resulted in better documents.</p> <p>Unlike SB 5, CEQA does provide for a minimum 45-day public comment period, which in this case DWR doubled to 90 days, with comments due on March 30, 2017. DWR believes that this comment period was adequate.</p> <p>Public review of the SPEIR is based upon the project description in that document, which must be “accurate, stable and finite.” Since the documents referenced in the time extension requests do not modify the CVFPP, particularly not in any material way, the SPEIR’s project description continues to satisfy this requirement. Since the project described in the SPEIR has not changed, the fact that some of these documents were not completed until after the December 2016 opening of the public comment period does not provide a basis for further extending the CEQA comment period. Moreover, the documents do not modify or otherwise affect the analysis in the draft SPEIR, particularly not in a way that deprived the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect.</p>	
I_SCHRADER1-01	Don Schrader	N/A	In light of the wonderful job DWR has done this year protecting the people below Oroville Dam flooding I would suggest DWR and the State of California might want to start over and try to get your house in order before trying to develop more plans!	For concerns or comments on the Oroville Spillway Incident please call (800) 248-7026 or email: oroville@water.ca.gov .	No
LOCAL COMMENTS					
L_COL2-01	Glenn Gebhardt	City of Lathrop	Thank you for the opportunity to submit comments on the Draft 2017 Central Valley Flood Protection Plan Update (Draft 2017 CVFPP Update) and the Draft Supplemental Program Environmental Impact Report (Draft Supplemental PEIR) dated December 2016. These documents clearly represent an extreme effort on the part of the Department of Water Resources (DWR). We commend DWR for its efforts to develop and implement a strategic and long-range plan for improving flood risk management in the Central Valley, including San Joaquin County.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_COL1-02	Glenn Gebhardt	City of Lathrop	DWR has not addressed stakeholder comments or released an updated public review draft for the San Joaquin River Basinwide Feasibility Study. Moreover, earlier this month, DWR released a draft Technical Memorandum entitled “Central Valley Flood Protection Investment Strategy” (DWR Investment Strategy) which also is being used to inform State levee investments in the region. Based on our initial review of the DWR Investment Strategy, it appears to be inconsistent with the recently released Delta Stewardship Council Delta Levee Investment Strategy (OLIS) for the region. For example, the Council’s OLIS designates the Reclamation District (RD 17) Levees as Very High Priority for State levee investment to protect the region in a manner consistent with the Delta Plan. Based on our review of the DWR Investment Strategy there are no investment priorities for the RD 17 levees.	DWR released a revised draft San Joaquin River Basin-wide Feasibility Study and a detailed comment response spreadsheet on March 28, 2017. RD 17 levee improvements are described in Section 5.3.2 Urban Capital Investment in the DWR Investment Strategy. There is therefore no inconsistency with the Delta Levee Investment Strategy.	No
L_COM1-01	Miguel Alvarez	City of Modesto	<p>My comment/request for the “Central Valley Flood Protection Plan 2017 Update” is to request maps be created and included, showing the flood boundary over layered on an aerial for the entire length of Tuolumne River (Don Pedro Dam to San Joaquin River) and the affected areas of Dry Creek for three scenarios. The Maps should be based on the following three Scenarios:</p> <ol style="list-style-type: none">1. Objective Release: 9k to 15k cfs2. Objective Release: 9k to 20k cfs3. Objective Release: 9k to 25k cfs <p>As called out in the “Draft San Joaquin River Basin-wide Feasibility Study: Element Performance Summary (For Draft Report. 2016/07/26)” for the Tuolumne River Watershed with no additional flood storage.</p>	<p>Thank you for your comment. The 2017 CVFPP Update is a programmatic level descriptive plan, and is not a funding or permitting decision document. The 2017 CVFPP Update is supported by many documents, including the Sacramento River and San Joaquin River Basin-wide Feasibility Studies (BWFS). The 2017 Update incorporates the overall recommendations of both of the BWFSs, however it does not further analyze various scenarios or technical details.</p> <p>A map of the flooding extent from an objective release of 25,000 cfs from New Don Pedro Reservoir is shown in the San Joaquin River BWFS Appendix 16: Design and Cost Estimates, which is available upon request.</p> <p>Recommendations from either BWFS, if pursued, will need to be further analyzed at a project level, in coordination with local stakeholders during future more detailed planning studies.</p>	No
L_COM1-02	Miguel Alvarez	City of Modesto	<p>The “Central Valley Flood Protection Plan 2017 Update Page 3-20” mentions the following:</p> <p>In addition, increasing objective release capacity in the Tuolumne River system was found to provide substantial public safety benefits within the watershed and downstream (with reductions in peak flow of up to 35,000 cfs on the San Joaquin River at Vernalis).</p> <p>To increase the release to provide substantial public safety benefits within the watershed, low lying area infrastructure (residential, commercial, industrial...etc) will have to be relocated. To calculate the cost and feasibility of these relocations, the agencies who have jurisdiction over the properties in regard to land use planning and are involved in Flood Management, need to have this type of information. I envision the maps to look similar in the information provided in the attached Map, showing the boundary extents of the flood per each release and associated water elevation at incremental locations along the River, with an aerial as a background.</p>	<p>Please see the response to Comment L_COM1-01. As further studies are done, DWR will coordinate and collaborate with local agencies on potential impacts, including those related to land use.</p> <p>The sentence on page 3-20 was revised to read: “In addition, increasing objective release in the Tuolumne River system was found to provide substantial public safety benefits within the watershed and downstream (with reductions in peak flow of up to 35,000 cfs on the San Joaquin River at Vernalis).</p>	No
L_COM1-03	Miguel Alvarez	City of Modesto	<p>Below is more information regarding releases on the Tuolumne, from the “CVFPP October 2016 – Basin-Wide Feasibility Study-San Joaquin Basin Draft”, with so much effort and time invested, these maps would be a good tool to start conversations on what needs to be done for increased releases.</p> <p>4.2.1 Key Findings from Reservoir Simulations</p> <p>During analysis, more than 100 combinations of reservoir management actions were evaluated using systemwide reservoir simulations. Table 4-4 summarizes peak flow rate results for a subset of these options that reflect the</p>	Please see the response to Comment L_COM1-01 and L_COM1_02.	No

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			most promising combinations of objective release and additional flood space options for the Calaveras, Tuolumne, Merced, and Upper San Joaquin river watersheds. [Comment has a screen shot of Table 4-4]		
L_COST1-01	David Kwong	City of Stockton	Thank you for the opportunity to submit comments on the Draft 2017 Central Valley Flood Protection Plan Update (Draft 2017 CVFPP Update) and the Draft Supplemental Program Environmental Impact Report (Draft Supplemental PEIR) dated December 2016. We appreciate the Department of Water Resources’ (DWR) efforts to assist our community in developing and implementing flood management efforts for the San Joaquin Valley region over the years, and commend DWR for its efforts to develop and implement a strategic and long-range plan for improving flood risk management in the Central Valley, including San Joaquin County.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_COST1-03	David Kwong	City of Stockton	<p>We understand that DWR recently has had a lot on its plate with the recent heavy rains and the need to undertake emergency repairs of the State flood protection system, and we appreciate how the recent events of the past several months necessitated diverting DWR staff resources to other more urgent conditions. As a result, it appears that DWR may have had some challenges in releasing various documents intended for public review in a timely manner.</p> <p>As you know, DWR and other State agencies have released or will soon release several plans and reports that purportedly inform and will affect the 2017 CVFPP Update. Currently, it appears that these efforts remain uncoordinated with the 2017 CVFPP Update. For example, before releasing the 2017 CVFPP Update, DWR released the Draft Sacramento River Basinwide Feasibility Study on November 2016. The Sacramento River Basinwide Feasibility Study addressed stakeholder review comments submitted in May 2016 and represented the version of the Sacramento River Basinwide Feasibility Study that DWR is using to support the Draft 2017 CVFPP Update. Unlike the Sacramento River Basin, DWR only recently addressed stakeholder comments and provided the responses to San Joaquin County stakeholders on March 17, 2017, more than 2 months after DWR circulated for the Draft 2017 CVFPP and Draft Supplemental PEIR for public review and comment. DWR released an updated public review draft for the San Joaquin River Basinwide Feasibility Study earlier this week, further complicating the review process. Why has DWR undertaken different review processes for both regions when they are covered by the same Draft 2017 CVFPP and Draft Supplemental PEIR?</p> <p>Earlier this month, DWR released a draft Technical Memorandum entitled “Central Valley Flood Protection Investment Strategy” (DWR Investment Strategy) which also is being used to inform State levee investments in the region. Based on our preliminary review of the responses to the San Joaquin River Basinwide Feasibility Study stakeholder comments and the DWR Investment Strategy, these documents appear to be inconsistent with the recommendations contained in a third State document, the recently released Delta Stewardship Council (DSC) Delta Levee Investment Strategy (DLIS) which will serve as the recommended plan for purposes of proceeding with the DSC’s environmental review process under CEQA later this year. For example, the DSC DLIS designates the RD 17 Levees as Very High Priority for State levee investment to protect the region in a manner consistent with the Delta Plan. According to the DWR Investment Strategy, however, there are no investment priorities for alternatives related to improvements to the RD 17 levees, and although a flood protection alternative is identified for the urbanized Central Stockton area, there are no alternatives included in the Draft 2017 Central Valley Flood Protection Plan Update and the Draft Supplemental PEIR for flood protection for urbanizing areas of San Joaquin County, including all of RD 17. On the one hand, the State is promoting the State’s flood protection investment in urbanizing regions of San Joaquin County, and on the other, it is not - even though State law requires that local land use agencies must assure the provision of 200-year flood protection for urbanizing and urbanized area in the Sacramento-San Joaquin Delta.</p> <p>Due to the uncoordinated state review processes, the inconsistencies in the various public review processes and delays in DWR’s release of associated documents, the City of Stockton requests that DWR extend the comment period on the Draft 2017 Central Valley Flood Protection Plan Update and the Draft Supplemental PEIR for another 30 days until April 30, 2017. A 30-day extension would enable the County to complete its review of the recently-released documents (e.g., the Draft San Joaquin River Basinwide Feasibility Study and the DWR Investment Strategy) and allow the County to revise its existing comments on the Draft 2017 CVFPP Update and Supplemental PEIR to take into consideration the new information DWR recently shared with Stockton.</p>	Please see the response to Comment I_PRUNER2-01.	No
L_COST1-04	David Kwong	City of Stockton	On numerous occasions during the preparation of the Draft 2017 CVFPP Update and San Joaquin River Basinwide Feasibility Study, DWR has been advised of concerns regarding DWR’s proposal to exclude the RD 17 levees for the entire reclamation district from consideration.	DWR has not proposed to exclude RD 17 levee improvements in the 2017 CVFPP Update or the San Joaquin River Basin-wide Feasibility Study. RD 17 levee improvements are included in the 2017 CVFPP Update SSIA Portfolio and San Joaquin River Basin-wide Feasibility Study.	No
L_COST1-05	David Kwong	City of Stockton	Section 1.4 of the CVFPP Update states that the 2017 CVFPP Update provides an updated estimate of investments totaling \$17 to \$21 billion needed over the next 30 years. Implementation of the 2017 refined SSIA portfolio for ongoing improvements is estimate to range in cost annually from \$226 to \$276 million as indicated on page 4-7. We are unclear as to whether the 2017 CVFPP Update policies include any improvements to any of the RD 17 levees outside of the Stockton urban area as further discussed on page 2-8.	The 2012 CVFPP Update does include improvements to RD 17 levees outside of the Stockton urban area. Page 3-25 of Section 3.1.3 Urban Portfolio states: “Also includes proposed levee improvements with USACE and local partners for Lathrop/Manteca.”	No

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L_COST1-06	David Kwong	City of Stockton	DWR representatives claimed that both the Sacramento River Basin and the San Joaquin River Basin were subject to the same public review process with respect to the availability of their respective Basinwide Feasibility Studies (although see page 2-2). However, unlike the process for the Sacramento River Basin in which DWR circulated a draft Basinwide Feasibility Study and responses to stakeholder comments (as of November 2016), DWR circulated the Draft 2017 CVFPP Update and Supplemental PEIR without an updated San Joaquin River Basinwide Feasibility Study or without responses to the stakeholder comments on the prior stakeholder draft of the feasibility study. DWR released responses to comments on the Basinwide Feasibility Study to the stakeholders on March 15, 2017, more than two months into the public review period of the Draft 2017 CVFPP Update and Supplemental PEIR, as discussed above. Consequently, DWR has implemented inconsistent public review processes for the San Joaquin River Basin and the Sacramento River Basin and deprived the public and local agencies in the San Joaquin Valley of an opportunity to review the technical information upon which DWR relied to support the CVFPP Update.	Please see the response to Comment I_PRUNER2-01.	No
L_COST1-07	David Kwong	City of Stockton	The Draft 2017 CVFPP Update states that the plan serves to estimate the costs and implementation approach to achieve the 2008 legislative objective set forth in the Central Valley Flood Protection Act of 2008. The Draft 2017 CVFPP Update does not include any improvements to provide 200-year flood protection for all of RD 17 including the cities of Lathrop and Manteca. The CVFPP Update and the State’s levee investment strategy should focus on protecting existing and future development in urban and urbanized area in a manner consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008.	The 2012 CVFPP Update does include improvements to RD 17 levees outside of the Stockton urban area. Page 3-25 of Section 3.1.3 Urban Portfolio states: “Also includes proposed levee improvements with USACE and local partners for Lathrop/Manteca.”	No
L_COST1-08	David Kwong	City of Stockton	Table 2-1 does not identify any performance tracking metrics for the 2017 CVFPP Update that take into consideration protecting critical infrastructure and facilities. Although the “Public Safety Outcome” identifies the objective of reducing human vulnerability when flooding occurs, none of the metrics include improving protection for critical facilities. the recommendation for State flood management investment should consider the need to protect critical infrastructure and facilities. RD 17 alone, is occupied by more than 60 critical facilities which provide evacuation routes, life-safety facilities and other resources needed during flood events. No analysis provided in the CVFPP Update or the PEIR regarding how the flood management improvements identified in the CVFPP Update would actually protect critical facilities and none of the recommended options contemplate flood management for the existing critical facilities located in RD 17.	Table 2-1 is not intended to be a comprehensive set of performance tracking metrics, but instead includes representative examples of metrics. These performance tracking metrics are intended to track long-term progress towards achieving CVFPP goals. DWR acknowledges that the number of critical facilities protected is a useful performance tracking metric that is currently not included in Table 2-1 and will consider this input as tracking metrics are further refined.	No
L_COST1-09	David Kwong	City of Stockton	Table 3-1 identifies management actions by investment type and area of interest. Urban actions for capital investment include levee improvements, another infrastructure and multi-benefit improvements. Table 3-2 also identifies the need to identify urban capital improvements targeted at 200-year level of protection. None of the options identified in the Draft 2017 CVFPP Update reflect the Fix-In-Place alternative under consideration as part of the State-led feasibility study for RD 17 currently underway as part of the Urban Flood Risk Reduction (UFRR) Program. None of the 2017 CVFPP Update options would provide 200-year flood protection to the urbanized and urbanizing areas of RD 17 that have been planned for development in accordance with the Delta Plan. We request that DWR consider a Fix-in-Place Alternative based on the project under consideration in the UFRR feasibility study for RD 17 or defer any specific recommendations for RD 17 and the San Joaquin River Basin until such time as DWR has completed the UFRR feasibility study and conducted its environmental review of the RD 17 Fix-in-Place Project. To make specific recommendations for alternatives that are infeasible, and/or do not provide 200 year flood protection to urbanizing areas in the San Joaquin River Basin is prejudicing the outcome of the local agencies’ investment in 200-year flood protection solutions by 2025.	<p>Reclamation District 17 (RD 17) and others submitted comments noting that the 2017 CVFPP Update and DWR Investment Strategy did not include 200-year level of protection RD 17 levee improvements (or inclusion was uncertain). The comments noted that lack of inclusion of RD 17 levee improvements would be inconsistent with the Delta Plan and Senate Bill 5. 200-year level of protection levee improvements (and their associated costs) in RD 17 were included in the SSIA Portfolio of the 2017 CVFPP Update and DWR Investment Strategy.</p> <p>Other comments noted that RD 17 improvements included in the Draft 2017 CVFPP Update did not reflect the fix-in-place alternative preferred by local agencies that would protect all future planned development in the area. This would restrict any new development within the 200-year floodplain, and developer funding is needed to fund the local cost share for levee improvements. Another comment noted that it is imperative that 2017 CVFPP Update Phase 1 investments include 200-year level of protection RD 17 levee improvements.</p> <p>Regarding inclusion of RD 17 levee improvements in the 2017 CVFPP Update, please refer to the Program/Project master response. The 2017 CVFPP Update includes RD 17 urban improvements in the SSIA Portfolio, but describes them in general terms. The cost of the RD 17 improvements in the Draft 2017 CVFPP Update, which were included in Phase 1 investments, were derived from the San Joaquin River Basin-wide Feasibility Study. No specific RD 17 levee improvements are shown or recommended in the 2017 CVFPP Update, leaving any specifics open-ended.</p> <p>The USACE Lower San Joaquin River Feasibility Study excluded RD 17 fix-in-place levee improvements from the National Economic Development Plan because they were deemed noncompliant with the Executive Order 11988 on the Wise Use of Floodplains. The State has also described its concerns about promoting urban development within rural, deep floodplains in the 2012 CVFPP and 2017 CVFPP Update.</p> <p>Another commenter requested that the 2017 CVFPP Update defer any specific recommendations for RD 17 improvements until the Urban Flood Risk Reduction Program Feasibility Study is conducted. DWR is in the process of providing an Urban Flood Risk Reduction Planning grant for a feasibility study to explore flood management options in RD 17 that would reflect wise use of floodplains. As stated before, the 2017 CVFPP Update does not provide any specific details on recommended RD 17 improvements. The San Joaquin BWFS only provides planning information about potential larger-scale actions and their expected outcomes, but does not represent a specific funding decision that would preclude the study of other RD 17 alternative options.</p> <p>RD17 and others submitted comment letters making a number of legal assertions concerning the State’s obligations regarding the SPFC in that district. Specifically, after selectively quoting a number of historical documents regarding the flood risk reduction system, RD17 argues that the CVFPP should include increased flood protection measures in RD17, should preclude the development of setback levees, and should generally be designed to support and encourage additional development in the district. RD17 suggests that, in the absence of increased expenditures in</p>	No

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				<p>their district addressing the priorities that they would prefer, the State’s “liability” (presumably referring to “inverse condemnation” liability as described in the “Paterno” decision) would be increased. RD17 also urges that multi-benefit projects (specifically including expenditures supporting habitat improvements) should be deferred until all public safety issues in their district have been addressed. DWR disagrees with RD17’s legal arguments for the reasons set forth below.</p> <p>The 2012 CVFPP and the pending 2017 revision have been guided by the requirements of SB 5, adopted in 2007. A key provision of SB5, Water Code Section 9616, not only authorizes, but directs, DWR (to the extent feasible) to meet multiple objectives. Among the 14 specific objectives listed in Section 9616 are various objectives relating to habitat improvements, as well as an objective to “identify opportunities and incentives for expanding or increasing use of floodway corridors.” The CVFPP explains the critical role that the bypass system has served in reducing flood risks in the Central Valley, and discusses the multiple benefits that could be achieved by the expansion of those floodways.</p> <p>Of particular concern to RD17 is the conceptual discussion of a potential setback levee at the confluence of Old River and the San Joaquin River in the San Joaquin Basinwide Feasibility Study. The San Joaquin BWFS does not make funding decisions, but instead provides planning information on various large-scale actions. Incremental analysis found that a setback levee in this location would be more cost-effective, provide multiple benefits, and maintain the Old River/San Joaquin River flow split, as compared to a fix-in-place alternative. Additionally, RD17’s assertion that setback levees and associated habitat improvements should be excluded from the CVFPP run counter to the directives of SB5, which requires the consideration of multiple benefits.</p> <p>RD17’s comments also ignore the requirements of Government Code Sections 65302.9 and 65860.1, which direct cities and counties in the SPFC planning area to amend their general plans and zoning ordinances to address flood protection concerns. RD17’s comments also ignore the requirements of Government Code Sections 65865.5, 65962, and 66474.5, which generally preclude certain local land use approvals in the absence of a finding by the local agency of an adequate level of flood protection.</p> <p>Several points can be made in response to RD 17’s arguments regarding liability. First, the Paterno decision was issued by a single court of appeal nearly fifteen years ago addressing the State’s liability under a particular set of facts regarding a flood over 31 years ago. The Court evaluated the plaintiffs’ inverse condemnation claim under a number of criteria generally labeled the “Locklin” factors. The potential that a future court will evaluate a future flood damage situation under the Locklin factors and come to a similar conclusion of State inverse condemnation liability is speculative and far from certain. Indeed, courts have concluded otherwise in this complex fact-specific inquiry. e.g. Gutierrez v. County of San Bernardino, 198 Cal.App.4th 831 (2011). Moreover, the Paterno decision specifically rejected several of the arguments being made by RD17, in particular the claim that liability could be predicated on the failure to increase the flow capacity of the flood control system (here, to a 200 year level of protection). The Paterno decision also emphasized “that the State was not an insurer against flood risks, and rejected a claim of liability based on the idea that the State has to increase flood protection simply because the value of property to be protected has increased.” Paterno also predated SB 5 (including the roles specified for cities and counties as described above), as well as the original 2012 adoption of the CVFPP. DWR therefore believes that any future inverse condemnation claim for flood damages will present a very different factual situation than considered by the Court in Paterno, and as such, irrelevant for the purposes of the 2017 Update.</p> <p>RD17 also argues that the existing levee configurations in their district are forever inalterable, based in part on the historical discussion in the early part of its letter. This is simply incorrect. As demonstrated by other levee setback projects in the Central Valley after SB 5, such as the various Three Rivers Levee Improvement Authority projects, the configuration of the SPFC can be altered and can and should include new levee setbacks. Of course, approvals by the Corps of Engineers and the Central Valley Flood Protection Board are required for any such alterations, but nothing precludes the improvement and evolution of the flood risk reduction management system in the way urged by RD17.</p>	
L_COST1-10	David Kwong	City of Stockton	<p>Development within the City’s General Plan boundaries is critical in order to provide tens of millions in developer funding for the local share of the RD 17 levee improvements. The Draft 2017 CVFPP Update states that the “State does not promote flood management improvements that would induce population growth in rural areas.”</p> <p>The problem with the Draft 2017 CVFPP Update is that it does not reflect local agency efforts to provide 200-year flood protection for already urbanized and urbanizing areas that are under development in a manner consistent with the Central Valley Flood Protection Act of 2008 and the Delta Plan. Without development to fund the local share, there is no local funding for levee improvements, including those described in the State Plan of Flood Control.</p> <p>Section 3.2.1 of the Draft 2017 CVFPP Update, however, states that urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety are held constant or reduced over time and will be limited to areas protected by SPFC facilities. The 2017 CVFPP Update, however, does not include improvements to SPFC flood protection facilities that are needed in order to protect urbanizing and urbanized areas of RD 17. This is inconsistent with the Central Valley Flood Protection Act of 2008.</p>	<p>Please see the response to comment L_COST1-09.</p>	No

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L_COST1-11	David Kwong	City of Stockton	<p>The Draft 2017 CVFPP Update provides as a recommended action for land use and floodplain management that the SSIA is intended to reduce flood risk in the areas protected by State Plan of Flood Control facilities “while avoiding land use changes that promote growth in deep floodplains and increase State flood hazards.” The State encourages policies and actions that “avoid, to the extent feasible, putting people and property at risk that are not presently at risk in flood hazard areas.”</p> <p>As noted above, the Draft 2017 CVFPP Update does not include any improvements to provide 200-year flood protection for all RD 17 including the cities of Lathrop, Manteca and Stockton which have existing and planned development allowed in the secondary zone of the Delta pursuant to the Delta Plan. The CVFPP Update policies should address the provision of flood protection for the existing 46,500 residents and the future planned development in urban and urbanized areas in a manner consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008. In fact, the local land use agencies with land use jurisdiction over RD 17 have actually reduced the level of planned development within RD 17. For example, since the adoption of the Delta Plan, the City of Lathrop relinquished an area that was once planned for urban development in the deep part of the floodplain. Thus, the State should clarify the 2017 CVFPP Update land use policy to encourage urban levee improvements that provide flood protection for the entire region, including both existing and future development that is consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008.</p>	Please see the response to comment L_COST1-09.	No
L_COL2-04	Glenn Gebhardt	City of Lathrop	<p>In general, we ask that DWR recognize that, on numerous occasions during the preparation of the Draft 2017 CVFPP Update and San Joaquin River Basin wide Feasibility Study, we advised DWR of our concerns regarding DWR’s proposal to exclude the RD 17 levees for the entire reclamation district from consideration. We also offer the following specific comments regarding the Draft 2017 CVFPP Update:</p>	Please see the response to comment L_COST1-09.	No
L_COL2-05	Glenn Gebhardt	City of Lathrop	<p>Page 1-13 and Chapter 4: Section 1.4 of the Draft 2017 CVFPP Update states that the 2017 CVFPP Update provides an updated estimate of investments totaling \$17 to \$21 billion needed over the next 30 years, Implementation of the 2017 refined SSIA portfolio for ongoing improvements is estimated to range in cost annually from \$226 to \$276 million as indicated on page 4-7. We are unclear as to whether the 2017 CVFPP Update policies include any improvements to the RD 17 levees outside of the Stockton urban area as further discussed on page 2-8.</p>	Please see the response to comment L_COST1-09.	No
L_COL2-06	Glenn Gebhardt	City of Lathrop	<p>Page 2-6: DWR representatives claimed that both the Sacramento River Basin and the San Joaquin River Basin were subject to the same public review process with respect to the availability of their respective Basinwide Feasibility Studies (also see page 2-2). However, unlike the process for the Sacramento River Basin in which DWR circulated a draft Basinwide Feasibility Study and responses to stakeholder comments (as of November 2016), DWR circulated the Draft 2017 CVFPP Update and Supplemental PEIR without an updated San Joaquin River Basinwide Feasibility Study or without responses to the stakeholder comments on the prior stakeholder draft of the feasibility study. DWR released responses to comments on the Basinwide Feasibility Study to the stakeholders on March 15, 2017, more than two months into the public review period of the Draft 2017 CVFPP Update and Supplemental PEIR. Consequently, DWR has implemented inconsistent public review processes for the San Joaquin River Basin and Sacramento River Basin and deprived the public and local agencies in the San Joaquin Valley of an opportunity to review the technical information upon which DWR relied to support the CVFPP Update.</p>	Please see the response to Comment I_PRUNER2-01.	No
L_COL2-07	Glenn Gebhardt	City of Lathrop	<p>Page 2-14: The Draft 2017 CVFPP Update states that the plan serves to estimate the costs and implementation approach to achieve the 2008 legislative objective set forth in the Central Valley Flood Protection Act of 2008. The Draft 2017 CVFPP Update is unclear regarding improvements to provide 200-year flood protection for all of RD 17 including the cities of Lathrop and Manteca. Please confirm the State’s intent that the CVFPP Update and the State’s levee investment strategy should focus on protecting existing and future development in urban and urbanized areas in a manner consistent with the local land use agency General Plans which were found to be consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008.</p>	Please see the response to comment L_COST1-09.	No
L_COL2-08	Glenn Gebhardt	City of Lathrop	<p>Page 2-15: Table 2-1 does not appear to identify performance tracking metrics for the 2017 CVFPP Update that take into consideration protecting critical infrastructure and facilities. Although the “Public Safety Outcome” identifies the objective of reducing human vulnerability when flooding occurs, none of the metrics include improving protection for critical facilities. The recommendation for State flood management investment should consider the need to protect critical infrastructure and facilities. RD 17 alone, is occupied by more than 60 critical facilities which provide evacuation routes, life-safety facilities and other resources needed during flood events. No analysis is provided in the CVFPP Update or the PEIR regarding how the flood management improvements identified in the CVFPP Update would actually protect critical facilities.</p>	Refer to response to comment L_COST1-08.	No
L_COL2-09	Glenn Gebhardt	City of Lathrop	<p>Pages 3-3 through 3-4: We appreciate that Table 3-2 identifies a very high potential contribution for State funding to reduce the chance of flooding in Urban areas. However, Page 3-4 states that the SSIA portfolio reflects an integrated approach that includes the following: “Levee and other infrastructure improvements to provide 200-year level of protection to urban areas to preserve urban development opportunities within specific boundaries without inducing broader urban development in SPFC floodplains that increases aggregate economic and life safety risk.”</p>	<p>In some cases, achieving a 200-year level of protection (and corresponding additional development within the floodplain) will reduce aggregate economic and life safety risk (if reductions in levee failure probability exceed increases in risk from additional development). But in other cases, achieving a 200-year level of protection (and corresponding additional development) will actually increase aggregate economic and life safety risk. It is</p>	No

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			Our concern with this paragraph is that it does not appear to recognize or accept that 200-year LOP will greatly reduce both the existing economic and life safety risk, even after including additional development. SB5 provided a mandate that, assuming State funding of their share of the cost, urban areas should provide 200-year LOP by the year 2025. There was no mandate for changes to existing development plans within incorporated cities that pre-existed SB5, or the Delta Plan. Lathrop is concerned that the Draft 2017 CVFPP Update is attempting to exert land use authority, rather than to focus on resultant improvements to economic and life safety.	acknowledged that local agencies have responsibility for land use authority. The State has responsibility for making wise flood management investments that sustainably reduce aggregate risk to life and property. Please also see the response to comment L_COST1-09.	
L_COL2-10	Glenn Gebhardt	City of Lathrop	Page 3-9: Map 3-2 fails to identify (orange cross hatching) extensive areas of RD 2062 and RD 17 that are protected by urban levees in Lathrop and Manteca.	Thank you for your comment. The “Protected Urban Areas” was developed as part of the 2012 CVFPP. We have revised Map 3-2 and others to reflect updated population information.	Yes
L_COL2-11	Glenn Gebhardt	City of Lathrop	Page 3-26: Table 3-4 fails to include RD 17 improvements that were erroneously removed by the Army Corps from the Lower San Joaquin River Feasibility Study, and yet are needed to provide 200-year LOP to urban areas in Lathrop, Manteca, Stockton and the County of San Joaquin.	Table 3-4 on page 3-26 already includes a bullet that states: “Complete RD 17 Improvements”.	No
L_COL2-12	Glenn Gebhardt	City of Lathrop	Page 3-33: Please explain why the various flood scenarios do not appear to include improvements to the RD 17 levees necessary to provide a 200-year LOP as mandated by the State. Development within the City’s General Plan boundaries is critical in order to provide tens of millions of dollars in developer funding for the local share of the RD 17 levee improvements. One key concern with the Draft 2017 CVFPP Update is that it does not reflect local agency efforts to provide 200-year flood protection for already urbanized and urbanizing areas that are under development in a manner consistent with the Central Valley Flood Protection Act of 2008 and the Delta Plan. Without development to fund the local share, there is no local funding for levee improvements, including those described in the State Plan of Flood Control. Section 3.2.I of the Draft 2017 CVFPP Update states that urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety are held constant or reduced over time and will be limited to areas protected by SPFC facilities. However, the section does not recognize that providing 200-year LOP, even with additional development within City boundaries, will greatly reduce the economic and life safety risks that are currently faced by urban areas within RD 17.	Please see Response to Comment L_COL2-09.	No
L_COL2-13	Glenn Gebhardt	City of Lathrop	Page 4-14: It is imperative that Phase 1 State investments, scheduled for 2017 - 2027, provide all funding required to complete 200-year LOP for urban and urbanizing areas subject to SBS. This is a critical message, as SBS requires completion of 200-year LOP by the year 2025, and this State mandate is nearly impossible to comply with unless State funding is provided, as that funding was promised with SBS.	The State has prioritized investments to reduce the highest flood risk to the largest number of people for Phase 1. Please see the response to comment L_COST1-09.	No
L_COL2-14	Glenn Gebhardt	City of Lathrop	<p>Page 4-30: Recommended Actions include: “Reaffirm and clarify the CVFPP land use policy to guide State Investments.” This bullet states that “the SSIA is intended to reduce flood risk in the areas protected by State Plan of Flood Control facilities while avoiding land use changes that promote growth in deep floodplains and increase State flood hazards. The State encourages policies and actions that avoid, to the extent feasible, putting people and property at risk that are not presently at risk in flood hazard areas.”</p> <p>Based upon analysis to date, it appears evident that the proposed Fix in Place plan to provide 200-year LOP to all of RD 17 will greatly reduce the currently anticipated economic and life loss, even when including the anticipated development that will fund the local share of the 200-year LOP. And yet, the recommended action noted above suggests a blanket restriction on any new development within the 200-year flood plain. The Draft 2017 CVFPP Update should include improvements to provide 200-year flood protection for all of RD 17, including the cities of Lathrop, Manteca and Stockton which have existing and planned development allowed in the secondary zone of the Delta pursuant to the Delta Plan. The CVFPP Update policies should address the provision of flood protection for the existing 46,500 residents and the future planned development in urban and urbanized areas in a manner consistent with the local land use agency General Plans which were found to be consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008.</p> <p>The City of Lathrop recently relinquished 2,200 acres from their Sphere of Influence in an effort to address the State’s concerns regarding development in the deep part of the floodplain. The State should clarify the 2017 CVFPP Update land use policy to encourage urban levee improvements that provide flood protection for the entire region, including both existing and future development that is consistent with the Delta Plan and in accordance with the Central Valley Flood Protection Act of 2008.</p>	<p>The CVFPP is a broad level planning study directed by SB5 to evaluate a number of topics. Although the CVFPP is intended to guide future actions regarding the SPFC, the CVFPP is not a regulatory document in the nature of a local general plan or local coastal program. Specifically, there is no requirement that future actions in the planning area be consistent with the CVFPP. The CVFPP is also scheduled to be revised every five years. As a result, many comments overstate the CVFPP’s role going forward when they assume that the CVFPP will direct, control, or constrain future actions. Instead, the management actions ultimately proposed for implementation in the planning area may well differ from the options currently being considered, based on further evaluation and input from affected stakeholders. Moreover, most of the actions described in the CVFPP are currently unfunded, and would need to be analyzed at a project level, making their future implementation somewhat speculative.</p> <p>The 2017 CVFPP Update includes RD 17 urban improvements in the SSIA Portfolio, but describes them in general programmatic terms. The cost of the RD 17 improvements in the Draft 2017 CVFPP Update, which were included in Phase 1 investments, were derived from the San Joaquin River Basin-wide Feasibility Study. No specific RD 17 levee improvements are shown or recommended in the 2017 CVFPP Update and in any event would require project level analysis and refinement, leaving any specifics open-ended.</p> <p>The USACE Lower San Joaquin River Feasibility Study excluded RD 17 fix-in-place levee improvements from the National Economic Development Plan because they were deemed noncompliant with the Executive Order 11988 on the Wise Use of Floodplains. The State has also described its concerns about promoting urban development within rural, deep floodplains in the 2012 CVFPP and 2017 CVFPP Update. The 2017 CVFPP Update specifically states that SSIA improvements are designed to reduce the chance of flooding while discouraging population growth in rural floodplains, with the intention of reducing aggregate flood risk. It further states that urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety risks are hold constant or reduced over time.</p>	No
L_COL2-19	Glenn Gebhardt	City of Lathrop	P. 1-4, Section 1.2 sidebar “Key Concepts of the CVFPP”: the 4th bullet of “CVFPP Supporting Goals” describes “multi-benefit” as equivalent to IWM. “Promote ecosystem functions” is listed as a separate goal with its own set of measurable objectives. We are glad that that this distinction is made between the separate goals of multi-benefit and ecosystem enhancement. However, we question why the synonymous term “multi-benefit” is needed, when IWM is an accepted term from the CWAP broadly used in water management planning. We suggest just using the term IWM to eliminate confusion. Throughout the remainder of the CVFPP, the term multi-benefit is inconsistently used and/or redefined.. In many locations, especially related to the Conservation Strategy, the term multi-benefit	Concur. A note was added to the sidebar in Section 1.2 on the “Central Valley Protection Plan Goals” that states “these goals are as adopted by the Central Valley Flood Protection Board in 2012 (DWR, 2012)”. The term “multi-benefit projects” has been revised as defined in the sidebar on page 2-8. The 2017 CVFPP Update was reviewed for any inconsistent use of the term multi-benefit and language was revised accordingly.	Yes

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			seems to mean the same thing as the “co-equal goals” term used in the Delta Plan. If DWR elects to keep the term “multi-benefit” rather than replacing it with IWM, the report should be reviewed and edited to make sure the term is used consistently.		
L_COL2-20	Glenn Gebhardt	City of Lathrop	P. 1-10, 9th bullet: Reclamation Districts 404 and 17 are not “rural”.	The text has been revised to say, “Six critical levee repairs (e.g., seepage repairs at Reclamation Districts 404 and 17).”	Yes
L_COL2-21	Glenn Gebhardt	City of Lathrop	P. 2-15, Table 2-2: Economic stability outcomes and associated metrics don’t address the factors such as poverty, low incomes, blight, and lack of development investment, that also contribute to the Disadvantaged Community (DAG) criteria used in DWR’s cost sharing guidelines. In order to achieve and/or maintain economic stability, a level of flood protection needs to be achieved and sustained to eliminate these stressors.	Table 2-1 is not intended to be a comprehensive set of performance tracking metrics, but instead includes representative examples. These performance tracking metrics are intended to track long-term progress towards achieving CVFPP goals. Since many different factors affect the poverty-related metrics proposed, they would not provide a direct indicator of the value from flood investments.	No
L_COL2-22	Glenn Gebhardt	City of Lathrop	P. 2-17 and 2-18, Tables 2-3 and 2-4: These tables are very difficult to interpret if one is not the author. For instance, the titles of the DWR programs “Flood Management Planning” and “Floodplain Risk Management” are very similar, so an outsider would not know the difference. And the logic behind the ratings is not self-evident, nor is the significance of each rating. In fact, we are not sure what the tables are intended to demonstrate.	While the DWR flood management programs are not described prior to Page 2-16, they are described in greater detail in Chapter 4 (Section 4.3). Table 2-3 highlights the importance of each of the policy issues in that they each affect many DWR flood management programs. Table 2-4 highlights how each of the CVFPP supporting efforts have played a unique role in informing these policy issues.	No
L_COL2-23	Glenn Gebhardt	City of Lathrop	P. 2-24, Section 2.3.2: “Perspectives on Multi-benefit Projects” is written using the perspective that multi-benefit is synonymous with ecosystem enhancement. The text needs to be consistent with the Section 1.2 “Key Concepts” sidebar, with particular focus on yielding water supply benefits, a critical need highlighted by the recent 5-year drought.	Please see response to comment L_COL2-19.	No
L_COL2-24	Glenn Gebhardt	City of Lathrop	P. 3-5, Table 3-2, “Systemwide: Reservoir Storage and Operations”: The San Joaquin BWFS technical evaluations showed that climate change will increase the 200-year flood peak at Vernalis from 125kcfs today to 339kcfs in the year 2064, and the only measure that makes a significant contribution to addressing this nearly 3x increase is a combination of 200TAF of new storage on the Merced River and 200TAF on the Tuolumne River. This should be included in the 2017 SSIA.	The 330,000 cfs peak flow at Vernalis cited from the San Joaquin River BWFS assumed hydrologic routing. This flow rate assumes floodwaters would be contained by infinite levees, which does not represent real-world scenarios because floodwaters would overtop or breach levees upstream. Hydrologic routing was applied for the purposes of evaluating and screening reservoir management options. The additional 200 TAF of new storage on the Merced River and 200 TAF on the Tuolumne River was not included in the San Joaquin BWFS Recommended Plan and therefore was not included in the 2017 CVFPP SSIA Portfolio. It should be noted that Wild and Scenic River Act makes new reservoirs or reservoir expansion difficult to implement on the Tuolumne River and Merced River.	No
L_COL2-25	Glenn Gebhardt	City of Lathrop	P. 3-8, Map 3-2: Since both Lathrop and Manteca are “urban”, they should be shown on the map in cross-hatched pattern.	Concur. The map was revised to account for the developed areas of Lathrop and Manteca as urban.	Yes
L_COL2-26	Glenn Gebhardt	City of Lathrop	P. 3-8 and 3-9, Maps 3-1 and 3-2: The “Number of Capital Investment Actions” is not very descriptive. For instance, is there any standardization for what “7 levee improvements” in the Lower San Joaquin and Delta South Region means? Does this represent 7 relatively standard-sized increments that can be compared to the 2 in the Upper San Joaquin Region? The inference is that the Lower SJ region has 3.5 times the levee improvements than the Upper SJ Region, but if compared based on recommended investment, the difference would be far greater. Defined and standardized common bases for comparison should be developed in order to report consistent information.	The number of capital investment actions represents the number of individual projects. Large projects and small projects are all counted as one capital investment action. It should be noted that using standard-sized increments would be misrepresentative because some small reaches of levees need extensive improvements and some long reaches of levees require only minimal improvements.	No
L_COL2-27	Glenn Gebhardt	City of Lathrop	P. 3-10, Figure 3-3: Some of the ratings are difficult to understand, for instance, the Paradise Cut expansion would divert an additional 10,000 cfs from the lower San Joaquin River, which is a minor fraction of the 200yr flood increase due to climate change, so how does that earn such a high rating for public safety?	The peak flow at Vernalis for the 2067 without-project condition for the 0.5% chance event is approximately 112,200 cfs. Diversion of an additional 10,000 cfs is not an insignificant amount, especially considering the urban areas in deep floodplains that it would protect.	No
L_COL2-28	Glenn Gebhardt	City of Lathrop	P. 3-12, Section 3.1.2: The Yolo Bypass multi-benefit discussion does not conform to the Integrated Water Management definition of multi-benefit introduced in the Section 1.2 “Key Concepts” sidebar. This is also an issue for the Upper Elkhorn case study and Paradise Cut example. In all of these cases, the supporting goal of “promote ecosystem functions” is met, but not “promote multi-benefit projects”.	The description for Yolo Bypass improvements, Upper Elkhorn case study, and Paradise Cut improvements all conform to the definition of multi-benefit projects described in Page 2-8.	No
L_COL2-29	Glenn Gebhardt	City of Lathrop	P. 3-18, “Paradise Cut Multi-benefit Improvements: what is the total cost and what are the improvements/cost for the next 5 years?	The total cost of the Paradise Cut improvements was estimated at \$280-340 million. The first increment of investment is \$30 million for land acquisition in the first phase, which could occur within the next 10 years.	No
L_COL2-30	Glenn Gebhardt	City of Lathrop	P. 3-20, Section 3.1.2: “Reservoir Management Actions” for the San Joaquin basin describes moving stored water to a groundwater bank and using the freed-up reservoir space to meet the primary goal of improving flood risk management. But while moving the stored surface water to groundwater storage may avoid reduction in water supply yield, it would not enhance it. So in our view this does not meet the supporting goal to promote multi-benefit projects, it merely mitigates against loss of water supply. Multi-benefit credit should only go to storage actions which improve water supply yield.	Concur. No change to document. Water supply benefit is not stated in this section.	No
L_COL2-30	Glenn Gebhardt	City of Lathrop	P. 3-20, Section 3.1.2: “Reservoir Management Actions” for the San Joaquin basin describes moving stored water to a groundwater bank and using the freed-up reservoir space to meet the primary goal of improving flood risk management. But while moving the stored surface water to groundwater storage may avoid reduction in water supply yield, it would not enhance it. So in our view this does not meet the supporting goal to promote multi-benefit projects, it merely mitigates against loss of water supply. Multi-benefit credit should only go to storage actions which improve water supply yield.	Concur. No change to document. Water supply benefit is not stated in this section.	No

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L_COL2-31	Glenn Gebhardt	City of Lathrop	P. 3-30 and 3-31, Maps 3-6 and 3-7: The “Number of Management Actions” is not very descriptive. For instance, is there any standardization for what “116 public safety” actions in the Lower San Joaquin and Delta South Region means? Does this represent relatively standard-sized increments that can be compared to the 102 in the Upper San Joaquin Region? The inference is that efforts will be roughly equal in the two regions, yet the population protected in the Lower San Joaquin and Delta South region is far greater. Defined and standardized common bases for comparison should be developed in order to report consistent information.	The number of capital investment actions represents the number of individual projects. Large projects and small projects are all counted as one capital investment action. It should be noted that using standard-sized increments would be misrepresentative because some small reaches of levees need extensive improvements and some long reaches of levees require only minimal improvements.	No
L_COL2-32	Glenn Gebhardt	City of Lathrop	P. 3-33, “2017 Without Project Scenario”: We agree that the Recommended Plan in the draft USACE Lower San Joaquin River Feasibility Study should not be considered a without project condition. However, the San Joaquin River BWFS takes a conflicting position.	The CVFPP and the two Basin-wide Feasibility Studies have different without-project conditions because the two documents have different purposes. The Sacramento and San Joaquin BWFS’s are primarily focused on refining the larger-scale actions in their respective basins. Urban improvements were included in the future, without-project condition for both BWFS’s. The 2017 CVFPP Update updates and refines the overall near-and log-term investment needs established in the 2012 CVFPP for all scales of actions.	No
L_COL2-33	Glenn Gebhardt	City of Lathrop	P. 3-39, Map 3-9: The flows at Vernalis do not agree with the BWFS. For instance, the BWFS lists the 0.5% flows at 125kcfs and 339kcfs for current and 2064, respectively, for without project conditions, versus 86kcfs and 112kcfs shown on Map 3-9. This is a substantial difference. Also, the stage figures at Vernalis are not very useful because of the dampening effect of substantial overbank flows at that location. It would be more useful to show the flows and stages at Mossdale and Howard Rd.	See comment response to L_COL2-24 regarding differences in flows at Vernalis between the 2017 CVFPP and the San Joaquin BWFS.	No
L_COL2-34	Glenn Gebhardt	City of Lathrop	P. 3-41, Section 3.2.1 “Improved Land Use and Floodplain Management”: The policy statement reads, in part that “Urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety risks are held constant or reduced over time... “. But, Figure 3-8 shows that life loss increases over time for the Sacramento River Basin. We’d suggest that the policy language be modified to “Urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety risks are held constant or reduced compared to 2017 Without-project conditions.”	Increases in the life risk with 2017 refined SSIA Portfolio in the Sacramento River Basin is due in part to climate change and population growth in already urban areas, including infill development. The policy described on Page 3-41 is specific to discouraging growth in rural, deep floodplains.	No
L_COL2-35	Glenn Gebhardt	City of Lathrop	P. 3-41, Section 3.2.3: The 2nd paragraph says “Current regulatory practices hinder the ability to recognize and obtain credit for benefits of improvements made early in a long-term program in order to offset impacts that may occur later in the program.” This should be revised to “Current regulatory and funding practices hinder the ability to recognize and obtain credit for benefits of Improvements made early in a long-term program in order to offset impacts that may occur later in the program.” DWR grant funding guidelines currently require each project to yield multi-benefits and ecosystem enhancements, and there is no mechanism to apply credit from other projects in a program. The CVFPP should also direct and/or recommend that DWR update grant funding guidelines to be consistent with the CVFPP and revised to recognize multi-benefits and ecosystem enhancements on a programmatic scale in the same manner suggested for permitting baselines.	The specific context of Section 3.2.3 is implementation of structural systemwide projects like the Yolo Bypass expansion, in which large-scale improvements must be implemented in multiple phases. It does not apply to individual, independent projects within a region. DWR does not require each project to yield multiple benefits. However, projects with multiple benefits, in general are preferred over single-purpose projects because of the increased benefits they provide. Grant funding guidelines are developed consistent with the goals and requirements of each flood management program.	No
L_COL2-36	Glenn Gebhardt	City of Lathrop	P. 3-42 Section 3.2A “Operations and Maintenance of the Flood System”: This section should also mention the need to assign O&M responsibility for the channel of the Paradise Cut bypass, as it is currently a gap. Similarly, the section should highlight the need to assign O&M responsibility for the natural river channels, so that the design capacities and profiles can be maintained.	Uncertainties regarding authorities and responsibilities in the San Joaquin basin are flagged as an issue in the <i>Draft Flood System Long-Term Operation, Maintenance, Repair, Replacement and Rehabilitation (OMRR&R) Cost Evaluation Technical Memorandum</i> , which is a supporting document to the 2017 CVFPP Update.	No
L_COL2-37	Glenn Gebhardt	City of Lathrop	P. 3-44, Section 3.2.5 “Development of Multi-benefit Projects”: The first paragraph says multi-benefit projects increase access to funding resources, and the second paragraph says multi-benefit projects are hindered by limited financial resources. These are conflicting statements.	Concur. Some of the current funding mechanisms can sometimes hinder the implementation of multi-benefit projects. One example is that Prop 1E bond funding cannot be spent on ecosystem restoration that is not considered mitigation of flood management projects. However, these types of projects could attract or take advantage of other funding mechanisms which can be used for other purposes, such as flood, water supply, recreation, and ecosystem restoration. Text was revised to the following: "A multi-benefit approach more efficiently and effectively leverages flood infrastructure to achieve a broader array of public benefits and may potentially increase access to more funding sources. However, many policy and institutional barriers hinder the implementation of multi-benefit actions. Limited financial resources currently exist to support the development of flood management projects, even those with multi-benefit features."	Yes
L_COL2-38	Glenn Gebhardt	City of Lathrop	P. 4-5, Section 4.1.3: Capital costs should be qualified for what they do and don’t cover, and a note should be included to highlight that local agencies may have additional cost obligations for their other facilities. It appears that non-SPFC ecosystem and multi-benefit feature costs may have been added, but it is unclear whether non-SPFC levee costs have been included.	Capital costs included in Table 4-2 are for the management actions included in the State Systemwide Investment Approach (SSIA) specified in Table 3-2. Non-SPFC ecosystem and multi-benefit features are not included. It is acknowledged that local agencies have other ongoing and capital obligations.	No
L_COL2-39	Glenn Gebhardt	City of Lathrop	P. 4-4, footnote 1: San Joaquin County has not passed an assessment since 2012. SJAFCA, RD 1614, and RD 828 passed one in 2013, although SJAFCA is not an LMA.	Concur. Revised to: “LMA passing assessments since 2012 include RD 784, RD 999, RD 900, RD 1001, RD 10, RD 2103, RD 536, RD 1614 and RD 828.” TRLIA was removed because, like SJAFCA, it is not a LMA.	Yes

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L_COL2-40	Glenn Gebhardt	City of Lathrop	P. 4-30, “Recommendations for Land Use and Floodplain Management”, 2nct bullet: The State should not take administrative actions just “to ensure consistency of State floodplain management policies with federal policies”. State and local land use policies have been developed to accommodate a wide range of factors, which force a balancing of priorities.	Concur. Recommendation was deleted.	Yes
L_COL2-41	Glenn Gebhardt	City of Lathrop	P. 4-33, “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”: This policy should be broadened to seek recognition of programmatic gains in life safety, property damage, ecosystem uplift, and integrated water management, so that individual projects are not conditioned to achieve these goals. Programmatic crediting should be applicable to both regulatory and funding decisions and actions.	A footnote was added to page 4-34 that states: “Although establishing hydraulic and ecosystem baselines will be the initial focus, baselines for other benefits and impacts (such as flood damages, life loss, water supply, and others) may also be considered.”	Yes
L_COL2-42	Glenn Gebhardt	City of Lathrop	P. 4-34, “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”: Last bullet should also call for tracking land subsidence over time.	Concur. The text page 4-34 has been revised to say: “Track and report changes in hydrologic and sea level rise conditions, and subsidence over time through updates to the Flood System Status Report”If subsidence continues at current rates, it is expected to have major impacts on the flood system, especially in the San Joaquin Basin. The climate change and subsidence information collected will help support future updates of the CVFPP and land use and residual risk management recommendations.”	Yes
L_COL2-43	Glenn Gebhardt	City of Lathrop	P. 4-34, “Recommendations for Operations and Maintenance of the Flood System”: This policy needs to also include a bullet for establishing responsibility for maintenance of the Paradise Cut channel and natural river channels of the SPFC so that hydraulic design performance (currently 1955 and 1957 profiles) can be maintained.	33 CFR 208.10 provides that the channels of the federal flood project will be maintained. Water Code 12642 states “[i]n all cases where the Federal Government does not maintain and operate projects, it is the responsibility and duty of the county, city, state agency, or public district affected to maintain and operate flood control and other works, constructed pursuant to Chapters 1 and 2 of this part, after their completion and hold and save the State and the United States free from damages.” This provision applies to Paradise Cut and the rest of the San Joaquin system. In the area of Paradise Cut, Reclamations Districts 2058, 2062, 2107, 2095 and 2089 all signed assurances to the Reclamation Board to maintain the Lower San Joaquin River and Tributaries Project of flood control for the San Joaquin River, which includes the channel of Paradise Cut. Supplements to the Standard Operation and Maintenance Manual (Unit Numbers 8, 9 and 10) outline the channel responsibilities of Paradise Cut.	No
L_COL2-44	Glenn Gebhardt	City of Lathrop	P. 4-35, “Recommendations for Development of Multi-benefit Projects”: This should be modified to reflect a goal for multi-benefit programs, not projects, consistent with the “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”.	See response to Comment L_COL2-35.	No
L_COL2-45	Glenn Gebhardt	City of Lathrop	P. 4-35, “Recommendations for Development of Multi-benefit Projects”: Most of the bulleted recommended actions are written to address the goal of Promote Ecosystem Functions, which is a different supporting goal of the CVFPP, as described in Section 1.2. The action list should focus on integrated water management, which are highlighted in the final 2 bullets of in the list.	Please see response to Comment L_COL2-19. This is consistent with the multi-benefits definition described on Page 2-8.	No
L_COL2-46	Glenn Gebhardt	City of Lathrop	P. 4-20, Figure 4-10 “Ten-year Recommended Funding Actions for CVFPP”: This graphic and the associated discussion lacks sufficient detail describing the near-term actions needed to support the assessment of viability of the proposed new funding mechanisms including the Sac/SJ Drainage District, River Basin Assessment and State Flood Insurance Program. More discussion of the specific near-term actions describing the assessment of the viability and evaluation of these mechanisms as well as the process for receiving stakeholder input is needed. The State should receive comment and finalize the supporting CVFPP Investment Strategy technical memorandum and its recommendations and incorporate the recommended near term actions into the CVFPP.	DWR and the CVFPB will work together with stakeholders to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be explored through a transparent and collaborative committee/workgroup process. The State intends to provide detail, where available, on the near-term actions in the Final-Draft CVFPP Investment Strategy and post 2017 CVFPP Update adoption.	No
L_COL2-47	Glenn Gebhardt	City of Lathrop	P. 4-40, “Recommendations for Funding”: a. Under Recommended Actions, 1st Bullet - Suggest revising the text as follows: “Continue to closely coordinate with State and Local agencies, to generate State funding and support for CVFPP’s flood investments.” The State has recognized already that the new funding sources, in particular the proposed reutilized SSJDD and River Basin Assessments, are effectively additional dollars from the direct local beneficiaries of the CVFPP. Therefore, there must be close coordination with those stakeholders; b. Second sub-bullet: - Suggest revising the text as follows: “Evaluate the viability and effectiveness to Reutilize the Sacramento and San Joaquin Drainage District (S/L). The Sacramento and San Joaquin Drainage District is currently in the Water Code to fund capital projects. It has been nearly 80 years since this district generated funds. In the immediate near-term (next 1 to 2 years), the viability of the district to conduct assessments should be evaluated by DWR. A thorough evaluation that involves local stakeholder input and covers topics such as benefit, economics, capacity and legal constraints should be completed. This analysis should conclude what, if any, level of assessment is viable and what legislative changes are necessary to allow revenue generated to be used for O&M and capital projects. The CVFPP funding plan assumes \$26M/year potential revenue could be generated from this mechanism beginning in approximately 2020.” The CVFPP should provide more specific near-term recommendations and address the next steps consistent with the conclusion of Investment Strategy Technical memorandum. Further, because of the delay of the Investment Strategy Memorandum’s release, the Final CVFPP should be released only after comments and updates to the Investment Strategy memorandum are received and finalized respectively. c. Third sub-bullet: - Suggest revising the text as follows: “Evaluate the viability and effectiveness to establish a State river basin assessment (S). IWM is the focus of this type of assessment, and the State should develop a watershed	Concur. Document was revised to incorporate the following language. “Evaluate the viability and effectiveness of reutilizing the Sacramento and San Joaquin Drainage District (S/L). The Sacramento and San Joaquin Drainage District is currently in the California Water Code to fund capital projects. It has been nearly 80 years since this district generated revenue. In the immediate near-term (next 1 to 2 years), DWR should evaluate the viability of the district to conduct assessments. The evaluation should involve local stakeholder input and cover topics such as benefits, funding capacity and legal constraints. This analysis should conclude what level of assessment is viable and what legislative changes may be necessary to allow generated revenue to be used for capital and ongoing investments.”	Yes

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			<p>approach to managing and funding projects. For example, a river basin assessment would return money to the watershed, to be shared across the IWM activities which would include management actions reflect in the CVFPP. The DWR should develop criteria, in coordination with local stakeholders, for the evaluation of the viability and effectiveness of this potential funding mechanism to meet the needs of the CVFPP funding plan that assumes \$5M/year potential revenue from this mechanism beginning in Phase 2.” Similarly, as noted above, the CVFPP should provide more specific near-term recommendations and address the next steps consistent with the conclusion of Investment Strategy Technical memorandum.</p> <p>d. Fourth sub-bullet: - Suggest revising the text as follows: “Evaluate the viability and effectiveness to establish a State flood insurance program (S). Following the evaluation of the statewide flood insurance as described in the floodplain and land use management recommendations, a new approach to insurance could potentially generate funds to reduce flood risk while providing the same level of financial protection as offered by the NFIP. The CVFPP funding plan assumes that \$15M/year of potential revenue from this mechanism could begin in Phase 2. A state flood insurance program could use a portion of the premiums to reduce flood risk by contributing funds for flood management system repairs, improvements, and flood risk mapping and notification. Another version of this could be a local basin-wide insurance program. This could potentially be a companion program with a Statewide Flood Insurance Program. Any new program should also consider insurance for agricultural properties. All of these potential uses of funds from a State insurance program would need to be further evaluated. Criteria for the evaluation should be developed in close collaboration with the impacted stakeholders.</p> <p>General, Sediment Dynamics in the San Joaquin River: This significant issue is not acknowledged in the Draft 2017 CVFPP Update. We recommend that the document both acknowledge the issue and express the intent to carry out a basin-scale investigation to address information gaps and apply the resulting understanding to the refinement of the CVFPP in the 2022 Update.</p> <p>e. Because of the delay of the Investment Strategy Memorandum’s release, the Final CVFPP should be released only after comments and updates to the Investment Strategy memorandum are received and finalized respectively.</p>		
L_COL2-48	Glenn Gebhardt	City of Lathrop	General: The spending and funding plans are very ambitious, and it is probable that it will not be possible to implement all of the funding mechanisms to achieve all of the plan goals and features. As currently written, the plan is not clear on how the state will prioritize actions and spending in each Phase. It is our view that actions which address the primary goal of the plan (Improve Flood Risk Management) should be the first priority for spending, and that spending to accomplish supporting goals should be secondary. At present, state funding for critical public safety improvements is conditioned on accomplishing supporting goals on a project by. project basis.	The State has prioritized investments to reduce the highest flood risk to the largest number of people for Phase 1. The CVFPP has provided a programmatic and systematic approach to implementation of improvements versus a project-by-project advocacy process.	No
L_COL2-49	Glenn Gebhardt	City of Lathrop	General: We have not yet completed our review of the Draft CVFPP Technical Analyses Summary Report and the 2017 Draft Central Valley Flood Protection Plan Investment Strategy Technical Memorandum, as those documents were released much later.	Comment noted.	No
L_RD171-01	Dante Nomellini	Reclamation District 17	<p>The Plan was represented to be for the purpose of establishing a high level view of a future path to provide flood protection of the Central Valley. Although the Plan does set forth the magnitude of the challenge both physically and in terms of potential cost it misses the mark in setting forth an achievable path forward.</p> <p>The effort to restrict land use through withholding flood risk reduction assistance and the imposition of the burden to achieve benefits other than for flood control are unwise impediments to achieving urgently needed increased flood protection for existing populations, critical infrastructure and billions of dollars of public and private investment.</p>	See response to Comment L_COL2-14.	No
L_RD171-02	Dante Nomellini	Reclamation District 17	<p>LAND USE - RISK AND LIABILITY</p> <p>The State Plan of Flood Control (SPFC) is comprised of a regulatory program and physical works including Project levees, channels, bypasses, flood storage reservations and other features.</p> <p>The regulatory program has included the establishment of floodways and bypasses with the acquisition of flowage easements, restrictions on the elevation of levees in floodways and bypasses, and restrictions on encroachments. Flood routing was intended to move floodwaters safely through the watersheds and into the Bays. The regulatory process had some slippage and unleveed areas planned to remain as floodplain or part of flood control projects were allowed to be leveed and developed. This slippage and other actions of the State have added to the flood risk particularly to downstream areas. State liability will surely follow the shift of the flood burden onto others rather than make reasonable efforts to help protect all impacted parties.</p> <p>The SPFC physical works are in great part Project levees and channels designed and constructed by the USACE with financial contribution from the State and LMAs. The Lower San Joaquin River and Tributaries Project, of which the Lower San Joaquin River Levee Project is a unit, was authorized by the Flood Control Act of 22 December 1944, Public Law 534, 78th Congress, 2nd Session, Section 10. Included in the Project were the RD 17 levees along the left bank of French Camp Slough, those along the right bank of the San Joaquin River and those along the right bank of Walthall Slough. Commencing in 1944, work on various portions of the RD 17 levees was carried out by the U.S.</p>	Comment noted.	No

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			<p>Army Corps of Engineers. The Standard Operation and Maintenance Manual for the Lower San Joaquin River Levees Project (prepared by the Sacramento District Corps of Engineers, U. S. Army, Sacramento, California, dated April, 1959) provides that the project includes construction or reconstruction of levees, channel improvement and the provision for bank protection along the Lower San Joaquin River from the mouth of the Merced River to the Delta, terminating at the Stockton Deep Water Ship Channel.</p> <p>“I.04. Protection Provided. The Lower San Joaquin River and Tributaries Project, including the levee and channel work of the Lower San Joaquin River Levees Project, when completed, will provide protection from all floods of record to about 120,000 acres of fertile agricultural lands; to a suburban area south of the City of Stockton and about four small communities; to other areas developed for residential and industrial purposes; to two transcontinental highways and other State and County highways. It will make possible the reclamation of areas that can be developed to a higher degree when protection against flood hazard is assured.” (Emphasis added.)</p> <p>In May 1963, the U. S. Army Corps of Engineers issued “Supplement to Standard Operation and Maintenance Manual Lower San Joaquin River and Tributaries Project “Unit No. 2 Right Bank Levee of San Joaquin River and Left Bank of French Camp Slough within Reclamation District No. 17.”</p> <p>“I.03. Protection Provided. Levees along the left bank of French Camp Slough and right bank of San Joaquin River, as described in this unit, provide direct protection to about 12,000 acres of agricultural, industrial and residential lands within Reclamation District No. 17. Along French Camp Slough the grade of the adopted flood plain profile is level at elevation 11.0 from the San Joaquin River to the French Camp Turnpike. Along the right bank of the San Joaquin River, the grade of the adopted flood plain profile varies from elevation 11.0 at French Camp Slough to elevation 23.5 at Walthall Slough. All elevations are referred to mean seal level datum (1929) adjustment. Levee grades within this unit provide for a freeboard of at least 3 feet above the adopted flood plain profile. Within this unit, the project design flood for French Camp Slough is 3,000 cubic feet per second and for the San Joaquin River about 18,000 cubic feet per second from French Camp Slough to Old River and 37,000 cubic feet per second from Old River to Walthall. The flow in French Camp slough coincidental with the San Joaquin River design flood would be about 2,000 cubic feet per second.” (Emphasis added.)</p> <p>The supplement references work on the RD 17 levees commencing in January of 1944 and extending through January 1963.</p> <p>On January 3, 1963, The Reclamation Board of the State of California as the State Sponsor of the Project accepted for Operation and Maintenance the bank protection., levee enlargement, and access and patrol road construction, right and left banks, San Joaquin River from Head Old River to Stockton Deep Water Channel and other work.</p> <p>The clear purpose of the Lower San Joaquin Levees Project was to promote development for agricultural, industrial and residential purposes. Such purpose was in furtherance of the intent of the conveyance of swamp and overflowed lands from the United States to the State and in turn to private ownership.</p> <p>In 1850 Congress adopted the Arkansas Act of 1850 sometimes referred to as the Swamp Land Act of 1850 to aid the States in reclaiming swamp and overflowed lands. By way of such Act, such lands were conveyed to the State of California in consideration of the duty of the State to make and maintain the necessary improvements for such reclamation. In the case of Kimball v. Reclamation Fund Commissioners (1873) 45 Ca/.344, 360 the California Supreme Court found:</p> <p>“The object of the Federal Government in making this munificent donation to the several States was to promote the speedy reclamation of the lands and thus invite to them population and settlement, thereby opening new fields for industry and increasing the general prosperity.” (Emphasis added.)</p> <p>The area along the San Joaquin River in RD 17 consists of swamp and overflowed land conveyed pursuant to the 1850 Act to the State for reclamation and development. Reclamation and development certainly commenced shortly after 1850. Reclamation District No. 17, one of the oldest reclamation districts in California was formed in 1863 and the levees along the San Joaquin River have been in place for more than 100 years. The land along the river is not undeveloped but consists of highly developed farmland, multiple residences and some commercial structures dating back to the 1800’s. It is not by any stretch of the imagination a natural wetland or flood plain and has not been such for more than 100 years.</p> <p>During the period of about 1988-1990 in connection with the permitting of the Weston Ranch residential development in the City of Stockton, the levees of RD 17 were improved to meet the FEMA requirements for urban development. FEMA accreditation was issued on February 2, 1990. The work necessary to bring the levee system up to the FEMA standards was approved by all regulatory agencies including the State Reclamation and Corps of Engineers. Application for such work was submitted by RD 17 to the Corps on or about June 12, 1988. The work included clearing, placement of engineered fill, utility relocation, placement of gravel patrol road and placement of bank protection. The application was supported by EIR Sch #87020305 certified by the City of Stockton on January 25, 1988, hydraulic study by Gil and Pulver and a formal Endangered Species Consultation. The impacts of removal of the RD 17 area from the FEMA floodplain restrictions were addressed in the EIR and hydraulic study. In</p>		

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			<p>about June of 1989, the Corps issued its Permit No. 9957 for the work determined by them as requiring such a permit. A similar application submitted to The Reclamation Board of the State of California resulted in their approval. Additionally, The Reclamation Board performed ongoing inspection and certification of the work.</p> <p>It is now apparent that the SPFC Project levees were not constructed to protect against all floods of record prior to 1944 including the floods of 1849-50, 1852-53, 1861-62 and 1866-67.</p>		
L_RD171-03	Dante Nomellini	Reclamation District 17	<p>Billions of dollars of public and private investments have been made and more than 46,000 people have located in RD 17 in reliance upon the State Plan of Flood Control System including Project levees.</p> <p>The CVFPP 2017 update appears to obstruct rather than facilitate increased flood protection for the RD 17 area in total disregard of the inadequacies of the SPFC Project levees and other failures of the SPFC. SB 5 was not intended to preclude development in areas protected by levees but rather to require that specific types of development be provided with 200 year protection by the year 2025. State assistance was contemplated in achieving such protection. To use the CVFPP 2017 update to restrict development which the CVFPP Project levees and Arkansas act of 1850 were intended to promote is inappropriate. The local land use agencies do not plan for much if not all of the development for which Plan seeks to preclude. The Delta Stewardship Plan imposes restrictions which even if not enforceable create a disincentive for development in the area of concern. The effort to obstruct rather than facilitate improvements of the Project levees certainly does not reduce State liability exposure and increases flood risk.</p>	See response to Comment L_COL2-14.	No
L_RD171-04	Dante Nomellini	Reclamation District 17	<p>IMPOSING SETBACKS IN ALL RD 17 OPTIONS IN THE BASIN-WIDE FEASIBILITY STUDY REFLECTS A DELIBERATE ATTEMPT TO BIAS SUBSEQUENT CONSIDERATION OF ALTERNAITVES, IS PRE-DECISIONAL AND IS EVIDENCE OF SERIOUS WRONGDOING</p> <p>Each of the RD 17 options in the Basin-Wide Feasibility Study San Joaquin Basin dated March 2017 imposes a levee setback at the confluence of the San Joaquin and Old River. {Pages 5-11} Inclusion in every option is a clear attempt to bias consideration against a fix in place · with no set back alternative. The location of the imposed setback is critical to maintaining the historical flow split between the San Joaquin and Old River. More flood flow down the San Joaquin will increase flood risk to downstream areas including portions of the City of Stockton including the Regional Wastewater Treatment Facility and the Port of Stockton. The risk of causing changes in the flow split creates liability exposure which only the State could endure. The setback would as to the included lands reverse the reclamation intended by the Arkansas Act of 1850 and the Flood control Act of 1944. Maintenance of the Project levees in the present location is contractually mandated between the United States and the State and between the State and RD 17. Sizable investments have been made in the present Project levee first by landowners, then by RD 17 with assessments from landowners, and then by the United States, State and RD 17 in constructing and repairing the SPFC Project improvements.</p> <p>The assumption that a setback levee and expansion of the floodplain adds multi-benefits is not supportable in this case. Moving a levee off of the foundation which has been consolidating for over 100 years introduces the risk of instability which could take years to correct. Detrimental changes to the hydraulics in the river including the flow split, velocity, scour and sedimentation and to flood routing have not been analyzed. Sedimentation could significantly affect channel capacity and even induce meandering. In the current regulatory environment maintenance of channel capacity is difficult if not impossible. Water quality impacts including methylation of Mercury and propagation of mycrocistis or other toxins in the newly created flood plain could adversely impact aquatic species and even humans.</p> <p>The direction of floodwaters into areas near development or critical structures as included in the options for RD 17 increases the risk to such areas. The RD 17 area has a high water table and seepage into adjoining residential development can occur by way of through seepage, under seepage or by pressurization of the aquifer. Wind generated waves across the flooded setback area are also a problem to be addressed. Stranding and increased predation of protected fish species is a huge problem. The predation is not only by other fish species but by numerous bird species including white pelicans, cormorants, egrets, herons, gulls and king fishers and by other species such as river otters, raccoons, mink and sea lions. Flooding of the setback area will drown or damage the habitat for terrestrial species including riparian brush rabbits. Human health and safety impacts from disease bearing vectors such as mosquitoes and the chemical control of the same are particularly significant near developed areas and other areas substantial human activity. The spreading of contaminants from the flooded setback area and from the flooding of upstream wastewater pipe systems and treatment facilities and hazardous material sites.</p>	Please see the response to comment L_COST1-09.	No
L_RD171-05	Dante Nomellini	Reclamation District 17	<p>CONSIDERATION OF SETBACK LEVEES AND EXPANSION OF THE FLOOD PLAIN SHOULD BE LOCATION SPECIFIC AND BENEFITS SHOULD NOT BE ASSUMED OR DETERMINED WITHOUT CAREFUL ANALYSIS</p> <p>Recommendation of levee setbacks and expanding the flood plain should only be done with careful consideration of the particular location. Benefits and detriments will change dramatically depending on location. Adding to the concerns discussed above, in the lower Delta increased salinity intrusion can result from increasing the tidal prism and or shortening the path to the export pumping facilities. For large setbacks and expansion of floodplains the</p>	DWR agrees that the benefits and impacts of setback levees are highly specific to their location. The CVFPP is programmatic level planning document and is not a decisional document. As such, any proposed projects discussed in the 2017 CVFPP Update will need further study and analysis at project level.	No

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			increased evaporative losses could be significant. Setbacks and expansion of the floodplain would appear to be best placed away from development in areas where the water table is lower and groundwater recharge can be a real benefit.		
L_RD171-06	Dante Nomellini	Reclamation District 17	<p>UNTIL A MINIMUM ACCEPTABLE LEVEL OF FLOOD PROTECTION IS ACHIEVED FOR ALL EXISTING FLOOD CONTROL LEVEES AND SYSTEMS THE OBJECTIVE TO ACHIEVE MULTIPLE BENEFITS SHOULD BE SECONDARY IN THE APPLICATION OF FLOOD CONTROL FUNDS</p> <p>There are multiple sources of funds for habitat, fish and wildlife, recreation and water development which don’t include a required flood control benefit and should be the first source of funding. There are of course situations where multiple sources of funding can be pooled to fund a multipurpose project such as a dam where water conservation is funded by the water and power contractors and the flood control features funded by the general public. There should not be any requirement to force other benefits into every flood control project. In many cases this adds greatly to the costs and time for design and permitting. In many cases there is greater benefit from separate and distinct projects. Wildlife habitat is sometimes best if provided in a single fairly large location which can be controlled and managed rather than in a series of scattered relatively small locations. In many cases existing in channel habitat is being ignored and the opportunity to improve such habitat rather than create a conflicting imposition on flood control facilities is being overlooked. Such is the case in the lower San Joaquin River and in the Delta where there are numerous berms, channel islands and even flooded islands.</p>	<p>The State’s emphasis on multi-benefit projects is not an attempt to “force other benefits into every flood control project.” Instead, the State strongly supports and encourages the planning and implementation of projects that provide multiple benefits. This is because this approach can leverage flood infrastructure more efficiently and effectively to achieve a broader array of public benefits.</p>	No
L_RD171-07	Dante Nomellini	Reclamation District 17	<p>MAINTENANCE OF CHANNEL CAPACITY HAS NOT BEEN ADEQUATELY CONSIDERED</p> <p>A significant part of the SPFC has been ignored. The USACE design and construction of the Project facilities on the San Joaquin River included consideration of channel capacity. The State provided assurances to the USACE as to operation and maintenance yet it does not appear that anything has been done to maintain channel capacity. A prime example is Paradise Cut which is part of the SPFC and yet it does not carry the design flow and the channel capacity has not been maintained. Channel capacity is a critical factor in moving floodwater safely to the Bay and the importance of location of levees, location of setbacks and the lack channel capacity maintenance is not adequately addressed in the Plan. There was commercial mining of sand from the San River in the Mossdale area and perhaps in other portions of the San Joaquin River, until more recent times, and it may have been assumed that such would be allowed to continue and help maintain channel capacity. The Plan reflects a disconnect with the SPFC which it is updating. The Plan should address channel capacity, the maintenance thereof and the entity responsible for the same. Permitting and funding should also be addressed.</p>	<p>Water Code 12642 states “In all cases where the Federal Government does not maintain and operate projects, it is the responsibility and duty of the county, city, state agency, or public district affected to maintain and operate flood control and other works, constructed pursuant to Chapters 1 and 2 of this part, after their completion and hold and save the State and the United States free from damages.” This provision applies to Paradise Cut and the rest of the San Joaquin system. In the area of Paradise Cut, Reclamations Districts 2058, 2062, 2107, 2095 and 2089 all signed assurances to the Reclamation Board to maintain the Lower San Joaquin River and Tributaries Project of flood control for the San Joaquin River, which includes the channel of Paradise Cut. Supplements to the Standard Operation and Maintenance Manual (Unit Numbers 8, 9 and 10) outline the channel responsibilities of Paradise Cut.</p> <p>In addition, the Water Resources Law of 1945 has specific provisions relating generally to all Federal flood control projects throughout the State. Specifically, Section 12642 of the California Water Code provides that “[i]n all cases where the Federal Government does not maintain and operate projects, it is the responsibility and duty of the county, city, state agency, or public district affected to maintain and operate flood control and other works, constructed pursuant to Chapters 1 and 2 of this part, after their completion and hold and save the State and the United States free from damages.” This provision of the Water Code applies to Paradise Cut and the rest of the San Joaquin system. See also California Water Code Section 8370. In addition, the Board signed an assurance agreement for the Paradise Cut levees in 1956, in which Reclamation District 2058 agreed to operate and maintain the all levee and channel improvements together with all other project works in accordance regulations prescribed by the Secretary of the Army. One such regulation is 33 CFR 208.10 which among other provisions requires that (1) channels are not are restricted, (2) that the capacity of channels or floodways is not reduced by the formation of shoals etc, and (3) there any such or related channel issues, then immediate steps shall be taken to remedy the conditions by the entity which as has provided assurances.</p>	No
L_RD171-08	Dante Nomellini	Reclamation District 17	<p>RISKS TO LIVES ASSOCIATED WITH EVACUATIONS IS NOT ADEQUATELY ADDRESSED</p> <p>The plan ignores the importance of providing flood protection for critical evacuation and national defense transportation routes. Highways such as Interstate 5, State Highways 4, 12, 80, 99, 120 and 160 to name a few as the means by which large populations must be moved in the event of an emergency. Emergencies could be from flood, earthquake, enemy attack or other calamity. The analysis of flood control projects includes a risk to life analysis but ignores the risk to life resulting from flooding of the evacuation routes.</p>	<p>The CVFPP life loss analysis evaluated the relative basinwide differences in life risk among the impact areas. This was measured by the change in life risk among impact areas. This life loss analysis did not take into account the risk to life resulting from flooding of evacuation routes, which would require a more detailed life risk analysis, such as HEC-FIA. For the purposes of the 2017 CVFPP Update, it would be inappropriate to apply such a detailed life risk analysis on a Central Valley-wide scale. More information on the CVFPP Life Risk Analysis methodology and results are available in the 2017 CVFPP Update - Scenario Technical Analyses Summary Report.</p>	No
L_RD171-09	Dante Nomellini	Reclamation District 17	<p>THE FLOOD RISK ANALYSIS LACKS RECOGNITION OF ACTUAL CONDITIONS</p> <p>Risk to life is based on depth of flooding using height of levee rather than height of floodwater. Relief cuts which are part of the typical flood fight plans along riverine systems are ignored or misunderstood. Analysis of flood routing based on hypothetical walls along rivers ignores the reality of spreading of floodwaters along the way to the Bay. The differential in freeboard between Urban and Agricultural levees does not appear to be recognized in determining water surface elevations. In projecting huge increases in flood flows such as 300,000 cfs at Vernalis it should be recognized that containment in upstream channels is unlikely and the need for storage, flood plain spreading, groundwater recharge and other measures should be focused as far upstream as practical.</p>	<p>Relief cuts are a flood fight responses which are deployed subject to emergent conditions at times of emergency. Analyzing relief cuts is beyond the scope of the 2017 CVFPP Update system scale modeling that evaluates the effectiveness of routine flood management activities and permanent structures.</p> <p>Upstream of the Delta, the models include overtopping and breaching and do not use hypothetical walls to contain all flow in the channels, and so the modeling accounts for floodplain storage when levees are likely to fail or be exceeded. Details are included in the technical appendices. Within the Delta, the models include overtopping only. Regarding the claim of 300,000 cfs flows from climate change, please see response to comment L_COL2-24.</p>	No
L_RD171-10	Dante Nomellini	Reclamation District 17	<p>CLIMATE HAS IN THE PAST AND WILL IN THE FUTURE CHANGE AND THE CHALLENGE FOR FLOOD CONTROL IS TO DETERMINE THE CONSEQUENCES BUT MORE IMPORTANTLY REALISTICALLY DETERMINE HOW PROTECTION OF LIVES AND PROPERTY CAN BE IMPROVED</p>	<p>Comment noted. Planning for the relocation of the assets described in the comment is beyond the scope of the 2017 CVFPP Update to consider in detail.</p> <p>Because the climate is not static, prudent planning for the long term must consider plausible potential future conditions for actions yet to be taken, and to assess the resilience of those that have been or could be completed in</p>	No

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			The Plan focus on less probable events has detracted from the real and immediate needs. In 1986 1-5 flooded at the Twin City road intersection. Nothing has been done to address this critical need. There is no new evacuation route or national defense replacement for 1-5, there is no plan to relocate existing populations or critical public and private facilities and population dependent upon evacuation by way of 1-5 including those in the Bay Area is increasing. The Plan reflects a distraction from how flood protection improvement can be achieved. There is no plan on how to fund flood protection improvements without local contributions to the improvements and maintenance. The consequence of disqualification of communities for funding and restrictions on development has not be adequately analyzed or considered in the Plan.	<p>the near-term after project level analysis has occurred. The analyses developed through the 2017 CVFPP Update provide an understanding of potential future conditions that the actions described in the comments may be founded on.</p> <p>No communities have been disqualified for funding nor have restrictions been placed on local development as part of the 2017 CVFPP Update. The CVFPP is a programmatic plan, not a decision document.</p>	
L_RD171-11	Dante Nomellini	Reclamation District 17	<p>THE PROJECTION OF SEA LEVEL RISE IN THE DELTA BASED ON CONDITIONS AT THE GOLDEN GATE MERITS FURTHER ANALYSIS AND ALAMEDA MAY BE A BETTER INDICATOR</p> <p>The actual and more current NOAA reported sea level trend data should be considered and analyzed as a part of any determination. Generalized global predictions and trends don’t appear to correctly reflect all regional and local conditions. With the curvature of the earth, the spinning on an axis with a variable relationship to the sun, moon and other planets, variation in currents, winds and weather and changes in the earth surface care should be taken not to expect the seas to act like a flat body of water. Attached are copies of data from the NOAA web site showing sea level trends. The data shows variability from site to site and numerous sites where sea level is declining. San Francisco shows a trend of 0.64 feet increase in 100 years, Alameda 0.24 feet increase in 100 years, Juneau, Alaska 4.31 feet decrease in 100 years and Pietarsaari, Finland 2.39 feet decrease in 100 years. Finland was added simply because of its proximity to Greenland. It appears that each site has its own set of bench marks and it doesn’t appear to be correlation to a single reference point of assumed elevation. As to the Delta watershed the San Francisco (Golden Gate) and Alameda stations are most relevant but Alameda may be a better indicator. It is generally recognized that tidal effects are dampened with distance from the Golden Gate but short term surges are likely dissipated in the Bay and the dissipation should be considered. The differences between .24 feet at Alameda and .64 feet at the Golden Gate suggest more than just variation due to distance. Additionally there is evidence indicating that the more recent rate of actual sea level rise at the Golden Gate is declining and that the average levels may be stabilizing or even declining. See attached DWR “Why Climate Change in CVFPP” 33 year Gaussian average for San Francisco in the sea level graph at the lower right corner of the page. Also compare the reported rate of increase for San Francisco to rates of increase reported for prior years. Correlation to measured stage data at interior Delta stations should be analyzed if it hasn’t already been done.</p>	<p>The Resource Management Associates (RMA) delta hydraulics model that was used for the SJR BWFS and 2017 Central Valley Flood Project (CVFPP) Update has been calibrated to accurately capture the dispersion of tides in the Delta.</p> <p>The RMA model extends through the Golden Gate Bridge past the tidal influence into the Delta, as shown in Figure 5-3 of the San Joaquin River BWFS Appendix 5, or Figure 3-9 of the 2017 CVFPP Update - Scenario Technical Analyses Summary Report.</p> <p>The San Francisco Golden Gate Bridge gage was used to gather tide data. This gage has been gathering data since 1897. Moreover, the sea level rise used in the SJR BWFS was used based on the National Research Council report specifically developed for this location. The data this study used was from the Delta.</p> <p>The information used to develop the sea level rise in the SJR BWFS comes from the National Research Council report, Sea Level Rise for the Coasts of California, Oregon, and Washington (2012). The California Department of Water Resources (DWR) applied their sea level rise projection to tidal conditions observed at the Golden Gate Bridge.</p>	No
L_RD1081-03	Fritz Durst	Reclamation District 108	The Central Valley Flood Protection Act of 2008 is very clear; it has only one primary goal which is to improve flood risk management. All other goals are supporting. The Central Valley Flood Protection Board must be diligent in ensuring that the CVFPP 2017 Update and future updates to not lose sight of the original legislative intent. This does not mean that the supporting goals are not important, but it does mean that the supporting goals are secondary. Please be assured that my District and our landowners are very strong advocates of projects which can help enhance fish and wildlife habitat. We support pursuing, where feasible, multi-benefit flood risk reduction projects that are intended to reduce flood risk but that can also create additional public benefits such as enhancing fish and wildlife habitat, protecting farms and ranches, improving water supply and water quality, increasing groundwater recharge, and providing public recreation opportunities, or any combination thereof.	Thank you for your feedback.	No
L_RD1081-04	Fritz Durst	Reclamation District 108	As you are well aware, one of the biggest challenges with this Plan is how its recommendations will ultimately be funded. We are concerned that adding additional fees or assessments on top of existing assessments will erode our capacity to generate funds we need for O&M, and for the local cost share needed to match state, and in some cases Federal, funding for future capital improvement projects. We recommend an Advisory Committee to the CVFPP be established and funded as part of the adoption process for local participation in further exploring the funding concepts introduced in the 2017 CVFPP Update.	DWR and the CVFPB will work together with stakeholders to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three new potential funding mechanisms (Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) will be explored through a transparent and collaborative committee/workgroup process. The State intends to provide detail, where available, on the near-term actions in the Final-Draft CVFPP Investment Strategy and post 2017 CVFPP Update adoption.	No
L_RD1081-05	Fritz Durst	Reclamation District 108	As I mentioned above, we believe the bottom-up approach is the best way to move forward with critical improvements needed for our flood system. Over the last five years, we have seen many locally led projects, with assistance from DWR and this Board, get built relatively quickly. But the flow of funding to locals has not been efficient. The Small Community Program is an example of this. The 2012 Plan highlighted the urgent need to improve flood protection for small communities within the Central Valley, but 5 years later the Small Community funding has not been allocated. We need to do better. We cannot spend 12-18 months working on grant guidelines while locals are ready, waiting to implement projects. The CVFPP 2017 Update contains no defined approach on how State plans to implement the various Management Actions outlined. Collectively, we must find a method to fund local agencies as quickly as possible so this Plan and important public safety projects can be implemented expeditiously. We urge you to form a task force consisting of Board members and staff, DWR staff and local interest to develop a plan on how future flood funding programs can be implemented more efficiently.	DWR acknowledges that there were unexpected delays in implementing the Small Communities Program, however funding is expected to be allocated in 2017. As described in Chapter 4, implementation of the CVFPP is, in part, depended on the availability of federal, State, and local funding. Chapter 4 discusses various mechanisms that could provide a stable source of funding for flood risk management projects. DWR will continue to improve its funding programs to ensure wise and timely State investments.	No

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L_RD1081-06	Fritz Durst	Reclamation District 108	The State’s liability for State Plan of Flood Control facilities, as determined by the courts, has driven the CVFPP and legislation mandating higher levels of flood protection for the Central Valley. The CVFPP 2017 Update should include a section that clearly emphasizes and summarizes the consequences of inaction to reinforce the importance of the investment in State Plan of Flood Control Facilities. Such a description is necessary to demonstrate to the public and the Legislature the consequences of the “no action alternative.” A decision to not invest in flood system improvements may ultimately result in significant costs from a catastrophic flood that would pale in comparison to an ongoing sustainable investment strategy to improve the system.	<p>The following text is proposed to be added to Section 1.1 of the 2017 CVFPP Update:</p> <p>“More than 1 million people live or work in the Central Valley floodplains, which also hosts some of the most productive agricultural land in the nation. In some Central Valley regions, flood risk has been significantly reduced. However, in many parts of the Central Valley, people, property and sensitive ecosystems are still at unacceptably high risk from catastrophic flooding. Future floods are expected to cause more damage due to sea-level rise, climate change, subsidence, and future population growth and development within floodplains. Over time, these future drivers threaten to erode the reductions in flood risk achieved to date. Although significant progress has been made, much remains to be done.</p> <p>The costs of inaction if a major flood disaster were to occur could include loss of life, lost jobs, ruined infrastructure, including highways, businesses, hospitals, as well as homes, and closed businesses that could impact all Californians. Regional agriculture-based economies could be devastated, causing serious impacts to the State economy and disrupting national and international food supplies. When flooding occurs, businesses, homes, schools, and other important structures must be vacated for proper rehabilitation, causing economic and other impacts on families and communities. Communities and livelihoods could further suffer the long-term impacts of plummeting home values, higher flood insurance, and the huge costs of rebuilding. Sustainably investing in flood management now will be a small fraction of the cost of recovering from a major flood disaster later.”</p> <p>Page 3-35 highlights the life loss estimates from the 2017 Without Project Scenario and 2067 Without Project Scenario. The figure highlights that without continued investment in the SPFC, climate change, sea-level rise, and population and land use changes over the next 50 years threaten to increase flood risk over the long-term future. A “Decreased Investment in Central Valley Flood Management” funding scenario was studied in the CVFPP Investment Strategy. It assumed that current funding levels would be frozen and the absence of any new GO bonds would result in only 10% of total capital needs being addressed. Rural and small community areas would be hardest hit by this reduction in State investment.</p>	Yes
L_RD1081-07	Fritz Durst	Reclamation District 108	The CVFPP 2017 Update proposes land use policies which do not appear to be aligned with California’s projected population and economic growth. The State of California is investing billions of dollars in improving Central Valley infrastructure (high speed rail, freeway expansions, etc.) to accommodate this anticipated growth, and the CVFPP Update should make the case to our citizens and our elected officials that similar levels of investment are needed in flood protection if California’s projected growth is to occur in a flood risk management responsible way.	<p>See Response to Comment G_MUSR1-02.</p> <p>As stated in the 2012 CVFPP, the SSIA is intended to reduce flood risk in the areas protected by SPFC facilities while discouraging land use changes that promote growth in deep floodplains and increase State flood hazards. The wise use of floodplains does not stipulate “no growth” within the floodplain, but encourages responsible growth consistent with wise floodplain management. The 2017 CVFPP Update states that urban flood risk reduction investments will be structured to assure that the aggregate economic and life safety risks are hold constant or reduced over time. Past decisions to allow urban development in rural Central Valley floodplains have exposed lives and property to high levels of flood risk, especially in deep or quick-filling basins. If urban development continues in these floodplains, cumulative flood damages and loss of life will likely increase over time.</p>	No
L_RD1081-08	Fritz Durst	Reclamation District 108	We support the evaluation of the State Flood Insurance Program that plays the dual role of mitigating flood risk and funding implementation of the CVFPP. We recommend establishing an Advisory Committee to the CVFPB to further discussions considering substitution of a State/Regional administered flood insurance program for the NFIP that includes local participation.	<p>DWR and the CVFPB will work together with stakeholders to further develop and evaluate each new potential funding mechanism. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. The three potential funding mechanisms (an updated Sacramento/San Joaquin Drainage District, State Flood Insurance Program, and State River Basin Assessment) would be developed through a transparent and collaborative committee/workgroup process. The State intends to provide detail, where available, on the near-term actions in the Final-Draft CVFPP Investment Strategy and post 2017 CVFPP Update adoption.</p>	No
L_RD1081-09	Fritz Durst	Reclamation District 108	The Agricultural Floodplain Task Force recommendations were a great achievement in identifying supportable changes to the National Flood Insurance Program (NFIP). We must now all work together to ensure the recommendations of this Task Force are adopted by the Federal Emergency Management Agency (FEMA). Maintaining the economic vitality of agriculture is one of the key elements in managing residual risk behind levees in rural areas.	<p>Thank you for your comment. DWR looks forward to continued coordination and collaboration.</p>	No
L_RD1081-10	Fritz Durst	Reclamation District 108	We are being reminded this year how critically important our bypass systems are to the overall operation of the flood protection system. For our region, the bypasses are our “emergency spillways,” and we’ve all seen recently how critical it is to have properly functioning emergency spillways. It is essential that the bypasses be actively managed and maintained to ensure they are ready to function as designed, when we need them. We want to thank you and DWR for your work improving conditions in the Tisdale Bypass, but we remain concerned that land uses and land management practices not compatible with a flood bypass system are being allowed to impact flood flow conveyance of the overall bypass system and that debris and sediment build-up is impacting flow conveyance. Because of this, the Feather River Region and Mid & Upper Sacramento River region have begun working together to develop a Comprehensive Management Plan for the Sutter Bypass system. There are great opportunities for multi-benefit projects compatible with the Sutter Bypass that can enhance not only flood protection, but also habitat. This effort is just beginning and we’ll need your help as the process moves forward. We understand and	<p>Thank you for your comment. DWR understands your concern regarding land use and land management practices and looks forward to continued coordination and collaboration to address these issues.</p>	No

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			appreciate that managing a major bypass system is difficult and requires significant resources, but as we’ve seen in Oroville, not having your emergency spillway ready when you need it can end up requiring a lot more resources.		
L_RD1081-11	Fritz Durst	Reclamation District 108	This year’s flood event also reinforced the value in comprehensive flood emergency response planning. Thanks to a grant from DWR, our Region was able to prepare detailed flood emergency response plans which were put to great use during this year’s flood. We urge you to continue supporting funding allocations for flood emergency response planning.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_RD1081-12	Fritz Durst	Reclamation District 108	The 2012 plan did not discuss storage so we are pleased to see that this Update mentions storage as an option to improve flood protection. I realize that it’s too late for this Update to address in detail flood storage options, but it must become a priority for the 2022 Update. My District is playing a leading role in the Site Reservoir project so I understand how challenging it is to move storage projects forward. Storage projects take a long time to implement, therefore we must start immediately looking in depth at this issue. Climate change is changing our hydrologic conditions so we must explore every option available to us to meet the challenges climate change in bringing.	Thank you for your feedback. A wide variety of actions were studied as part of the 2017 CVFPP Update to address future climate change and will continue to be studied in future CVFPP Updates.	No
L_RD1081-13	Fritz Durst	Reclamation District 108	The final adoption process for the 2012 Plan involved a “clarifying” resolution being adopted by the Board which detailed changes the Board wanted to make to the 2012 Plan but which were not included in the body of the 2012 Plan itself. We urge you to request DWR make any Board requested changes to the Plan itself, and avoid the need for a clarifying resolution. This would allow the Board, the State and local agencies to more clearly and effectively communicate the goals and objectives of the CVFPP 2017 Update to the public and our elected officials, as we all work together to gather support for its implementation.	Contents of the resolution are at the discretion of the Board.	No
L_RD1081-14	Fritz Durst	Reclamation District 108	In closing I want to thank this Board for all your support. It’s refreshing to work with a State Board that places significant focus on local issues and puts so much effort into supporting local agencies. We also want to commend DWR staff and the Board staff for all their efforts in developing this Update. It has been a much more engaged process for us and we look forward to continuing to work with you and DWR on these important and challenging issues.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_RD15001-01	Steven Butler	Reclamation District 1500	Sutter Bypass levee relocation: current plans to setback the West Levee need to be re-considered. A setback of the East Levee would be a lot cheaper. Higher land elevation would allow a smaller levee to be built. Much of the adjoining land on the East side is in conservation easement. The habitat lands would appraise at a lower value than the farmland to the West. At present, the Sutter Mutual Water Co. has a large canal at the toe of the West levee that would need to be re-constructed to serve our customers.	As described in “Feather River - Sutter Bypass Multi-benefit Improvements”, it is recommended that the State continue to study the Feather River-Sutter Bypass and no specific recommendations have been made. As DWR studies this area further, we look forward to continued coordination and collaboration with both regional and local stakeholders.	No
L_RD20351-01	Robert Thomas	Reclamation District 2035	Thank you for allowing me to address the Board. My name is Robert Thomas. I am representing Conaway Preservation Group and I also serve as President of Reclamation District 2035 (RD 2035). I want to commend the California Department of Water Resources (DWR) for completing the 2017 Update of the Central Valley Flood Protection Plan (CVFPP) on time as required by the Legislature. I know that it is a major undertaking and requires a large number of resources to develop such a Plan. I also appreciate the Board’s efforts in engaging stakeholders, including the general public, in order to seek their input before adopting the Plan. I am here today to thank you and the DWR for including the Conaway Levee Setback and Transitory Storage Study in the 2017 Update of the Central Valley Flood Protection Plan.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_RD20351-02	Robert Thomas	Reclamation District 2035	As you may know, the concept of the Conaway Levee Setback and Transitory Storage is supported by the City of Woodland, the City of Davis, Yolo County, the California Department of Transportation (Caltrans), the Sacramento Area Flood Control Agency (SAFCA), RD 2035 and Conaway Ranch. The proposed study is also recommended and endorsed by the Lower Sacramento River/Delta North Regional Flood Management Plan. Overall, we are satisfied that further study of this concept is now included in the 2017 Update of the CVFPP. The Conaway Levee Setback and Transitory Storage are mentioned on pages 3-12 and 3-14 of the draft Central Valley Flood Protection Plan. However, it would be better if the proposed project would also be mentioned on page 3-5 under Systemwide Reservoir Storage and on page 3-21 under Floodplain Storage Actions. These pages are attached with the proposed inserts for your consideration. Additionally, I am requesting that the spelling of the Conaway Ranch be corrected on map 3-3 (shown on page 3-14). We are also planning to submit these comments to DWR.	Table 3-2 has been revised and Section 3.1.2, under Flood Storage Action, has been revised to as follows: “Additional sites were identified by the Feather River RFMP, at the Oroville Wildlife Area, and the Lower Sacramento River/Delta North RFMP, at Conaway Ranch.”	No
L_RD20351-03	Robert Thomas	Reclamation District 2035	Four sites identified by RFMPs at Dos Rios, Three Amigos, Oroville Wildlife Area and Conaway Ranch in Yolo County.	Table 3-2 has been revised.	Yes
L_RD20351-04	Robert Thomas	Reclamation District 2035	The Lower Sacramento River/Delta North RFMP identified the Conaway Levee Setback and Transitory Storage area that could provide up to 72,000 acre-feet of transitory storage from willing landowners along the west side of the Yolo Bypass in extreme flood events. The project could also reduce the risk of flooding along Interstate 5 corridor connecting the City of Woodland to the Natomas Basin and Downtown Sacramento; provide potential groundwater recharge and wildlife habitat enhancements; protect the Yolo County Landfill from inundation; and facilitate relocation of the Sierra Northern Railway to the west side of the Yolo Bypass so as to eliminate the risks associated	Thank you for your comment. DWR has met and will continue to coordinate with the Engineer for RD 2035 on this project.	No

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			with continued use of the antiquated railway trestle across the Yolo Bypass and expedite the widening of the Sacramento Weir. The key action includes further study of this project.		
L_RD20351-05	Robert Thomas	Reclamation District 2035	Please correct the spelling of Conaway Ranch. The “a” is missing from “Conaway” as listed on the map 3· 3.	Map 3-3 has been revised to correct the misspelling.	Yes
L_RD20352-01	Robert Thomas	Reclamation District 2035	On behalf of Reclamation District (RD) 2035, I want to commend the California Department of Water Resources (DWR) for completing the 2017 Update of the Central Valley Flood Protection Plan (CVFPP) on time as required by the Legislature. I know that it is a major undertaking and requires a large number of resources to develop such a Plan. I also appreciate the Central Valley Flood Protection Board’s efforts for engaging stakeholders, including the general public, in order to seek their input before adopting the CVFPP. We are glad to see that DWR included the Conaway Levee Setback and Transitory Storage for further study in the 2017 Update of the Central Valley Flood Protection Plan.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_RD20352-02	Robert Thomas	Reclamation District 2035	As you may know, the concept of the Conaway Levee Setback and Transitory Storage is supported by the City of Woodland, the City of Davis, Yolo County, the California Department of Transportation (Caltrans), the Sacramento Area Flood Control Agency (SAFCA), RD 2035 and Conaway Ranch. The copies of support letters from all of these agencies were shared with the DWR and the Central Valley Flood Protection Board. The proposed study is also recommended and endorsed by the Lower Sacramento River/Delta North Regional Flood Management Plan. Overall, we are satisfied that further study of this concept is now included in the 2017 Update of the CVFPP. The Conaway Levee Setback and Transitory Storage is mentioned on pages 3-12 and 3-14 of the draft Central Valley Flood Protection Plan. However, we feel that it would be better if the proposed project is also mentioned on page 3-5 under System-wide Reservoir Storage, as well as on page 3-21 under Floodplain Storage Actions. These pages are attached with the proposed inserts for your consideration. Additionally, we request that the spelling of the Conaway Ranch be corrected on the map 3-3 shown on page 3-14.	Please see response to Comment L_RD20351-02.	No
L_RD20352-04	Robert Thomas	Reclamation District 2035	Four sites identified by RFMPs at Dos Rios, Three Amigos, Oroville Wildlife Area and Conaway Ranch in Yolo County.	Please see response to Comment L_RD20351-03.	No
L_RD20352-05	Robert Thomas	Reclamation District 2035	Please correct the spelling of Conaway Ranch. The “a” is missing from “Conaway” as listed on the map 3· 3.	Please see response to Comment L_RD20351-05.	No
L_RD20352-06	Robert Thomas	Reclamation District 2035	The Lower Sacramento River/Delta North RFMP identified the Conaway Levee Setback and Transitory Storage area that could provide up to 72,000 acre-feet of transitory storage from willing landowners along the west side of the Yolo Bypass in extreme flood events. The project could also reduce the risk of flooding along Interstate 5 corridor connecting the City of Woodland to the Natomas Basin and Downtown Sacramento; provide potential groundwater recharge and wildlife habitat enhancements; protect the Yolo County Landfill from inundation; and facilitate relocation of the Sierra Northern Railway to the west side of the Yolo Bypass so as to eliminate the risks associated with continued use of the antiquated railway trestle across the Yolo Bypass and expedite the widening of the Sacramento Weir. The key action includes further study of this project.	Please see response to Comment L_RD20351-02.	No
L_SJCPW1-01	SJCPW	San Joaquin County Public Works	Development within the City’s General Plan boundaries is critical in order to provide tens of millions in developer funding for the local share of the RD 17 levee improvements. Without development to fund the local share, there is no local funding for levee improvements, including those described in the State Plan of Flood Control. Section 3.2.1, however, states that urban flood risk reduction investments under the SSIA will be structure to assure that the aggregate economic and life safety are held constant or reduced over time and will be limited to areas protected by SPFC facilities. However, the CVFPP Update does not include improvements to SPFC flood protection facilities that are needed in order to protect urbanizing and urbanized areas in RD17. This is inconsistent with SB 5.	See response to Comment L_COL2-14.	No
L_SJCPW1-02	SJCPW	San Joaquin County Public Works	Section 1.4 of the CVFPP Update states that the 2017 CVFPP Update provides an updated estimate of investments totaling \$17 to \$21 billion needed over the next 30 years. The 2017 CVFPP Update, however, does not include any improvements to any of the RD 17 levees outside of the Stockton urban area as further discussed in page 2-8.	Please see the response to comment L_COST1-09.	No
L_SJCPW1-03	SJCPW	San Joaquin County Public Works	The CVFPP Update states that the plan serves to estimate the costs and implementation approach to achieve the 2008 legislative objective. However, the update does not include any improvements to provide 200-year flood protection for all of RD 17 including the cities of Lathrop and Manteca. The CVFPP Update and the State’s levee investment strategy should focus on protecting existing and future development in urban and urbanized areas in a manner consistent with the local land use agency General Plans which were found to be consistent with the Delta Plan.	Please see the response to comment L_COST1-09.	No
L_SJCPW1-04	SJCPW	San Joaquin County Public Works	The recommendation for State flood management investment should consider the need to protect critical infrastructure and facilities. RD 17 alone, is occupied by more than 60 critical facilities which provide evacuation routes, life-safety facilities and other resources needed during flood events. No analysis is provided in the CVFPP Update or the PEIR regarding how the flood management improvements identified in the CVFPP Update would actually protect critical facilities.	Please see response to comment L_COST1-08.	No

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L_SJCPW1-05	SJCPW	San Joaquin County Public Works	Earlier this month, DWR released a draft Technical Memorandum entitled “Central Valley Flood Protection Investment Strategy” (Investment Strategy) which also is being used to inform State levee investments in the region. Based on our initial review of the DWR Investment Strategy, it appears to be inconsistent with the recently released Delta Stewardship Council Delta Levee Investment Strategy (DLIS) for the region. The Council’s DLIS designates the Reclamation District (RD 17) Levees as Very High Priority for the State Levee investment to protect the region in a manner consistent with the Delta Plan. Based on out review of the DWR Investment Strategy there no investment priorities for the RD 17 levees.	Please see response to Comment L-COL1-02.	No
L_SJCPW1-06	SJCPW	San Joaquin County Public Works	DWR claimed that both the Sacramento River Basin and the San Joaquin River Basin were subject to the same public review process with respect to the availability of their respective Basinwide Feasibility Studies (also see page 2-2). However unlike the process for the Sacramento River Basin in which DWR circulated a draft Basinwide Feasibility Study and responses to stakeholder comments (as of November 2016), DWR circulated the 2017 CVFPP Update and PEIR <i>without</i> an updated San Joaquin River Basinwide Feasibility Study or without responses to the stakeholder comments on the prior stakeholder draft of the feasibility study which were only released to the stakeholders on Wednesday, March 15. Consequently, DWR has implemented inconsistent public review processes for the San Joaquin River Basin and Sacramento River Basin and deprived the public and local agencies of an opportunity to review the technical information DWR relied to support the CVFPP Update.	Thank you for your comment. As noted, the review process for the San Joaquin River Basin-wide Feasibility Study (BWFS) was delayed, as compared to the Sacramento River BWFS. However, the general process was the same with a stakeholder review process completed prior to the release of the 2017 CVFPP Update. Neither the Sacramento nor the San Joaquin BWFS had a second comment period.	No
L_SJRFCPA1-01	Reggie Hill	San Joaquin River Flood Control Project Agency	<p>The San Joaquin River Flood Control Project Agency (SJRFCPA) appreciates the opportunity to provide comments on the Public Draft 2017 Central Valley Flood Protection Plan (CVFPP) Update.</p> <p>The Upper San Joaquin Region (USJR) is a very productive agricultural region and special consideration should be given to the flood management challenges that face a predominately rural area with a large number of disadvantaged communities that have very limited funds and resources to implement needed flood improvement projects.</p> <p>To preface the following comments, the USJR region endorses the recommendations provided to the Central Valley Flood Protection Board (CVFPB) by the CVFPB Advisory Committee. While those recommendations were developed for the CYFPB, it is anticipated that they will also inform DWR and support development of the CVFPP 2017 Update prior to its being brought to the CVFPB for approval.</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
L_SJRFCPA1-02	Reggie Hill	San Joaquin River Flood Control Project Agency	Need to demonstrate better alignment with RFMPs to help gain local support and understanding. Local support will be needed to gain legislative support for finding a shared vision of how to improve the flood management system in a way that reduces flood risk and benefits the environment.	As described by Chapter 2 of the 2017 CVFPP Update, the six RFMPs were crucial to understanding local and regional flood management priorities, challenges, and potential funding mechanisms along with site-specific improvement needs. The management actions identified in the RFMPs were used to help refine the SSIA (See Section 2.1.2). As DWR continues to implement and update the CVFPP, we look forward to continuing the iterative planning process described in Figure 2-2 in close coordination with local and regional stakeholders.	No
L_SJRFCPA1-03	Reggie Hill	San Joaquin River Flood Control Project Agency	Since a meaningful discussion of the San Joaquin Valley issues and potential actions was missing from the 2012 CVFPP, a more thorough presentation is warranted in this 2017 update. The tables and figures provide limited information that shows very limited actual demonstrated flood benefit in terms of water surface elevation or peak flows.	<p>For a more in-depth discussion of the San Joaquin Valley, please see the San Joaquin River BWFS. The 2017 CVFPP Update refines those actions described in the 2012 CVFPP. These refinements were supported primarily through the BWFS, the three San Joaquin Valley RFMPs and the Conservation Strategy. While consistent with the 2012 CVFPP, an expanded set of San Joaquin Basin actions is included in the 2017 CVFPP Update due to the supporting documents listed above.</p> <p>It is acknowledged that most of the proposed systemwide improvements provide benefits in the Lower San Joaquin region (Paradise Cut, reservoir management actions, etc.) where there are greater assets at risk. It should be noted that water surface elevation or peak flows is not always the best metric for flood risk reduction. For example, Map 3-9 shows stage and flow increases at Firebaugh. However, this is because Firebaugh would be protected by 100-year level of protection levee improvements that would prevent flooding and therefore increase stages (relative to baseline conditions) adjacent and downstream of these levees. Even though stages and flows would increase, risk to flood would be reduced significantly in Firebaugh.</p>	No
L_SJRFCPA1-04	Reggie Hill	San Joaquin River Flood Control Project Agency	Recommended actions to address identified policy issues need to be formulated as actual concrete actions versus general terms such as “continue coordination” and “continue a dialogue.”	The recommendations identified in Section 4.5.1 will be refined and clarified as part of DWR’s work for the 2022 CVFPP Update. More specific actions will be identified as more detailed workplans are developed for each policy issue. As part of this refinement process, DWR will work closely with local and regional stakeholders to better understand all perspectives of the policy issues.	No
L_SJRFCPA1-05	Reggie Hill	San Joaquin River Flood Control Project Agency	The 2017 CVFPP Update should place a greater emphasis on integrated Water Management (IWM) principles and IWM benefits beyond flood risk reduction and ecosystem enhancements. The term ‘multi-benefit project’ is described as including a full range of benefits. While specific benefits will vary by project, it appears that a more narrow range of benefits are being emphasized. The water supply, groundwater, land subsidence, and water quality issues in the San Joaquin Valley represent great opportunities for creative IWM solutions that provide benefits beyond flood risk reduction and ecosystem enhancements.	<p>Please see response to comment L_COL2-19.</p> <p>Section 3.2.5 provides a more in-depth discussion on the issues surrounding the development of multi-benefit projects. These include financial, legal, policy and institutional barriers hindering implementation of these projects. Section 3.2.5 also identifies other IWM benefits that might be achieved through projects with multiple benefits including increasing resiliency and improving water supply, water quality, recreation, and public education. Several groundwater/conjunctive use recharge actions included in the 2017 SSIA Portfolio acknowledge the linkage between flood management, water supply and land subsidence.</p>	No

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L_SJRFCPA1-06	Reggie Hill	San Joaquin River Flood Control Project Agency	Sediment problems in the Upper San Joaquin River Region are a significant issue not acknowledged in the Draft 2017 CVFPP Update; we recommend that the document both acknowledge the issue and recommend a basin-scale investigation to address information gaps, develop sediment models, and develop actions to be included in the 2017 Update.	See response to comment G_MSJRR1-02.	No
L_SJRFCPA1-07	Reggie Hill	San Joaquin River Flood Control Project Agency	Land Use and Floodplain Management: This issue needs to include recognition of the value of preserving sustainable agriculture in the floodplain, not just limiting urban development.	As described in Section 2.3.2 for Perspectives on Land Use and Floodplain Management, one of the areas of agreement with stakeholders and DWR is that “Agricultural lands have economic, environmental, and cultural value, and impacts to farmland and local agricultural economies should be minimized.”	No
L_SJRFCPA1-8	Reggie Hill	San Joaquin River Flood Control Project Agency	Multi-benefit Projects: This issue should include recognition of financial, legal, and political constraints, and emphasize the value of water supply, water quality, ecosystem and other integrated water management (IWM) benefits throughout the document.	Please see response to Comment L_SJRFCPA1-05.	No
L_SJRFCPA1-09	Reggie Hill	San Joaquin River Flood Control Project Agency	Areas of Agreement regarding Perspectives on Funding: It is recognized that there is a “need for additional funding and increased cost share by the State for project planning and implementation in areas with disadvantaged communities,” However, the last recommendation on page 4-37 under Recommendations for Effective Governance and institutional Support is focused only on facilitating the participation of disadvantaged communities in planning efforts. The recommendations should go beyond facilitation of participation in planning efforts and include steps toward establishing an increased cost share by the State.	Revised text on Page 4-37 to the following: Continue to support disadvantaged communities in participating in RFMPs and future updates of the CVFPP and project implementation (S/L). The State is committed to the continued support of disadvantaged communities consistent with the Governor’s Water Action Plan through facilitating their continued participation in planning efforts at all planning scales and, to the extent feasible based on available resources, providing them assistance for project implementation.”	Yes
L_SJRFCPA1-10	Reggie Hill	San Joaquin River Flood Control Project Agency	SSIA Refinements: There needs to be a section prior to Table 3-2 describing the criteria and process that was used to select the refinements included in the table. Especially for the San Joaquin Valley, the 2012 CVFPP included very minimal information and there needs to be some explanation for why these projects were selected for inclusion in the 2017 CVFPP.	As described in Section 2.1.2, the SSIA was refined using the Sacramento River and San Joaquin River Basin-wide Feasibility Studies, USACE lead feasibility studies, the six RFMPs, and the Conservation Strategy. The management actions identified in these sources were used to assemble a collection of potential CVFPP management actions, which were then checked for consistency with the 2012 CVFPP SSIA. Specific to the RFMPs, not all of the actions identified by the RFMPs were consistent with the goals and polices of the CVFPP. DWR has met regularly with RFMP representatives to discuss and refine these management actions for the 2017 CVFPP Update. For a more detailed description of how the 2017 CVFPP SSIA Portfolio was developed, please refer to Chapter 3 of the CVFPP Investment Strategy.	No
L_SJRFCPA1-11	Reggie Hill	San Joaquin River Flood Control Project Agency	Groundwater Recharge: Add note that states landowner withdrawal efforts of the flood waters from flood the project channels, for beneficial use in groundwater recharge, greatly contributes to the efforts in reducing subsidence affects along the flood project systems. This effort in recharging the upper groundwater aquifer contributes to reduction of needing to pump from deeper aquifers, which has been proven to contribute to land area subsidence. This subsidence has proven to have an adverse impact on the flood channel capacities. Any reduction of the flood channel capacities could assist in preventing levee over-topping that would cause widespread flooding of adjacent lands and communities. This statement is supported in the third paragraph on page 3-11 as it relates to groundwater recharge with flood waters.	“Page 3-21 already states: “The San Joaquin River BWFS and RFMPs found that groundwater recharge could replenish the stressed aquifer in the San Joaquin River flood system to enhance regional water supply and potentially reduce and prevent future subsidence and its potential impacts on flood system capacity.”	No
L_SJRFCPA1-12	Reggie Hill	San Joaquin River Flood Control Project Agency	Small Communities: Add note that the small community of Franklin/Beachwood was identified as protected by State Plan of Flood Control (SPFC) Facilities per updated DWR Levee Flood Protection Zone (LFPZ) modeling analysis.	The community of Franklin-Beechwood is identified in Map 3-2 as a Small Community.	No
L_SJRFCPA1-13	Reggie Hill	San Joaquin River Flood Control Project Agency	Systemwide Actions That Bolster Resiliency: This section has a focus on ecosystem restoration and seems to completely neglect other IWM opportunities such as water supply, water quality, and has a very minimal discussion of potential conjunctive use and groundwater recharge opportunities.	Please see response to Comment L_SJRFCPA1-05. Although this section does focus on ecosystem restoration, it also includes a section on “conjunctive and groundwater recharge”. Yolo Bypass improvements also highlight opportunities for recreation benefits. As specific projects move forward, further studies will be conducted on other potential IWM opportunities at a project level of study.	No
L_SJRFCPA1-14	Reggie Hill	San Joaquin River Flood Control Project Agency	Conjunctive Use and Groundwater Recharge: As briefly discussed above, the analysis of conjunctive use of flood waters for groundwater recharge should be expanded. There are numerous health and safety benefits to reducing the amount of flood flows and allowing that water to recharge the groundwater aquifers, especially in light of the Sustainable Groundwater Management Act of 7AA.	Attachment 8L of the 2012 CCVFPP analyzed potential groundwater recharge locations in the Central Valley. This analysis concluded that rates of groundwater recharge are typically low relative to large flood flows, and capturing those flood flows for groundwater recharge purposes would have only a small impact on lowering flood stage and flood risk. The San Joaquin BWFS reiterated these conclusions, but also noted that groundwater recharge could replenish the stressed aquifer to enhance regional water supply and potentially reduce and prevent future subsidence and its associated impacts on the flood system. The San Joaquin BWFS also identified some future potential groundwater recharge locations that were included in the 2017 CVFPP SSIA Portfolio. The 2017 CVFPP Update is a programmatic document, and not a project-level decision document. Since groundwater recharge provides marginal direct flood management benefits, future groundwater recharge opportunities should be identified and further refined through other programs that focus more specifically on water supply. Therefore, the level of detail on conjunctive use/groundwater recharge in the 2017 CVFPP Update is appropriate.	No
L_SJRFCPA1-15	Reggie Hill	San Joaquin River Flood Control Project Agency	The Urban Portfolio: The City of Merced bullet point has minor inaccuracies and should be revised to read: “Continued support of the Merced County Streams Group effort to identify urban levee improvements and storage opportunities to provide protection from flooding for the City of Merced.”	Concur. This revision has been made. Text now reads: “Continued support of the Merced County Streams Group effort to identify urban levee improvements and storage opportunities to provide the City of Merced with protection from flooding.”	Yes

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L_SJRFCPA1-16	Reggie Hill	San Joaquin River Flood Control Project Agency	The San Joaquin River at Firebaugh results shown on the figure appear to show no apparent water service elevation (WSE) or peak flow reduction benefits for the 2067 with Project conditions. Under the 1% and 0.5% events the WSE and peak flows actually increase over the without project condition.	Comment noted. The system elements that affect Firebaugh are levee raises along Firebaugh. For larger events, such as the 0.5% event, the taller levees contain the flow in the river and cause higher stage and flow when compared to the without project conditions. Please also see response to Comment L_SJRFCPA1-03.	No
L_SJRFCPA1-17	Reggie Hill	San Joaquin River Flood Control Project Agency	The San Joaquin River at Newman results also show no WSE or peak flow reduction under the with Project condition. Does this analysis account for improvements to fix the subsidence problem in the Eastside Bypass?	This analysis does not include subsidence in the modeling. There are no upstream system elements that would cause a reduction in stage or flow.	No
L_SJRFCPA1-18	Reggie Hill	San Joaquin River Flood Control Project Agency	The San Joaquin River at Vernalis also shows very limited reductions (and some increases) in WSE and peak flow under the2067 with Project condition. Is this because the Paradise Cut project is primarily an ecosystem project and provides little actual flood benefit?	The Paradise Cut project is intended to have impacts on flood management, specifically to reduce flow and stage in the Lathrop and Manteca area, downstream of the Paradise Cut confluence with the San Joaquin River. For the future conditions, the climate change flows are so large that upstream system elements are overwhelmed and have a small impact on stage and flow at Vernalis. Paradise Cut is downstream of Vernalis and although it does have some upstream effect on stage, Vernalis is too far upstream to be affected by Paradise Cut project.	No
L_SJRFCPA1-19	Reggie Hill	San Joaquin River Flood Control Project Agency	Driving Policies Toward Effective implementation: Since this section has to do with implementation it is suggested that the recommendations from Section 4.5.1 be moved forward and integrated with this discussion. This section as it stands uses a lot of broad language and statements that are not really relevant to implementation, and much of the text is redundant with previous sections.	Thank you for your comments. Section 3.2 summarizes context and DWR’s overall strategy to address these issues, while the recommendations in Section 4.5.1, are meant to be an accumulation of information presented in the previous three chapters, and identifies the actions that DWR anticipates taking to address the issues in the near term. Many of these recommendations are critical for implementing the Plan and will provide a foundation for the future of flood management in the Central Valley.	No
L_SJRFCPA1-20	Reggie Hill	San Joaquin River Flood Control Project Agency	Development of Multi-benefit Projects: This section is focused solely on ecosystem and neglects the other IWM benefits such as water supply, water quality, and groundwater recharge that can be integrated with flood management projects.	Please see response to Comment L_SJRFCPA1-05. The first sentence of this section identifies that multiple benefits include “improving water supply, water quality, recreation, and public education related to integrated water management.”	No
L_SJRFCPA1-21	Reggie Hill	San Joaquin River Flood Control Project Agency	Moving from Recommended Actions Toward Implementation: It states that “This chapter described the 2017 Refined SSIA portfolio of proposed management actions that with achieve the CVFPP goals. But, there doesn’t appear to be any evidence provided to substantiate this claim. The list of projects and figures are informational, but how does the reader draw the conclusion that these proposed actions will achieve the CVFPP goals and justify the cost?	The CVFPP is not a decisional document, but instead is a programmatic level descriptive document. The Plan does not guarantee funding or permitting for any specific project. As such, the outcomes identified in Chapter 3 are what the 2017 CVFPP hopes to achieve at a programmatic level. A large number of actions were qualitatively assessed for their contribution to the societal outcomes. As projects are further analyzed at a project level and move towards implementation, their feasibility and benefits will be more rigorously evaluated in coordination/collaboration with federal, state and local stakeholders.	No
L_SJRFCPA1-22	Reggie Hill	San Joaquin River Flood Control Project Agency	Estimating Costs: Suggest adding the CVFPP Investment Strategy TM as an appendix to the document.	Although the Draft CVFPP Investment Strategy is not an appendix to the 2017 CVFPP Update because it is not intended to be adopted, it is one of several supporting documents that provides additional detail and technical support for the Plan. The Draft CVFPP Investment Strategy is available on the CVFMP website with the other supporting documents of the 2017 CVFPP Update.	No
L_SJRFCPA1-23	Reggie Hill	San Joaquin River Flood Control Project Agency	Analyzing the Portfolio and Applying Funding Mechanisms: This section states that CVFPP implementation will require much larger contributions from all entities, including locals that would need to generate matching funds for capital improvements and more funds for ongoing costs. While it is reasonable for all entities to invest more, raising funds will continue to be difficult for rural and lower income areas. Many of the cost share rules that apply to existing programs preclude local agencies ability to participate. When the local cost share is relatively low and in-kind services are an option, local participation increases. The Flood System Repair Project is one example. When the cost share is reduced and in-kind services apply toward the cost share, rural agencies are able to participate.	DWR and the CVFPB will work together with stakeholders to further explore and evaluate potential new funding mechanisms. In-kind services and different levels of cost-shares will be evaluated. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. Funding is one of the 8 top policy issues to be addressed through a transparent and collaborative effort.	No
L_SJRFCPA1-24	Reggie Hill	San Joaquin River Flood Control Project Agency	Recommendations for Flood Management-Related Policy Issues - O&M: Suggest adding a bullet on providing funding for Resource Agencies to participate in development of long-term O&M permitting agreements.	Text was added to Section 4.5.3, which reads: The CVFPB may consider establishing a committee similar to the CVFPP Conservation Strategy Advisory Committee to evaluate how to improve permitting, reduce the cost of and time required to obtain permits, and improve ecosystem functions and habitats. This committee could address the following: (1) integration of the CVFPP Conservation Strategy’s measurable objectives, (2) leveraging projects within and across regions to collectively achieve multiple - benefits, (3) leveraging of new legislation such as AB 2087 (Regional Conservation Investment Strategies), (4) applying new tools for quantifying and crediting project benefits (5) identifying additional needs for permitting improvements and the pathways to implement them, (6) permitting of pilot projects, applying innovative approaches and refining them, including (a) evaluation of the potential to establish regional plans as Regional Conservation Investment Strategies (RCISS) under AB 2087, (b) quantification of estimation of regional plan contributions to CVFPP Conservation Strategy measurable objectives ecosystem vitality outcomes along with other multi-benefit outcomes, and (c) identification of specific regional plan proposed regional projects as potential case studies for innovative permitting. Consideration should also be given to the lessons learned from regional advanced mitigation projects, and the Central Valley Habitat Exchange, as it continues to develop.	Yes
L_SJRFCPA1-25	Reggie Hill	San Joaquin River Flood Control Project Agency	Recommendations for Flood Management-Related Policy Issues - Multi-benefit Projects: Suggest adding a bullet to support dedication of funds to promote development of mitigation banking programs.	Text was added to Section 4.5.3, which reads: “Consideration should be given to ways to increase landowner participation in expanded ecosystem service markets. For more information, see Section 3.2.5.”	Yes

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L_SJRFCPA1-26	Reggie Hill	San Joaquin River Flood Control Project Agency	Recommendations for Flood Management-Related Policy Issues - Funding: Suggest adding a bullet with action item to develop finance programs to assist disadvantaged communities.	Add to Section 4.5.3 “Conservation Strategy Advisory Committee Recommendations for the Way Forward”: The RFMPs have proven extremely valuable in the development of the 2017 CVFPP Update. In order to assist in future updates it would be very beneficial for the State to continue providing funding to the extent available for the RFMPs or LMAs, especially for those that engage in corridor management plans and project development. An additional State cost-share may be appropriate for disadvantaged communities.	Yes
L_SJAFA2-01	San Joaquin Area Flood Control Agency	James Giottonini	<p>We previously submitted numerous comments on the "Stakeholder Review Draft of the San Joaquin River Basin-wide Feasibility Study" on November 23, 2016 (enclosed). We were informed that the revised draft of the Basin-wide Feasibility Study would not be released for public review until the end of March. Since the Basin-wide Feasibility Study was meant to inform the 2017 Update, this is troubling. There are 4 major issues/concerns that were discussed in the Basin-wide Feasibility Study that should be clarified in the 2017 Update:</p> <ul style="list-style-type: none">Does the State Recommended Plan for Stockton Levee Improvements include improvements to Bear Creek/Mosher Slough/Calaveras River/Diverting Canal that provide 200-year protection (with SLR/CC) for the entire Stockton urban area per ULDC?Does the State Recommended Plan for RD 17 Levee Improvements provide 200-year protection (with SLR/CC) for RD 17 per ULDC?Is the State Recommended Plan for Paradise Cut needed for 200-year protection (with SLR/CC) for RD 17 per ULDC, or is it proposed for multi-benefits/ resiliency outcomes? Likewise, is the proposed Yolo Bypass improvements needed for 200-year protection for urban areas (i .e. Natomas) or is it proposed for multi-benefits/resiliency outcomes?Are the 200-year flows/stages (with SLR/CC) for the rivers and streams sufficient "for design purposes to determine urban level of protection" or simply "a specific flood event for planning purposes to compare multiple alternatives", or "a surrogate for the 200-year flood with climate change"?-please refer to responses to comments 169 and 183 to City of Davis on the Sacramento Basinwide Feasibility Study. <p>The 2017 Update should be revised to clearly state the answers to these issues/concerns to enable better public understanding and support for the Plan.</p>	<ol style="list-style-type: none">Yes, the State Recommended Plan includes improvements to Bear Creek/Mosher Slough/Calaveras River/Diverting Canal that provide 200-year level of protection with sea-level rise and climate change.Yes, the State Recommended Plan includes RD 17 levee improvements to provide 200-year level of protection with sea-level rise and climate change.Paradise Cut Bypass expansion is included in the State Recommended Plan to provide enhanced resiliency over and above 200-year level of protection improvements. The Yolo Bypass improvements are also included for enhanced resiliency.The 200-year flows and stages with sea-level rise and climate change were developed using CVHS hydrology for planning purposes to compare multiple alternatives.	No
L_SJAFA2-02	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-4, Section 1.2 sidebar "Key Concepts of the CVFPP": the 4th bullet of "CVFPP Supporting Goals" describes "multi-benefit" as equivalent to Integrated Water Management (IWM). "Promote ecosystem functions" is listed as a separate goal with its own set of measurable objectives. We are glad that that this distinction is made between the separate goals of multi-benefit and ecosystem enhancement. However, we question why the synonymous term "multi-benefit" is needed, when IWM is an accepted term from the CWAP broadly used in water management planning. We suggest just using the term IWM to eliminate confusion. Throughout the remainder of the CVFPP, the term multi-benefit is inconsistently used and/or redefined. In many locations, especially related to the Conservation Strategy, the term multi-benefit seems to mean the same thing as the "co-equal goals" term used in the Delta Plan. If DWR elects to keep the term "multi-benefit" rather than replacing it with IWM then the report should be reviewed and edited to make sure the term is used consistently.	Please see response to Comment L_COL2-19.	No
L_SJAFA2-03	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-9, Table 1-2: should show the state investments separately in the Sacramento and San Joaquin Basins.	Noted. Information is shown for the entire Central Valley because information by basin was not readily available.	No
L_SJAFA2-04	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-10, 9th bullet: Reclamation Districts 404 and 17 are not "rural".	Please see response to Comment L_COL2-20.	Yes
L_SJAFA2-05	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-12: Please refer to SJAFA's October 21, 2016 letter (enclosed) to DWR commenting on proposed policies and suggesting two additional policies: "Climate Change Adaption" and "Liability".	No new policy issues were added. However, the residual risk management policy issue includes many recommendations related to climate change. A new sidebar on climate change adaptation was also included in Section 3.1.6. Please see response to Comment G_MSJRR1-04.	Yes
L_SJAFA2-06	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-13, Section 1.4: The 2012 Plan identified \$14-\$17 billion over 20-25 years, while the 2017 Plan totals \$17-\$21 billion over the next 30 years. There should be a discussion not only why the costs have increased but also why the time duration has increased. The total costs of all projects in progress/completed since 2012 should be identified in the 2017 and subsequent Plans to demonstrate progress to the general public/stakeholders. Also, it is unclear whether the time duration of the 2017 and subsequent Plans will be 30 years, or will it be shortened as projects are completed. If the 2017 and subsequent Plans continue to show increasing costs and more time, credibility with the general public/stakeholders could be an issue.	A detailed explanation and accounting for the increase in costs and extension of the planning horizon is included in the CVFPP Investment Strategy. Please refer to Section 5.1 of the Investment Strategy.	No
L_SJAFA2-07	San Joaquin Area Flood Control Agency	James Giottonini	P. 1-13, Figure 1-1: Funding in the Central Valley would be more informative.	Thank you for your comment. Data was only available for California as a whole. It is expected that data for the Central Valley would follow similar trends.	No

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L_SJAFA2-08	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-5, Draft Sacramento River Basin Channel Capacity Atlas: What about the San Joaquin River?	A San Joaquin River Basin channel capacity atlas is under development.	No
L_SJAFA2-09	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-8: The feasibility study of the Stockton urban area is scheduled to be submitted to the Civil Works Review Board in late 2017/early 2018.	Concur. Text revised to read: “A third feasibility study is being completed for the Stockton urban area and is scheduled to be submitted to the Review Board in November 2017.”	Yes
L_SJAFA2-10	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-15, Table 2-1: Would be helpful to define "floodplain". Much of the Central Valley is a historical "floodplain". Is the outcome to limit people in these historical "floodplains" or is it acceptable if the historical "floodplain" now has 100/200 year protection?	Please see response to Comment G_MUSR1-05. As stated in Section 3.2.1 of the 2017 CVFPP Update, the intended outcome is to reduce the chance of flooding while discouraging population growth in rural floodplains, with the intention of reducing aggregate flood risk.	Yes
L_SJAFA2-11	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-15, Table 2-1: Economic stability outcomes and associated metrics don't address the factors that typically contribute to the Disadvantaged Community (DAC) criteria used in DWR's cost sharing guidelines; factors such as poverty, low incomes, blight, and lack of development investment. In order to achieve and/or maintain economic stability, a level of flood protection needs to be achieved and sustained to eliminate this stressor.	Please see response to Comment L_COL2-21.	No
L_SJAFA2-12	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-17 and 2-18, Tables 2-3 and 2-4: These tables are very difficult to interpret if one is not the author. For instance, the titles of the DWR programs "Flood Management Planning" and "Floodplain Risk Management" are very similar, so an outsider would not know the difference. And the logic behind the ratings is not self-evident, nor is the significance of each rating. In fact, we are not sure what the tables are intended to demonstrate.	Please see response to Comment L_COL2-22.	No
L_SJAFA2-13	San Joaquin Area Flood Control Agency	James Giottonini	<p>P. 2-22, Section 2.3.2 "Perspectives on Land Use and Floodplain Management": It states that "Development in floodplains that can realize associated economic benefits remains an interest to some stakeholders, but can be difficult to achieve without intensification of risk." For the following examples no flood "projects" are needed so it is not difficult to achieve associated economic benefits from new development, but increased risk is still inevitable:</p> <p>a. if a non-urban area currently has 100-year protection, there are no restrictions on approving additional development as long as the population threshold does not exceed 10,000.</p> <p>b. if an urban area has 200-year protection, there are no restrictions on approving additional development.</p> <p>c. if an urban area has 100-year protection, there are no restrictions on approving additional development if the depth of flooding from a 200-year event is less than 3 feet.</p> <p>Is it the intent of the 2017 Plan to restrict local communities' land use authority to limit risk intensification, even if no "flood" projects are needed?</p> <p>In addition, a community should not be hindered from upgrading their flood protection (i.e. from 100-year to 200-year) because it will allow additional development. Consideration should be given for protecting existing residents/infrastructure/properties/evacuation routes. Likewise, new development, even in "deep floodplains", should be permitted as long as there is no increased risk to residents/properties. For example, if a community with 100-year flood protection wishes to upgrade their protection to 200-year, some limited development should be allowed such that the resultant risk to residents/infrastructure/properties/evacuation routes are no greater than existing.</p>	The State does not and cannot restrict local communities’ land use authority in the 2017 Plan. However, the State has an interest in managing aggregate risk. Please see response to Comment L_COL2-09. Please also refer to the land use and floodplain management issues described in Section 3.2.1 of the 2017 CVFPP Update.	No
L_SJAFA2-14	San Joaquin Area Flood Control Agency	James Giottonini	P. 2-24, Section 2.3.2: "Perspectives on Multi-Benefit Projects" is written using the perspective that multi-benefit is synonymous with ecosystem enhancement. The text needs to be consistent with the Section 1.2 "Key Concepts" sidebar, with particular focus on yielding water supply benefits, a critical need highlighted by the recent 5-year drought.	Please see response to Comments L_COL2-23 and L_COL2-19.	No
L_SJAFA2-15	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-5, Table 3-2, "Systemwide: Reservoir Storage and Operations": The San Joaquin BWFS technical evaluations showed that climate change will increase the 200-year flood peak at Vernalis from 125kcfs today to 339kcfs in the year 2064, and the only measure that makes a significant contribution to addressing this nearly 3x increase is a combination of 200TAF of new storage on the Merced River and 200TAF on the Tuolumne River. This should be included in the 2017 SSIA.	Please see response to Comment L_COL2-24.	No
L_SJAFA2-16	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-8, Map 3-1: Should add Hamilton City since it is mentioned in the Plan (P. 3-28) but not shown on any exhibits. Since both Lathrop and Manteca are "urban", they should be shown on the map.	Please see response to Comment L_COL2-10. Regarding Hamilton City, it is not protected by SPFC facilities.	Yes
L_SJAFA2-17	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-8 and 3-9, Maps 3-1 and 3-2: The "Number of Capital Investment Actions" is not very descriptive. For instance, is there any standardization for what "7 levee improvements" in the Lower San Joaquin and Delta South Region means? Does this represent 7 relatively standard-sized increments that can be compared to the 2 in the Upper San Joaquin Region? The inference is that the Lower SJ region has 3.5 times the levee improvements than the Upper SJ Region, but if compared based on recommended investment, the difference would be far greater.	Please see response to Comment L_COL2-26.	No

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L_SJAFCA2-18	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-10, Figure 3-3: Some of the ratings are difficult to understand, for instance, the Feather River - Sutter Bypass Multi-benefit Improvements project was described earlier as an undefined project to be formulated following implementation for the Yolo Bypass project, so how can this undefined project be rated? And the Paradise Cut expansion would divert an additional 10k cfs from the lower San Joaquin River, which is a minor fraction of the 200-year flood increase due to climate change, so how does it earn such a high rating for public safety?	Regarding Paradise Cut Bypass expansion, please see response to Comment L_COL2-27. The Feather River-Sutter Bypass Multi-benefit Improvement project ratings were based on the potential outcome estimated from the range of options studied in the Sacramento River BWFS.	No
L_SJAFCA2-19	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-12, Section 3.1.2: The Yolo Bypass multi-benefit discussion does not conform to the IWM definition of multi-benefit introduced in the Section 1.2 "Key Concepts" sidebar. This is also an issue for the Upper Elkhorn case study and Paradise Cut example. In all of these cases, the supporting goal of "promote ecosystem functions" is met, but not "promote multi-benefit projects".	Please see response to Comment L_COL2-28.	No
L_SJAFCA2-20	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-13, Table 3-3: What is the total cost and cost for the next 5 years for the Yolo Bypass multi-benefit improvements?	The total cost of the Yolo Bypass improvements is included in Chapter 5, Table 5.1 of the CVFPP Investment Strategy Technical Memorandum. Table 5-3 in the Investment Strategy outlines the estimated phasing of capital investments for the CVFPP over a 30-year timeframe divided into three phases.	No
L_SJAFCA2-21	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-15, Map 3-4: Should it be 200-year event with climate change and SLR?	The map reflects a 200-year event with only inland climate change. Sea-level rise was not included in this analysis.	No
L_SJAFCA2-22	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-18, "Paradise Cut Multi-benefit Improvements: what is the total cost and what are the improvements/cost for the next 5 years?	Please see response to Comment L_COL2-29.	No
L_SJAFCA2-23	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-20, Section 3.1.2: "Reservoir Management Actions" for the San Joaquin basin describes moving stored water to a groundwater bank and using the freed-up reservoir space to meet the primary goal of improving flood risk management. But while moving the stored surface water to groundwater storage may avoid reduction in water supply yield, it would not enhance it. In our view, this does not meet the supporting goal to promote multi-benefit projects, it merely mitigates against loss of water supply. Multi-benefit credit should only go to storage actions which improve water supply yield.	Please see response to Comment L_COL2-30.	No
L_SJAFCA2-24	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-21, Sidebar on "Wise Use of Floodplains": seems out of place.	“Wise Use of Floodplain” Sidebar was moved to Section 3.2.1 Improved Land Use and Floodplain Management.	Yes
L_SJAFCA2-25	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-22, "Emergency Management Actions": should explain "mitigation times".	Mitigation times are described in Section 4 of the 2017 CVFPP Update Scenario Technical Analyses Summary Report.	No
L_SJAFCA2-26	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-23: "Routine Maintenance: It is unclear what "under jurisdiction" and "responsibility" of the State mean.	Section 5.4.1 of the Investment Strategy Technical Memorandum clarifies that the State has responsibilities for SPFC facilities as defined in California Water Code Sections 8361 and 12878.	No
L_SJAFCA2-27	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-25, last bullet: Where are these "urban areas protected by non-SPFC levees ... (not under the CVFPP)"?	This language was included to be consistent with the 2012 CVFPP. Urban areas protected by non-SPFC levees exist Statewide in locations such as the San Francisco Bay Area.	No
L_SJAFCA2-28	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-30 and 3-31, Maps 3-6 and 3-7: The "Number of Management Actions" is not very descriptive. For instance, is there any standardization for what "116 public safety" actions in the Lower San Joaquin and Delta South Region means? Does this represent relatively standard-sized increments that can be compared to the 102 in the Upper San Joaquin Region? The inference is that efforts will be roughly equal in the two regions, yet the population protected in the Lower San Joaquin and Delta South region is far greater.	Please see response to Comment L_COL2-31.	No
L_SJAFCA2-29	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-33, "2017 Without Project Scenario": We agree that the Recommended Plan in the draft USACE Lower San Joaquin River Feasibility Study should not be considered a without project condition. However, the San Joaquin River BWFS takes a conflicting position.	Please see response to Comment L_COL2-32.	No
L_SJAFCA2-30	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-39, Map 3-9: The flows at Vernalis do not agree with the BWFS. For instance, the BWFS lists the 0.5% flows at 125kcfs and 339kcfs for current and 2064, respectively, for without project conditions, versus 86kcfs and 112kcfs shown on Map 3-9. This is a substantial difference. Also, the stage figures at Vernalis are not very useful because of the dampening effect of substantial overbank flows at that location. It would be more useful to show the flows and stages at Mossdale and Howard Rd.	Please see response to Comments L_COL2-33 and L_COL2-24.	No
L_SJAFCA2-31	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-41, Section 3.2.1 "Improved Land Use and Floodplain Management": should include the text of Executive Orders B-39-77 and B-30-15 in the report. Also, it states that "Urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety risks are held constant or reduced over time ..." But, Figure 3-8 shows that life loss increases over time for the Sacramento River Basin. We'd suggest that	For brevity, citing the executive orders was deemed to be sufficient. Please see responses to Comment L_COL2-34.	No

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			the policy language be modified to "Urban flood risk reduction investments under the SSIA will be structured to assure that the aggregate economic and life safety risks are held constant or reduced compared to 2017 without-project conditions."		
L_SJAFCA2-32	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-41, Section 3.2.3: The 2nd paragraph says "Current regulatory practices hinder the ability to recognize and obtain credit for benefits of improvements made early in a long-term program in order to offset impacts that may occur later in the program." This should be revised to "Current regulatory and funding practices hinder the ability to recognize and obtain credit for benefits of improvements made early in a long-term program in order to offset impacts that may occur later in the program." DWR grant funding guidelines currently require each project to yield multi-benefits and ecosystem enhancements, and there is no mechanism to apply credit from other projects in a program. DWR grant funding guidelines should be revised to recognize multi-benefits and ecosystem enhancements on a programmatic scale in the same manner suggested for permitting baselines.	Please see response to Comment L_COL2-35.	No
L_SJAFCA2-33	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-42 Section 3.2.4 "Operations and Maintenance of the Flood System": This section should also mention the need to assign O&M responsibility for the channel of the Paradise Cut bypass, as it is currently a gap. Similarly, the section should highlight the need to assign O&M responsibility for the natural river channels, so that the design capacities and profiles can be maintained.	Please see response to Comment L_COL2-36.	No
L_SJAFCA2-34	San Joaquin Area Flood Control Agency	James Giottonini	P. 3-44, Section 3.2.5 "Development of Multi-benefit Projects": The first paragraph says multi-benefit projects increase access to funding resources, and the second paragraph says multi-benefit projects are hindered by limited financial resources. These are conflicting statements.	Please see response to Comment L_COL2-37.	Yes
L_SJAFCA2-35	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-5, Section 4.1.3: Capital costs should be qualified for what they do and don't cover, and a note should be included to highlight that local agencies may have additional cost obligations for their other facilities. It appears that non-SPFC ecosystem and multi-benefit feature costs may have been added, but it is unclear whether non-SPFC levee costs have been included.	Please see response to Comment L_COL2-38.	No
L_SJAFCA2-36	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-4, footnote 1: San Joaquin County has not passed an assessment since 2012. SJAFCA, RD 1614, and RD 828 passed one in 2013, although SJAFCA is not an LMA. And TRLIA is listed, but is not an LMA.	Please see response to Comment L_COL2-39.	Yes
L_SJAFCA2-37	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-6, Table 4-2: The urban levee improvements in the San Joaquin are underestimated. The first cost for the USACE Recommended Plan is \$1.2 billion, or \$1.5 billion including interest to the midpoint of construction. Additional costs for the Bear Creek system, DWSC flanking prevention, RD 404, and RD 17 need to be added to that.	Table 5-1 in the Investment Strategy Technical Memorandum list the capital cost estimate for urban investments in the San Joaquin basin. Section 5.3.2 lists the projects included in the estimate. Appendix B of the Investment Strategy Technical Memorandum lists the specific projects, data set source, and cost estimates provided which were included in the overall urban San Joaquin improvement estimate. Effort was made to prevent overlap of estimates when data was provided by USACE as well as through the regional planning effort or other sources.	No
L_SJAFCA2-38	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-10, Section 4.2.1, 3rd paragraph: where is it discussed in Chapter 1 that current bond funding will be depleted by 2019?	The depletion of current bond funding was discussed on Page 1-14 of the 2017 CVFPP Update Public Draft.	No
L_SJAFCA2-39	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-20, Figure 4-10 "Ten-year Recommended Funding Actions for CVFPP": This graphic and the associated discussion lacks sufficient detail describing the near-term actions needed to support the assessment of viability of the proposed new funding mechanisms including the Sac/SJ Drainage District, River Basin Assessment and State Flood Insurance Program. More discussion of the specific near-term actions describing the assessment of the viability and evaluation of these mechanisms as well as the process for receiving stakeholder input is needed. The State should receive comment and finalize the supporting CVFPP Investment Strategy technical memorandum and its recommendations and incorporate the recommended near term actions into the CVFPP.	Please see response to Comment L_COL2-46.	No
L_SJAFCA2-40	San Joaquin Area Flood Control Agency	James Giottonini	PP. 4-29 to 4-44, Section 4.5.1, “Recommendations for Flood Management Policy Issues”: please refer to our letter of October 21, 2016 (enclosed) in which we suggested two additional policies: “Climate Change Adaptation” and “Liability”, and provided input to the other policies.	Please see response to Comment L_SJAFCA2-05.	No
L_SJAFCA2-41	San Joaquin Area Flood Control Agency	James Giottonini	PP. 4-30, “Recommendations for Land Use and Floodplain Management”, 2nd bullet: The state should not take administrative actions just “to ensure consistency of State floodplain management policies with federal policies”. There are many reasons for the State to differ with federal policies on a number of issues (health insurance, immigration, climate change, etc.)	Please see response to Comment L_COL2-40.	Yes
L_SJAFCA2-42	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-33, “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”: This policy should be broadened to seek recognition of programmatic gains in life safety, property damage, ecosystem uplift, and integrated water management, so that individual projects are not conditions to achieve these goals. Programmatic crediting should be applicable to both regulatory and funding decisions and actions.	Please see response to Comment L_COL2-41.	Yes
L_SJAFCA2-43	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-34, “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”: Last bullet should also call for tracking land subsidence over time.	Please see response to Comment L_COL2-42.	Yes

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L_SJAFCA2-44	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-34, “Recommendations for Operations and Maintenance of the Flood System”: This policy needs to also include a bullet for establishing responsibility for maintenance of the Paradise Cut channel and natural river channels of the SPFC so that hydraulic design performance (currently 1955 and 1957 profiles) can be maintained.	Please see response to Comment L_COL2-43.	No
L_SJAFCA2-45	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-35, “Recommendations for Development of Multi-Benefit Projects”: This should be modified to reflect a goal for multi-benefits programs, not projects, consistent with the “Recommendations for Hydraulic and Ecosystem Baselines and Program Phasing”.	Please see response to comment L_COL2-35.	No
L_SJAFCA2-46	San Joaquin Area Flood Control Agency	James Giottonini	P. 4-35 “Recommendations for Development of Multi-Benefit Projects”: Most of the bulleted recommended actions are written to address the goal of Promote Ecosystem Functions, which is a different supporting goal of the CVFPP, as described in Section 1.2. The action list should focus on integrated water management, which are highlighted in the final 2 bullets of the list.	Please see response to Comment L_COL2-19.	No
L_SJAFCA2-47	San Joaquin Area Flood Control Agency	James Giottonini	<p>P. 4-40, "Recommendations for Funding":</p> <p>a. Under Recommended Actions, 1st Bullet - Suggest revising the text as follows: "Continue to closely coordinate with State and Local agencies, to generate State funding and support for CVFPP's flood investments." The State has recognized already that the new funding sources, in particular the proposed reutilized SSJDD and River Basin Assessments, are effectively additional dollars from the direct local beneficiaries of the CVFPP. Therefore, there must be close coordination with those stakeholders;</p> <p>b. Second sub-bullet: - Suggest revising the text as follows: "Evaluate the viability and effectiveness to Reutilize the Sacramento and San Joaquin Drainage District (S/L). The Sacramento and San Joaquin Drainage District is currently in the Water Code to fund capital projects. It has been nearly 80 years since this district generated funds. In the immediate near-term (next 1 to 2 years), the viability of the district to conduct assessments should be evaluated by DWR. A thorough evaluation that involves local stakeholder input and covers topics such as benefit, economics, capacity and legal constraints should be completed. This analysis should conclude what, if any, level of assessment is viable and what legislative changes are necessary to allow revenue generated to be used for O&M and capital projects. The CVFPP funding plan assumes \$26M/year potential revenue could be generated from this mechanism beginning in approximately 2020." The CVFPP should provide more specific near-term recommendations and address the next steps consistent with the conclusion of Investment Strategy Technical memorandum. Further, because of the delay of the Investment Strategy Memorandum's release, the Final CVFPP should be released only after comments and updates to the Investment Strategy memorandum are received and finalized respectively.</p> <p>c. Third sub-bullet: - Suggest revising the text as follows: "Evaluate the viability and effectiveness to establish a State river basin assessment (S). IWM is the focus of this type of assessment, and the State should develop a watershed approach to managing and funding projects. For example, a river basin assessment would return money to the watershed, to be shared across the IWM activities which would include management actions reflect in the CVFPP. The DWR should develop criteria, in coordination with local stakeholders, for the evaluation of the viability and effectiveness of this potential funding mechanism to meet the needs of the CVFPP funding plan that assumes \$5M/year potential revenue from this mechanism beginning in Phase 2." Similarly, as noted above, the CVFPP should provide more specific near-term recommendations and address the next steps consistent with the conclusion of Investment Strategy Technical memorandum.</p> <p>d. Fourth sub-bullet: - Suggest revising the text as follows: "Evaluate the viability and effectiveness to establish a State flood insurance program (S). Following the evaluation of the statewide flood insurance as described in the floodplain and land use management recommendations, a new approach to insurance could potentially generate funds to reduce flood risk while providing the same level of financial protection as offered by the NFIP. The CVFPP funding plan assumes that \$15M/year of potential revenue from this mechanism could begin in Phase 2. A state flood insurance program could use a portion of the premiums to reduce flood risk by contributing funds for flood management system repairs, improvements, and flood risk mapping and notification. Another version of this could be a local basin-wide insurance program. This could potentially be a companion program with a Statewide Flood Insurance Program. Any new program should also consider insurance for agricultural properties. All of these potential uses of funds from a State insurance program would need to be further evaluated. Criteria for the evaluation should be developed in close collaboration with the impacted stakeholders.</p>	Please see response to comment L_COL2-47.	Yes
L_SJAFCA2-48	San Joaquin Area Flood Control Agency	James Giottonini	General: The spending and funding plans are very ambitious, and it is probable that it will not be possible to implement all of the funding mechanisms to achieve all of the plan goals and features. As currently written, the plan is not clear on how the state will prioritize actions and spending in each Phase. It is our view that actions which address the primary goals of the plan (Improve Flood Risk Management) should be the first priority for spending, and that spending to accomplish supporting goals should be secondary. At present, state funding for critical public safety improvements is conditioned on accomplishing supporting goals on a project by project basis.	Please see response to comment L_COL2-48.	No

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L_SJAFA2-49	San Joaquin Area Flood Control Agency	James Giottonini	General, Sediment Dynamics in the San Joaquin River: This significant issue is not acknowledged in the Draft 2017 CVFPP Update. We recommend that the document both acknowledge the issues and express the intent to carry out a basin-scale investigation to address information gaps and apply the resulting understanding to the refinement of the CVFPP in the 2022 Update.	Please see response to comment G_MSJRR1-02.	Yes
L_SJAFA2-50	San Joaquin Area Flood Control Agency	James Giottonini	General: SJAFA has also provided written comments on the San Joaquin River BWFS dated November 23, 2016. To the extent that those comments result in revisions to the BWFS, we would anticipate that the changes would also need to be reflected in the CVFPP.	Comment noted.	No
STATE COMMENTS					
S_DFW2-01	Tina Bartlett	Department of Fish and Wildlife	<p>The California Department of Fish and Wildlife (Department) has reviewed the Draft Central Valley Flood Protection Plan 2017 Update (CVFPP) from the California Department of Water Resources (DWR).</p> <p>The CVFPP 2107 Update is a direct result of a multi-stakeholder communication and engagement process, which has brought to the table a diverse group of stakeholders with interests related to flood management in the Central Valley to refine a common vision. In particular, the Department would like to acknowledge the collaborative working relationship that DWR has developed and sustained with the Fish and Wildlife Agencies. Multi-stakeholder involvement and coordination is an important strategy in the development of such large scale plans as the CVFPP, especially in light of the number of policy issues, and jurisdictional and institutional coordination needs. The Department believes that by including stakeholders in the process for the development of the CVFPP and its updates, that DWR increases the likelihood of a more coordinated implementation of site specific projects in the future.</p> <p>The Department encourages DWR to seek establishment of an implementable framework to facilitate design and construction of multi-benefit projects that addresses funding, interagency collaboration, regulatory mechanisms, long-term O&M, mitigation, and tools and methods for monitoring and tracking progress toward ecosystem vitality, economic stability, and other societal benefits. The Department also recognizes that the 2017 update of the CVFPP contains listed recommended actions for this policy-related issue which directly align with Delta ecosystem conservation needs, and this should also help facilitate implementation efforts.</p> <p>The Department supports the 2017 update CVFPP planning process, which reflects a greater emphasis on comprehensive, multi-benefit activities that can achieve lasting and measurable outcomes and advance riparian and floodplain ecosystem conservation (through protection, enhancement, restoration, and long-term management). Integrating flood management and conservation wherever possible will definitely help to address the growing need from societal and regulatory perspectives as we balance the evolving land use status in the Central Valley (and the Delta).</p>	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
S_DFW2-02	Tina Bartlett	Department of Fish and Wildlife	Conservation Plans: HCPs & NCCPs: The Department recommends close coordination and collaboration with local plans that overlap with this CVFPP. The Department also encourages DWR to discuss how implementation of this plan may contribute to the implementation of other local plans. The CVFPP is located within several Habitat Conservation Plan (HCP) or Natural Community Conservation Plan (NCCP) plan areas, including the Yuba Sutter Regional Conservation Plan, Butte Regional Conservation Plan, Placer County Conservation Plan, Feather River HCP, Natomas Basin HCP, and South Sacramento HCP. More information is available online at: https://www.wildlife.ca.gov/Conservation/Planning/NCCP .	DWR has performed extensive outreach and coordination with regional conservation planning efforts, especially in development of the Feather River HCP. Where appropriate and feasible, DWR will continue to track and coordinate with existing HCPs and NCCPs as it pursues the State Systemwide Investment Approach in the 2017 CVFPP, implements a tracking system for outcomes of these activities, and updates the Conservation Strategy and Appendix J (Existing Conservation Objectives from Other Plans) as part of the 2022 CVFPP Update.	No
S_DFW2-03	Tina Bartlett	Department of Fish and Wildlife	<p>Central Valley Flood Protection Plan Conservation Strategy: It is vital for the CVFPP to demonstrate consistency and integration with the Central Valley Flood Protection Plan Conservation Strategy (CVFPPCS). The Department commends DWR for designating the CVFPPCS, which offers goals and ecological objectives targeting improving river and floodplain processes, habitats, species and reducing stressors to advance integrated conservation and flood management projects, as a companion plan to the CVFPP.</p> <p>As a companion plan, the CVFPPCS provides a comprehensive approach to implement the CVFPP and its environmental objectives to: 1) Promote natural dynamic hydrologic and geomorphic processes, 2) Increase and improve the quantity, diversity, and connectivity of riparian, wetland, floodplain, and shaded riverine aquatic habitats, including the agricultural and ecological values of these lands, and 3) Promote the recovery and stability of native species populations and overall biotic community diversity.</p> <p>The CVFPPCS identifies long-term measurable objectives that will be used to guide and inform the planning, funding and implementation of multi-benefit and strategic advance mitigation projects within the Central Valley Flood System.</p>	Thank you for your feedback.	No
S_DFW2-04	Tina Bartlett	Department of Fish and Wildlife	Public Lands: The CVFPP area includes valuable habitat for fish and wildlife resources, including riparian habitat corridors, located within and near several Department wildlife management areas and other public lands. The CVFPP Update and its Supplemental Program Environmental Impact Report should discuss how DWR will: ensure that future site specific projects are not inconsistent with applicable policies, procedures, and goals of the management plans within public-owned areas; analyze how future site specific projects will impact habitat values	The 2017 CVFPP is a programmatic level descriptive document, and as such is not a funding or permitting decision for specific projects. Discussion of project-specific impacts to habitat values will be analyzed and discussed as part of project level analysis.	No

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			on nonpublic lands to ensure riparian corridor ecosystem function (including riparian forest restoration); and ensure that future site specific projects conserve the heritage of outdoor recreation (including hunting and fishing) along the levee systems.		
S_DFW2-06	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: General comment in regards to habitat restoration. Restoring habitat is beneficial not only to TE species but to others such as deer and turkey. Adjacent landowners that have properties that are to keep such animals away from their agricultural crop would most likely be impacted. The potential exists for depredation permits to be issued to remove animals that we created the habitat for. Solution/Suggested Fix: CDWF requests that a discussion be added in to the document regarding the increased chances for private landowners to need to deal with possible “nuisances” on their property due to restoration projects surrounding private property.	Concur. Revised Page 3-44 to read: “In addition, agricultural stakeholders and landowners have expressed concerns over the potential impacts of attracting species, endangered species in particular, on or near private lands as a result of habitat restoration.”	Yes
S_DFW2-07	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: The detailed 2017 CVFPP Conservation Strategy companion plan offers goals and ecological objectives targeted on river and floodplain processes, habitats, species and stressors to advance integrated conservation and flood management projects. The outlined integrated flood risk management and multi-benefit conservation approaches and recommendations for implementation and related regulatory compliance and regional permitting are useful tools for integrated conservation across the state, especially in the Delta. Solution/Suggested Fix: Positive comment, no solution required.	Thank you for your feedback.	No
S_DFW2-08	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: The CVFPP 2107 Update’s main goal is to improve flood risk management with supporting goals that promote riparian and floodplain ecosystem functions and multi-benefit projects, and focus on improving operations and management and institutional support. These supporting goals directly align with goals for sustained Delta ecosystem conservation and management. It will be beneficial to have high-level alignment across flood management and conservation goals and strategies whenever possible to achieve multi-objective outcomes. Solution/Suggested Fix: Positive comment, please retain these supporting goals and alignment with other management plans.	Thank you for your feedback.	No
S_DFW2-09	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: Graphic about Climate Change Considerations for CVFPP. This graphic discusses the federal policy and technical guidance. Solution/Suggested Fix: CDFW requests that this graphic and discussions about climate change be revised to consider both the State and Federal policies on the issue. Top paragraph	The following footnotes have been added to Section 2.1.1, page 2-4: 1 Governor Brown’s Executive Order B-30-15 and Assembly Bill 1482, require State agencies to account for climate change in project planning and investment decisions. 2 Executive Order 13690 applies to Federal actions such as Federal grants used for repair and rehabilitation after a disaster.	Yes
S_DFW2-10	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: Top paragraph on the page, discusses use of the Conservation Strategy to inform the regional flood management plans. Last sentence states that the “...Strategy may continue to inform future phases of RFMP...” Solution/Suggested Fix: CDFW recommends that DWR change the word ‘may’ to ‘will’ to make this a stronger statement, and reflect this sentiment throughout the document where applicable.	Concur. The sentence in Section 2.1.2 of the 2017 CVFPP Update on page 2-11 has been revised to read: “The Conservation Strategy will continue to inform future phases of RFMP development as funding and other resources allow.”	Yes
S_DFW2-11	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: The CVFPP 2107 Update is the result of a multi-stakeholder communications and engagement process, bringing to the table many stakeholders with interests related to flood management in the Central Valley to refine a common vision. Multi-stakeholder involvement and coordination is an important strategy to take, especially in light of the number of policy issues, and jurisdictional and institutional coordination needs. This broader, inclusive planning approach could result in an increased likelihood of more coordinated implementation of multi-benefit projects. Solution/Suggested Fix: Positive comment, please retain this approach in future updates.	Thank you for your feedback.	No
S_DFW2-12	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: Last paragraph (Draft Basin-Wide feasibility Studies) discusses “multi-benefit options” and “ecosystem restoration”. In the Draft Basin-Wide Feasibility Study (Study) Yolo Bypass is an area of focus and the Study mentions benefits of salmon rearing on agricultural lands in Yolo Bypass. While there is a benefit for juvenile salmon rearing In a flooded Yolo Bypass, managed flooding of agricultural fields is not equivalent to ecosystem or habitat restoration. Solution/Suggested Fix: CDFW recommends using the “Prioritization and Partitioning” tools developed in Appendix I (Floodplain Restoration Opportunities Analysis) for the 2016 draft Conservation Strategy. This appendix outlines what restored floodplain habitat constitutes. Agricultural areas are generally defined as areas of “moderate” priority and we would suggest that conservation measures within these areas are referred to as “wildlife friendly farming” or “wetland Management” and not ecosystem or habitat restoration.	DWR acknowledges that managed flooding of agricultural fields provides less ecological benefits than full-scale habitat restoration. The Sacramento BWFS multi-benefit options include a combination of wildlife friendly farming and habitat restoration within levee setback areas. Therefore, the terms “multi-benefit options” and “ecosystem restoration” are appropriate in this context.	No
S_DFW2-13	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: 3rd bullet. Says they will increase opportunities for recreation. Solution/Suggested Fix: CDFW recommends including examples how DWR will improve recreation. CDFW recommends these include new parking lots, new trails, etc.	The additional recreation opportunities listed on Page 3-37 include hiking, wildlife viewing, fishing, and hunting. The BWFSs did not design specific recreational facilities, which would be done in later stages of planning. Recreational benefits were estimated based upon average visitor-days per acre for similar recreation activities and opportunities provided at National Wildlife Refuges (NWRs) in California. Please read the San Joaquin BWFS Appendix 20 Open	No

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				Space and Recreation and Appendix K Sacramento River BWFS: Yolo Bypass Multi-benefit Economic Analysis for more details on recreation benefits.	
S_DFW2-14	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: Example/Discussion box about “The Challenges of Conflicting Objectives” discusses the challenges that DWR has had with GGS and WYBC, which is a valid topic. However the text provided only discusses the problems, and provides no suggested solutions. Therefore, this is not a productive way to address the issue.</p> <p>Solution/Suggested Fix: CDFW suggests that instead of stating the problems, maybe give examples of success and how multi- benefit projects can be achieved. Use this as an opportunity to highlight some existing advanced mitigation projects, or other multi-benefit projects that DWR has participated in.</p>	These examples are highlighted as specific issues to help draw attention to areas where resources and collaborative efforts are needed so the desired outcomes of the multi-benefit approach can be realized. DWR has repeatedly urged both in the CVFPP, through letters on various rulemakings and through other actions, that a dialogue occur regarding how to reconcile these types of conflicts can be resolved, so that together we can move forward to achieving the primary and supporting goals of the CVFPP and also more easily implement multi-benefit projects.	No
S_DFW2-15	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: The CVFPP Climate Change Analysis Technical Memorandum outlines climate change analyses that computed potential changes in unregulated flows throughout the Central Valley based on newer climate projections and refined hydrologic modeling and was applied to the CVFPP. These results inform the final hydraulic, flood damage, and life risk analyses that quantify estimates of the expected outcomes from the CVFPP. The recommended actions relative to residual risk management point to establishment of a climate change task force and related vulnerability assessment at a system scale to assess the extent of flood system capacity into the future. These types of initiatives and analyses closely align with efforts needed to guide ecosystem conservation efforts.</p> <p>Solution/Suggested Fix: Positive comment, please retain.</p>	Thank you for your feedback.	No
S_DFW2-16	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: Underfunding and complex, time-consuming permits lead to a backlog of deferred maintenance and greater risk to life and property. The recommended actions to address this include working toward securing sufficient and reliable annual funding for proper long-term operations and maintenance, and supporting a framework for regional conservation and efficient regional-scale permitting strategies for long-term O&M activities. The outline recommendations closely reflect the needs for conservation related projects that also suffer from a lack of reliable long-term funding for implementation, and conservation area long-term operation and management. It also speaks to existing permitting challenges and direct parallels with regard to conservation project permitting.</p> <p>Solution/Suggested Fix: Positive comment, please retain.</p>	Thank you for your feedback.	No
S_DFW2-17	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: Ineffective institutional frameworks have hindered implementation of multi-benefit actions. A near-term milestone is to seek establishment of an implementable framework to facilitate design and construction of multi-benefit projects that addresses funding. Inter-agency collaboration, regulatory mechanisms, long-term O&M, mitigation, and tools and methods for monitoring and tracking progress toward ecosystem vitality, economic stability, and other societal benefits. The listed recommended actions for this polity related issue again directly align with Delta ecosystem conservation needs, in particular regarding incentivizing multi-benefit projects, regional-scale and long-term permitting mechanisms for implementation and multi-benefit project maintenance, stakeholder collaborations and advancing the implementation of safe harbor agreements, and support adaptive management of multiple benefits.</p> <p>Solution/Suggested Fix: Positive comment, please retain.</p>	Thank you for your feedback.	No
S_DFW2-18	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: Overlapping authorities and conflicting mandates can complicate flood system improvements and maintenance, and are partially the result of existing governance structures, which are inadequate to support the broad range of actions included in the CVFPP. The recommended action to continue a dialogue between federal, State and local agencies with responsibilities for public safety, resource management, and permitting to reconcile differing regulatory frameworks directly overlaps with what is needed in the ecosystem conservation context.</p> <p>Solution/Suggested Fix: CDFW agrees that we need to continue with the existing coordination, collaboration and communication exchange between local, state and federal entities to find ways to achieve the goals and objectives of the CVFPP and its companion plan the CVFPPCS, in a way that is productive for all involved.</p>	Thank you for your feedback.	No
S_DFW2-19	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: The CVFPP 2017 Update recognizes the need for a long-term evaluation of the flood management system in light of climate change and other drivers of change. It highlights the use of Integrated Water Management as a systems approach that reinforces the Interrelation of different water management components with the understanding that changes in the management of one component will affect the others and promotes system flexibility and resilience to accommodate changing conditions. Conservation and reestablishment of ecosystem processes in riparian areas and floodplains, as wise land use, offer multi-benefits as key drivers for ecosystem resilience, and serve to reduce flood-related risks to Infrastructure and lives. Reestablishments of ecosystem processes are also a major conservation focus of the Delta Conservation Framework being led by CDFW.</p> <p>Solution/Suggested Fix: Positive comment, please retain.</p>	Thank you for your feedback.	No
S_DFW2-20	Tina Bartlett	Department of Fish and Wildlife	<p>Issue/Comment: Rather than focusing on incremental, single-purpose flood management investments, the CVFPP planning process reflects a greater emphasis on comprehensive, multi-benefit activities that can achieve lasting and measurable outcomes and advance riparian and floodplain ecosystem conservation (through protection, enhancement, restoration, and long-term management). This is an important “win-win” strategy that will not be</p>	Thank you for your feedback.	No

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			possible across the board, yet integrating flood management and conservation wherever possible will address the growing need from societal and regulatory perspectives as we balance the evolving land use status In the Central Valley (and the Delta). Solution/Suggested Fix: Positive comment, please retain this approach In future updates.		
S_DFW2-21	Tina Bartlett	Department of Fish and Wildlife	Issue/Comment: Table 3.2: Expansions of Yolo Bypass and Sacramento Bypass may provide benefits to fish and wildlife resources – especially if the new areas are restored to a more natural flood plain. However, any weir expansions will likely result in increased fish stranding and/or passage delays. Solution/Suggested Fix: Any weir expansions in Yolo Bypass/Sacramento Bypass should include an analysis of fish stranding and passage delays, and provide appropriate solutions to identified problems. Any improvements in the bypasses should be designed to reduce fish stranding issues.	Thank you for the comment. These are important considerations that will be studied and evaluated in more detailed, project-level stages of planning.	No
S_DOT1-01	Eric Fredericks	Department of Transportation District 3	Cal trans commends the California Department of Water Resources (DWR) for completing the 2017 Update of the Central Valley Flood Protection Plan (CVFPP) and including the study of the Conaway Levee Setback and Transitory Storage as part of the Plan.	Thank you for your feedback.	No
S_DOT1-02	Eric Fredericks	Department of Transportation District 3	The concept of the Conaway Levee Setback and Transitory Storage is supported by the City of Woodland, the City of Davis, Yolo County, Reclamation District (RD) 2035, the Sacramento Area Flood Control Agency (SAFCA) and Conaway Ranch. The copies of support letters from all of these agencies were shared with the DWR and the Central Valley Flood Protection Board. The proposed study is also recommended and endorsed by the Lower Sacramento River/Delta North Regional Flood Management Plan. Overall, we are satisfied that further study of this concept is now included in the 2017 Update of the CCVFPP. However, we feel that it would be better if the proposed project is also mentioned on page 3-5 under System-wide Reservoir Storage, as well as on page 3-21 under Floodplain Storage Actions. We agree with the language suggested by RD 2035. That language is attached for your consideration.	Please see response to Comment L_RD20351-02	No
S_DOT1-03	Eric Fredericks	Department of Transportation District 3	We still are of the position that if the Levee Setback Project were to precede the Cache Creek flood risk improvement projects, it could further exacerbate the impacts to I-5 in an extreme Cache Creek flood event. Both projects must be implemented and impacts to I-5 be strongly considered in prioritization of necessary improvements.	Impacts to I-5 may be studied as part of project-level planning as this action moves towards implementation.	No
S_DPC1-01	Skip Thomson	Delta Protection Commission	The Delta Protection Commission (Commission) appreciates the opportunity to provide comment on the draft 2017 Update to the Central Valley Flood Protection Plan (2017 CVFFP Update) written by the Department of Water Resources (DWR) for the Central Valley Flood Protection Board (CVFPB). The associated supplemental Programmatic Environmental Impact Report (PEIR) has also been reviewed by Commission staff. The CVFPP outlines the State’s approach to reducing flood risk to areas protected by the State Plan of Flood Control (SPFC), including approximately 380 levee miles in the legal Delta. It includes recommendations on policies and financing that aim to support comprehensive flood risk management actions. The draft 2017 CVFPP Update that DWR prepared for CVFPB was developed in close coordination with State, federal, and regional partners, and informed by a multi-year stakeholder engagement process.	Thank you for your feedback.	No
S_DPC1-02	Skip Thomson	Delta Protection Commission	Overall, both the 2012 CVFPP and draft 2017 CVFPP Update encourage land use planning practices that reduce the consequences of flooding. This is explained in Section 3.1.3 (The Urban Portfolio) and DWR’s description of how “Limiting Flood Exposure Contributes to Greater Sustainability” (page 3-32). Not allowing new development in the statutory Delta’s primary zone is consistent with LURMP Policies Levees P-1, Land Use P-1 and P-2, and Agriculture P-9 (see LURMP Policy table at end of letter for full text). It would be helpful to display the Primary and Secondary zones in Map 2-1 since Flood Management Planning in the statutory Delta will be need to show consistency with the Land Use Resource Management Plan and Delta Plan. Such long-range and multi-county planning documents like these are not a part of the planning landscape in other parts of the SPFC. There is a delicate balancing to ensure that new flood protection does not result in the intensification of risk on lives and assets in the floodplain protected behind levees. On the same side, not having protection is placing a financial burden on the Delta’s land owners. Non-structural measures (such as flood proofing buildings) may be viable options, but they have a direct financial impact on local property owners and small communities. Some owners are discouraged from making any investments in new buildings unless they obtain a higher level of flood protection to protect their investments. Grant programs such as the Small Communities Flood Risk Reduction Program should continue to be supportive of giving grants to small communities and rural areas of the Delta to support local Delta economies as well as cultural heritage and agritourism improvement efforts.	Map 2-1 focuses on the 6 RFMP locations. A map of the Primary and Secondary Zones of the Delta have been added to the text box “Collaboration with Delta Levee Investment Strategy” in Section 4.2.1. In addition, the CVFPP focuses on reducing flood risks on lands protected by the SPFC, including those in the Delta. Approximately one-third of the Delta’s levee system is part of the SPFC and thus is included in the CVFPP. Responsibilities for flood management in Delta areas outside the SPFC reside with a variety of local agencies and are supported by various State, federal, and local efforts (e.g., the State’s Delta Special Flood Projects Program and Delta Levees Maintenance Subventions Program, Delta Plan development). The CVFPP is one of many programs that could contribute to achievement of the management goals included in the Delta Stewardship Council’s Delta Plan. The goals of the CVFPP support the Delta Plan’s goals of improving water supply reliability and restoring the Delta ecosystem. The Delta Plan is a management plan that will include policies and recommendations, but no specific projects. As part of the development and implementation of the CVFPP and future updates, the Board and DWR will continue to work collaboratively with local, State, and federal agencies, environmental interests, and other parties.	Yes
S_DPC1-03	Skip Thomson	Delta Protection Commission	We encourage the continued use of Advisory Groups as ways that DWR and CVFPB can effectively reach out to those who live, work and recreate in the Delta, consistent with Vision 2030 Strategic Objective O.1 (“Ensure consistent, proactive communication between and among Delta interests and decision makers”). The successes of the 2016 Conservation Strategy Advisory Group are applauded and much appreciated.	Thank you for your feedback. As DWR and the Board works to implement the CVFPP and work towards developing the 2022 CVFPP Update, we are considering continuing the use of the Advisory Group structure. As we move to post-2017 CVFPP Update adoption, this approach will be clarified and refined.	No

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S_DPC1-04	Skip Thomson	Delta Protection Commission	<p>The draft 2017 CVFPP Update includes substantially more detailed descriptions of potential systemwide improvements for areas like Yolo Bypass (pages 3-12 to 3-13) and Paradise Cut (pages 3-18 to 3-19). The Central Valley Flood Protection Act of 2008 (SB 5) sets legislative direction to include multiple objectives, where feasible, when proposing improvements to flood management facilities, including opportunities and incentives for expanding or increasing the use of floodway corridors (Water Code Section 9616(a)(12)). Especially in Paradise Cut, large setback levees are proposed which will change the nature of local agriculture. Lands deemed unsuitable for agriculture once on the waterside of the levee system will need to have ownership responsibilities clarified.</p> <p>If not suitable for agriculture, the newly floodprone land should be considered for conversion to a recreation or tourism land use, where it could provide local jobs, support local businesses, and provide local tax revenue. Future planning for these two systemwide improvement areas, when located in the statutory Delta, should be oriented towards making the land economically viable in order to support of Land Use Policies Agriculture P-4 and P-7, Recreation & Access P-6, and Natural Resources P-5 and P-8.</p>	<p>Thank you for your comment. Through the technical work conducted by both the Sacramento and San Joaquin River BWFS, DWR was able to include more detailed information for both the Yolo Bypass and Paradise cut. A more specific site plan and land use designations would be refined with further project-level planning and analysis in coordination with local stakeholders. As for all projects, more technical analysis and coordination with local and regional stakeholders is needed for implementation.</p> <p>The CVFPP focuses on reducing flood risks on lands protected by the SPFC, including those in the Delta. Approximately one-third third of the Delta’s levee system is part of the SPFC and thus is included in the CVFPP. The CVFPP is one of many programs that could contribute to achievement of the management goals included in the Delta Stewardship Council’s Delta Plan. The goals of the CVFPP support the Delta Plan’s goals of improving water supply reliability and restoring the Delta ecosystem. The Delta Plan is a management plan that will include policies and recommendations, but no specific projects. As part of the development and implementation of the CVFPP and future updates, the Board and DWR will continue to work collaboratively with local, State, and federal agencies, environmental interests, and other parties.</p>	No
S_DPC1-05	Skip Thomson	Delta Protection Commission	<p>As required by the 2008 Central Valley Flood Protection Act, the 2012 CVFPP considered three alternative approaches to reducing flood risk to the SPFC. Elements from each of these three alternatives were combined in a State Systemwide Investment Approach (SSIA). The estimated cost of the 2012 SSIA was between \$14 to \$17 billion over 20 to 25 years for full CVFPP implementation.</p> <p>Based on extensive input from local agencies and detailed studies, the updated SSIA is now estimated at \$17 to \$21 billion over the next 30 years. This includes up to \$16.7 billion in one-time capital costs and annual investments of \$120 to \$280 million for on-going operational costs over 30 years (Table 4-5 in the draft 2017 CVFPP Update). Current funding sources are inadequate to meet the needs and could only provide \$4 to\$5 billion toward CVFPP implementation over the next 30 years. In addition, the existing annual funding shortfall for overall operation and maintenance of the project levees is estimated at \$100 million.</p> <p>We would encourage the use of unequivocal language in Central Valley Flood Protection Plan Investment Strategy and the 2017 CVFPP Update supporting the long-term continuation of the DWR Delta Levees Subventions Program (Water Code 12980-12995). This language is in support of our Vision 2030 Strategic Objective L.2 (“Advocate for reliable funding for Delta levee maintenance and improvements”) and LURMP Policies Levees P-6 and P-8. DWR’s planning should not result in a larger gap between what is necessary for the proper maintenance of the levees from what is currently set aside for the program from both General Fund and Proposition 1 funding sources.</p>	<p>The investment strategy envisions the Delta Subventions and Delta Levees Special Projects Programs as the delivery mechanisms for State funding generated by either State General Fund or State GO Bonds for Delta levees and projects. The Delta Subventions Program is covered more robustly in Chapter 8 of the Draft CVFPP Investment Strategy.</p>	No
S_DPC1-06	Skip Thomson	Delta Protection Commission	<p>Many of the Delta’s reclamation districts struggle to garner landowner support for new assessments which support their own O&M needs or improvements projects. The proposal for new state fees is of concern to the Commission and Delta interests. Imposing additional fees on landowners can impair the ability of reclamation districts to levy and collect future assessments since many rural landowners are operating on tight margins. The Central Valley Flood Protection Plan Investment Strategy spoke about the challenges of obtaining voter approval (Section 4.6 on page 4-13). When agricultural reclamation districts do not have local funds, then they cannot participate in state-sponsored flood management actions. Continually being “skipped over” in favor of urban areas that do have the ability to collect funds only deepens the problem.</p> <p>There needs to be a larger consensus-building process with local agency officials and agricultural interests on how to implement a new fee structure in rural areas, as discussed in the Commission’s recommendations in our proposed levee financing feasibility study. The Central Valley Flood Protection Plan Investment Strategy recognized that Proposition 218 imposes many restrictions on reclamation districts to raise money locally (Section 4.8). The 2017 CVFPP Update did recognize the need for reform (page 4-42), but the Commission is asking for an additional commitment not to make substantial changes to levee program financing until the Proposition 218 constraints are addressed.</p>	<p>DWR and the CVFPB will work together with stakeholders to further explore and evaluate potential new funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. Funding is one of the 8 top policy issues to be addressed through a transparent and collaborative effort.</p>	No
S_DPC1-08	Skip Thomson	Delta Protection Commission	<p>The potential for enhancing recreational use of a flood control system has been recognized by the federal government as they approve changes to project levees. While access to these public trust resources has been degraded in some locations in the intervening decades, many still remain in the Delta and new possibilities will arise as the 380 levees miles of project levees are improved. Developing outdoor recreational, environmental, agricultural and cultural tourism in the legal Delta will be consistent with LURMP Policy Recreation & Access P-4.</p> <p>The Commission would like to see the Great California Delta Trail supported in locations next to major highways and urban areas. Multi-benefit levee projects along State Highway 160 should be included in the 2017 CVFPP Update as a policy-guidance for future funding programs. In addition, the Investment Strategy should allow funding from other sources to support recreation that is compatible with a project’s flood control purpose when supported by the local land use authority.</p>	<p>The 2017 CVFPP is a higher-level policy document and does not contain specific actions like expansion of the Great California Delta Trail or along recreational facilities along State Highway 160. However, opportunities to implement projects that provide recreation benefits are broadly supported in the 2017 CVFPP Update.</p>	No

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S_DPC1-09	Skip Thomson	Delta Protection Commission	The draft 2017 CVFPP Update includes ways to overcome the permitting challenges for multi-benefit flood management actions. Regulatory reform would take time, but could eventually benefit Delta reclamation districts when they maintain and improve non-project levees, as well as other agencies that build complex projects in areas with highly sensitive species and habitat (i.e., Caltrans, cities, and counties). Having improved permitting processes would be in support of LURMP Policies Utilities & Infrastructure P-5 and P-7.	Comment noted.	No
S-DSC1-01	Cassandra Enos-Nobriga	Delta Stewardship Council	Thank you for the opportunity to review and comment on the <i>Central Valley Flood Protection Plan 2017 Update</i> (2017 Update) and the Draft Supplemental Program Environmental Impact Report (SPEIR). We support the Department of Water Resources (DWR), and the Central Valley Flood Protection Board (CVFPB), in their effort to develop a comprehensive flood risk management and financing strategy. Overall, the Council is encouraged that much of what is included in the 2017 Update is in alignment with the Delta Plan. Our detailed comments on the 2017 Update and the SPEIR are attached.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
S-DSC1-03	Cassandra Enos-Nobriga	Delta Stewardship Council	Flood Management Finance. Council staff is encouraged by the 2017 Update’s proposal to reutilize the Sacramento San Joaquin Drainage District’s fee assessment authority. The Council is interested in the develop of alternative funding mechanisms that could complement the drainage district and contribute to a portfolio of sustainable finance mechanisms based on the “beneficiary pays” principle. Council staff encourages coordination between the Department of Water Resources (DWR), Central Valley Flood Protection Board (CVFPB), the Delta Protection Commission (DPC), and the Council to further investigate proposal to reutilize the Sacramento San Joaquin Drainage District’s fee assessment authority along with those mechanisms identified in the proposed Delta Levees Investment Strategy of the Delta Plan and DPC’s Delta Flood Risk Management Assessment District Feasibility Study (DFRMADFS). We would like to emphasize the importance of coordination and timing of the 2017 Update with both the DFRMADFS and the 2018 Delta Plan review. The DFRMADFS and CVFPP efforts within the Delta appear to be addressing similar issues, regional areas, identified beneficiaries and, in some cases, the same funding mechanisms. This is an opportunity to coordinate the development of significant policy changes that could enhance the way flood projects are funded and managed into the future. Council Staff look forward to collaborating with the Board and DWR to assist in developing funding strategies that work for the Delta as well as the rest of the Central Valley.	Thank you for your comments. DWR agrees that, as implementation of the CVFPP moves forward, we must coordinate closely with other State, federal and local agencies to identify and develop policy changes and funding strategies that benefit the Delta, the Central Valley, and the entire State. The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley. Future plans for delta specific financing and fee assessment authority will be coordinated with all concerned agencies and parties.	No
S-DSC1-04	Cassandra Enos-Nobriga	Delta Stewardship Council	Implementation Scenarios that Consider Alternative Funding Levels. The 2017 Update does a very good job of identifying additional funding needs for risk reduction along with providing a good description of potential future funding. Its implementation, however, depends on anticipated funding levels and mechanisms that have yet to be committed and could potentially be optimistic. To that end, a description of several funding scenarios (1. some funding, 2. a lot more funding, 3. all the funding needed) might help policymakers better understand what levels of funding might lead to what levels of risk reduction. In addition, to strengthen the budget justification, the Plan should consider how flood risk would be impacted should the amount of levee maintenance resources recommended fail to materialize in the future.	Please see Section 7 of the Draft CVFPP Investment Strategy for a thorough discussion of funding scenarios.	No
S-DSC1-05	Cassandra Enos-Nobriga	Delta Stewardship Council	Connections to Nonproject Levees. We recognize the intention of the 2017 Update is to focus on facilities within the State Plan of Flood Control (SPFC). However, the interconnections of the Delta’s non-project levees with the SPFC levees occur at numerous locations, including urban communities like Stockton, rural legacy towns, and the main stems and distributaries of the San Joaquin and Sacramento Rivers. Improving some of these project and nonproject levees to protect key islands and tracts is a priority of the Delta Levees Investment Strategy (DLIS). As long-term plans for reducing risk move forward, it would be beneficial to include a discussion of the consequences if these interconnecting levee networks are not jointly improved. For example, improving levees around an island or tract to inconsistent standards or geometry may create a weak link that poses a risk to the levee network as a whole. Local desires to upgrade rural Delta levees to the Bulletin 192-82 standard endorsed in Water Code section 12225 to guide improvements to the Delta levee network need to be integrated with design criteria for the SPFC. Now that the project levees downriver from Sacramento and Stockton have fulfilled their historic function of flushing gold mining debris through the Delta, it may be beneficial to reassess their future function, considering the mix of project and nonproject levees that protect the affected islands and tracts from flooding.	The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley and, as a planning document, is not meant to be project specific or discuss specific plans or improvements to specific levees or levee systems.	No
S-DSC1-06	Cassandra Enos-Nobriga	Delta Stewardship Council	Conservation Strategy. The Conservation Strategy can be a useful guide for flood management actions that also further the goal of restoring the Delta ecosystem. The river channels and bypass floodplains of the Systemwide Planning Area are key features of this ecosystem, both within the Delta and in the migratory corridors used by Delta wildlife and fish upriver of the Delta proper. The Delta Plan acknowledges the importance of actions to restore these migratory corridors. The Council encourages the CVFPB to adopt the Conservation Strategy as part of the 2017 Update. Adoption of the Conservation Strategy would highlight the strong link between achieving the CVFPP’s secondary goal of restoring the Delta ecosystem, and would encourage future implementation of multi-benefit risk reduction projects within the Delta that also help further the Delta Plan’s strategies. Adoption of the Conservation Strategy could also help	DWR agrees that the Conservation Strategy is a useful guide for flood management actions. The CVFPP update and its supporting documents, including the Conservation Strategy are strategic and long-range planning documents for improving flood risk management in the Central Valley and are not meant to be project specific or discuss specific plans or improvements to specific levees or levee systems. The supporting documents that the CVFPB selects to adopt as part of the 2017 CVFPP Update is at the discretion of the CVFPB.	No

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			<p>demonstrate how the 2017 Update contributes to Action 3 of the Governor’s Water Action Plan - “achieve the coequal goals for the Delta.”</p> <p>The 2017 Update states that the Conservation Strategy’s measureable ecological objectives were applied during the development of the Basin-wide Feasibility Studies. The Council encourages DWR to pursue these measurable ecological objectives as multi-benefit projects are implemented in the future. In strengthening this commitment, especially on projects that are within the Delta, the 2017 Update would be more complementary with the coequal goals.</p>		
S-DSC1-07	Cassandra Enos-Nobriga	Delta Stewardship Council	Adaptive Management. The 2017 Update identifies the use and importance of performance tracking to achieve intended outcomes. This use of performance tracking tracks with the Delta Plan and its inclusion of performance measures to translate programmatic goals and objectives into measurable indicators of progress. The Council recognizes that the development of appropriate metrics is challenging and encourages DWR to utilize performance tracking as a vital part of its adaptive management approach. CVFPP performance tracking should contribute to the administrative, output and outcome performance measures included in the Delta Plan as amended.	The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley and, as a planning document, is not meant to be project specific or discuss specific plans or do specific performance tracking of individual projects at a project level.	No
S-DSC1-08	Cassandra Enos-Nobriga	Delta Stewardship Council	Performance Tracking and Adaptive Management. Related to the general comment above, the Council offers the following clarification to language include in the callout box on page 2-13. The last sentence in the callout box states “The process for developing these objectives and monitoring and tracking performance is challenging and relies on an adaptive management approach to improve the process over time.” The Council offers that adaptive management should be used to learn from the outcomes of projects as they are implemented, so that plans can be adjusted and future projects improved.	Text in the last sentence on the callout box per the DSC’s suggestion will be revised to: “The process for developing these objectives and monitoring and tracking performance is challenging and will rely on an adaptive management approach to learn from the outcomes of projects as they are implemented, so that plans can be adjusted and future projects improved.”	Yes
S-DSC1-09	Cassandra Enos-Nobriga	Delta Stewardship Council	Protecting Habitat Restoration Opportunities. Both the Yolo Bypass and the proposed Paradise Cut Bypass are within areas identified in the Delta Plan as high priorities for ecosystems and therefore subject to the Delta Plan’s regulatory policies <i>Restore Habitats at Appropriate Elevations</i> , (Delta Plan Policy ER P2) (Cal Code of Regs. 23 section 5006) and <i>Protect Opportunities to Restore Habitat</i> , (Delta Plan Policy ER P3) (Cal Code of Regs. 23 section 5007). Planning for these bypasses should be coordinated closely with the Council and Department of Fish and Wildlife.	The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley. Future plans for specific projects will be coordinated with all concerned agencies and parties.	No
S-DSC1-10	Cassandra Enos-Nobriga	Delta Stewardship Council	<p>The Yolo Bypass Multi-benefit Improvements. Council staff is pleased to see the inclusion of the Yolo Bypass floodway improvements proposed in Chapter 3, Strategies to Improve System Management. The proposed action is in alignment with the Delta Plan which identified the Yolo Bypass as a high priority area for ecosystem restoration, noting that restoration of the Yolo Bypass can create conditions that promote enhanced growth and survival of juvenile spring- and winter-run salmon, among other species, in addition to reducing flood risk in downstream communities.</p> <p>Council staff identified two additional projects that are within the boundary of the Legal Delta and described as part of Yolo Bypass Multi-benefit Improvements. Specifically:</p> <p>a. Tying into Sacramento Deep Water Ship Channel and add channel closure gates, and</p> <p>b. Degrading levees to Little Egbert Tract</p> <p>Both projects are located in areas that the Council, through its DLIS, have identified as high priority for State levee investment. Council staff understands that these efforts are in the preliminary stage and the refinements are expected to occur as various phases proceed through project-level planning, and full feasibility level analysis.</p> <p>The Council encourages DWR to incorporate the measurable ecological objectives identified in the Conservation Strategy in the design and implementation of future projects in the Yolo Bypass to achieve multi-benefits for the entire system. As more detailed planning for the project continues. consideration should be given to impacts on downstream flood stages at Rio Vista as well as the Sacramento River and its distributaries.</p>	The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley. DWR agrees with Council staff that these efforts are in the preliminary stage and must proceed, in the future, through project-level planning and a full feasibility level analyses. As DWR proceeds with specific projects it will incorporate ecological objectives as outlined in the Conservation Strategy where feasible. Future planning will take into consideration all relevant factors to flood control.	No
S-DSC1-11	Cassandra Enos-Nobriga	Delta Stewardship Council	Paradise Cut Multi-benefit Improvements. The 2013 Delta Plan identifies Paradise Cut and adjoining lands on the lower San Joaquin River as high priorities for ecosystem restoration. The plan’s recommendation <i>Fund and Implement San Joaquin River Flood Bypass</i> (RR R5) call for DWR and the Board to evaluate and implement a bypass and floodway near Paradise Cut. Planning for the bypass should include setting back levees to provide more complex land-water interface structure and shaded riverine and floodplain habitat that benefit ecosystem function, as well as improving levee system stability and lowering flood stages on the San Joaquin River’s main stem. Council staff applauds the 2017 Update’s plan to begin acquiring appropriate lands for this effort and encourages DWR to also acquire appropriate acreage dedicated to providing habitat functions as well as for flood risk reduction needs. The Plan’s regulatory policy <i>Protect Opportunities to Restore Habitat</i> (ER P3) requires that significant impacts to the opportunities to restore habitat be avoided or mitigated, so it will be important to coordinate closely with the Department of Fish and Wildlife regarding restoration options as the project is further designed and evaluated.	Thank you for your comment. The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley. DWR will continue to coordinate with the Council the implementation of the CVFPP. The goals of the CVFPP support the Delta Plan’s goals of improving water supply reliability and restoring the Delta ecosystem. The Delta Plan is a management plan that will include policies and recommendations, but no specific projects. As part of the development and implementation of the CVFPP and future updates, the Board and DWR will continue to work collaboratively with local, State, and federal agencies, environmental interests, and other parties. Future plans for specific projects will be coordinated with all concerned agencies and parties.	No
S-DSC1-12	Cassandra Enos-Nobriga	Delta Stewardship Council	Urban Portfolio. Council staff identified two projects that occur in the Delta. These are: <p>a. Improving SPFC urban levees for the City of West Sacramento; and</p> <p>b. Proposed levee improvements with USACE and local partners for Lathrop/Manteca</p>	The CVFPP update is a strategic and long-range plan for improving flood risk management in the Central Valley. Future plans for specific projects will be coordinated with all concerned agencies and parties. The Council is focusing on specific projects that will have, or do have, their own CEQA project specific documents. Further, DWR full intends to be guided by and follow the requirements of Water Code Section 9616 to the extent feasible to meet multiple	No

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			<p>Protecting urban areas is one of the highest priorities for the Council. This is reflected in the policies adopted by the Council in the Delta Plan and in the DLIS. The Council is encouraged by the State’s continued efforts to provide urban communities 200-year level of flood protection by partnering with USACE, or in advance of federal participation, with the Urban Flood Risk Reduction Program.</p> <p>However, in our review of supporting document including the <i>Draft Lower San Joaquin River Feasibility Study EIS-EIR</i>, February 2015, and DWR’s Urban Flood Risk Reduction (UFRR) website, it is unclear how the plan intends to promote reduction of risks to live and property in RD 17 without inducing growth and risk.</p> <p>The proposed State Recommended Plan in the <i>San Joaquin BWFS</i>, RD 17 Levee Improvements (Option C), has the potential to achieve these goals, and is more in alignment with the Delta Plan than the proposed fix-in-place alternative described on the UFRR website. The Delta Plan and local government general plans with land use planning authority within RD 17 designate a significant portion of the area for continued agricultural and open space uses, not urban development. Council Staff concurs with the assessment that the RM 52 multi-benefit setback levee would provide additional fish and wildlife habitat, while effectively achieving 200-year level of protection for the existing population within RD 17 that would contribute to the commitments to mitigate agricultural impacts of WaterFix. In addition, DWR should consider the opportunity for coordination with California WaterFix to preserve floodplains and agriculture through the purchase of conservations easements within RD 17. The Council strongly recommends that DWR and the CVFPB adopt the State Recommended Plan outlined in the SJ BWFS.</p>	<p>objectives. Further, the CVFPP explains the critical role that the bypass system has served in reducing flood risks in the Central Valley, and discusses the multiple benefits that could be achieved by expansion of those floodways.</p> <p>As a higher-level policy document, the 2017 CVFPP Update does not include a specific RD 17 levee alignment. In addition to the recommendations in the San Joaquin River Basin-wide Feasibility Study, local agencies will be conducting a locally-led feasibility study to study RD 17 alternatives. As stated in the 2017 CVFPP Update, urban improvements to levees or floodwalls should be consistent with the wise use of floodplains. This would preserve urban development opportunities within specific boundaries without inducing broader urban development in SPFC floodplains that increases aggregate economic and life safety risk.</p>	
S-DSC1-13	Cassandra Enos-Nobriga	Delta Stewardship Council	Table 2-3 includes the Delta Levees Special Flood Control Projects program, but leaves out the Delta Levees Maintenance Subventions Program. This is an important program identified that reduces risk throughout the Delta and should be included.	DWR considers the Delta Levees Maintenance Subventions Program to be a “maintenance” program and not a Flood Management Program affected by flood management policy issues.	No
S-DSC1-14	Cassandra Enos-Nobriga	Delta Stewardship Council	<p>The call-out box on 4-11, <i>Collaboration with Delta Levee Investment Strategy</i> first paragraph does not accurately describe the Council’s Delta Levee Investment Strategy. Consider revising with:</p> <p>a. The Delta Reform Act required that the Delta Plan attempt to reduce risks to people, property, and State interests in the Delta by promoting effective emergency preparedness, appropriate land uses, and strategic levee investments (Wat. Code section 85305(a)) and that the Delta Plan recommend priorities for State investment in levee operation, maintenance, and improvements in the Delta, including both levees that are part of the State Plan of Flood Control and nonproject levees (Wat. Code section 85306). In addition, the Delta Plan’s recommendation <i>Actions for the Prioritization of State Interests in the Delta</i> (RR R7) called for promptly updating the Delta Plan’s priorities for State investment in Delta levees, which the Delta Plan considered as interim. The Council and its staff have been developing the DLIS and its corresponding amendment to the Delta Plan to fulfill these requirements. The amendment recommends priorities for State investment in Delta levees and other measures to reduce risks to lives, property, water supply reliability, and the Delta ecosystem while considering the Delta’s unique agricultural, recreational, natural resource, and cultural values.</p>	DWR feels that the box accurately describes the current status of the DLIS.	No
S-DSC1-15	Cassandra Enos-Nobriga	Delta Stewardship Council	Levee Vegetation Management Strategy (LVMS). The Council is encouraged to see refinements to the LVMS, including the concepts of early establishment of riparian forest corridors and managed recruitment. In the interest of improved clarity, the Council recommends including the LVMS in the CVFPP, or moving the (No Suggestions) Conservation Strategy and Appendices (Appendix D in this case) forward with the CVFPP for adoption. Currently there is a circular reference with the CVFPP stating, “DWR prepared an updated LVMS that is included as Appendix D to the CVFPP Conservation Strategy,” while Appendix D of the Conservation Strategy states, “The 2017 update of the CVFPP is expected to include a more comprehensive levee vegetation management strategy.” This ambiguity should be resolved.	The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board. The contradictory sentence noted in Appendix D of the Conservation Strategy by the commenter has been deleted.	No
S-DSC1-16	Cassandra Enos-Nobriga	Delta Stewardship Council	<p>Delta Plan Policies</p> <p>Council staff understands that the Central Valley Flood Protection Plan’s defined Systemwide Planning Area (SPA) includes the entire legal Delta (Wat. Code sections 9611, 9614(d, e)), while the State Plan of Flood Control Planning Area (SPFC), defined as the lands currently receiving protection from the SPFC (Wat. Code section 9651(g)), includes the islands and tracts in the Delta that are protected by Project levees.</p> <p>In evaluating whether the project may create inconsistencies with the Delta Plan, potentially relevant policies include, but may not be limited to:</p> <p>Coequal Goals</p> <p>Delta Plan Policy G P1 (23 CCR section 5002) describes findings to establish consistency with the Delta Plan, including findings related to mitigation measures, best available science, and adaptive management. In some cases, it may not be feasible for a covered action to be fully consistent with all relevant regulatory policies, but it may still be consistent with the Delta Plan if on whole it is compatible and supports the coequal goals. In any case, it is important to clearly describe how the project contributes to the achievement of the coequal goals, as defined in Water Code section 85054 and the Council’s Delta Plan implementing regulations (23 CCR section 5001(h)).</p>	Thank you for the comment.	No

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			<p>Best Available Science and Adaptive Management</p> <p>Delta Plan Policy G P1 (23 CCR section 5002) calls for covered actions to document use of best available science. If DWR files a Delta Plan certification of consistency, we suggest DWR explain the role of the Delta Regional Ecosystem Restoration Implementation Plan technical review and the “Science Panel” convened in March 2014 in guiding planning and design of the project using best available science.</p> <p>Additionally, Policy G P1 calls for ecosystem restoration projects to include adequate provisions for continued implementation of adaptive management, appropriate to the scope of the action. This requirement can be satisfied through the development of an adaptive management plan that is consistent with the framework described in Appendix 1B of the Delta Plan (http://deltacouncil.ca.gov/docs/appendix-1b), along with documentation of adequate resources to implement the proposed adaptive management process.</p> <p>Mitigation Measures</p> <p>Delta Plan Policy G P1 (Cal Code of Regs. 23 CCR section 5002) also requires that actions not exempt from the CEQA and subject to Delta Plan regulations must include applicable feasible mitigation measures consistent with those identified in the Delta Plan Program Environmental Impact Report (PEIR) or substitute mitigation measures that are equally or more effective. The Delta Plan Mitigation and Monitoring Reporting Program is to be used to ensure compliance with the Delta Plan mitigation measures and this document is available at http://deltacouncil.ca.gov/sites/default/files/Agenda%20Item%206a_attach%202.pdf). See comments described below in the Mitigation section of the SPEIR specific comments.</p>		
TESTIMONY COMMENTS					
T_AR1-01	John Cain	American Rivers	I wanted to just emphasize that American Rivers – at American Rivers, we believe that public safety is the number one priority when it comes to river management, because there are just simply no other options. In the context of the Central Valley, certainly we believe that widened floodways and preventing unsafe development of floodplains is the best way to keep people and property safe from floods. And we also have pointed out that widening floodways and protecting floodplains provides multiple benefits for groundwater recharge, for flexibility and operating upstream reservoirs, for recreation, and for fish and wildlife habitat.	Thank you for your feedback.	No
T_AR1-02	John Cain	American Rivers	American Rivers really wants to thank the Department of Water Resources, particularly Eric Tsai who led the San Joaquin Basin Feasibility study, which is probably of most interest today. His work was tireless and incredibly productive. And he faced a lot of difficult comments from stakeholders, including environmental organizations, and he stuck at the table and worked through it. I also want to thank the Board, and all the other stakeholders – diverse range of stakeholders that attended multiple meetings in the development of this plan for all of their work on this.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
T_AR1-03	John Cain	American Rivers	<p>The 2017 update is an objective driven plan that focuses on flood risk reduction while advancing secondary objectives. And I just wanted to take a moment here to reflect on how that is different than a previous – in the previous approach.</p> <p>Number one, this outcome-driven approach is different – different than a project-driven approach, rather than – and perhaps counsel from RD 17 will take note of this. Rather than say here are all the projects the plan is going to build, it says here are the outcomes the plan is trying to achieve, and then sets forth some approach for how local and State and federal agencies can work together to bring forward projects that will advance those outcomes. And projects that best advance those outcomes are the ones that will get funded. So we don’t have to argue about which projects are in the plan. Instead, we should focus on what outcomes we’re trying to achieve. And the plan has done a very good job on that, although I have some more comments on that.</p>	Thank you for your feedback. DWR acknowledges there is still work to be done on concerns and issues with land use and floodplain management. We look forward to continuing the conversation with both local and regional stakeholders as well as other federal, State, and local agencies.	No
T_AR1-04	John Cain	American Rivers	Secondly, the plan is a flood risk management plan, rather than a flood control plan. And this really emphasizes the need to manage floodplains and avoid the consequences of developing floodplains in dangerous areas. It doesn’t mean there should be no development on floodplains, because we have major cities like Stockton and Sacramento that are already built in floodplains. We can’t stop development in those cities. Rather, we should invest in urban infill in those cities, and really concentrate our development of flood protection defenses against those smaller concentrated developments. We should, however, avoid sprawl development into undeveloped lands that are not protected by adequate levees, because we can’t afford to maintain the levees and dams we currently have. The more we spread development, the more costly it will be to maintain those facilities. So this focus on flood risk management is exactly where it should be.	Thank you for your feedback. DWR acknowledges there is still work to be done on concerns and issues with land use and floodplain management. We look forward to continuing the conversation with both local and regional stakeholders as well as other federal, State, and local agencies.	-
T_AR1-06	John Cain	American Rivers	And the fourth thing that is different about this plan than the traditional approach is the emphasis on multiple benefit projects. One of the foremost flood planners in the country, General Jerry Galloway once said that we protect – we work to protect our – we work to develop our flood management systems to protect against the 100-year event, and then we have to live with those systems the remaining 99 years. The point being, if we’re going to go to all this problem – to all this trouble of protecting against floods, let’s do it in a way that doesn’t destroy the rivers, and doesn’t destroy the quality of life for people that live along the river. And there is a way to develop projects that serve not only the primary risk, the primary purpose of flood risk reduction, but the secondary	Thank you for your feedback. DWR acknowledges there is still work to be done on concerns and issues with land use and floodplain management. We look forward to continuing the conversation with both local and regional stakeholders as well as other federal, State, and local agencies.	-

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			objectives of recreation, water recharge, and habitat restoration. I’m going to – since I’m here with my favorite book, I’m going to read one more excerpt that I forgot to read earlier about this flood risk. In his report to the – that William Hammond Hall in his report to the legislature in 1878, he was the first State engineer, he wrote, “Let it also be remembered that to the case where we deal with the ordinary floods of the valley, no limit may be assigned to the amount of water which may, at some time in the future, come down this valley. And, as in the past, there have been phenomenal inundations now spoken of as the flood of ‘62, or the flood of ‘52, et cetera. So there yet...” – “So may there yet be others as great or greater than they against the general spread of which no human foresight can provide nor secure protection for the great body of the lands in the valley”. And then the author paraphrases more, so we don’t have to hear more of this 19th century language. “Limited locations, Hall remarked, such as cities and towns could be raised in elevation or so well protected by high levees that they could probably be permanently protected. And yet, he observed, wryly in one of his alarming asides, ‘Experienced showed that there were two classes of levees, those that had been overtopped by flood waters, and those that were going to be’“. He continued quote, “And so it should be fully understood that floods willow occasionally come, which must be allowed to spread, but they must be allowed to do so, not in their ordinary way, by opening out crevasses in levees, but by putting strong weirs at several locations so that the outflows could occur without causing damage”. And that’s exactly what the Flood Plan is doing, expanding floodways and recognizing that large floods are going to happen, and we can’t pretend that simply building bigger levees is going to protect people from flooding. We need to have a larger flood risk management portfolio.		
T_AR1-07	John Cain	American Rivers	There are a couple of shortcomings in the Plan that I wanted to just highlight. While it’s great that it’s an outcome driven plan, the metrics could be better developed, particularly for the economic vitality section in its nexus with flood risk. This is a – this is really important. We’ve been working on this for a long time, and it’s disappointing that the Department wasn’t able to get this right earlier.	Thank you for your comment. As noted in Section 2.1.2, it is important that the CVFPP updates describe the progress towards achieving the CVFPP primary and supporting goals. As such it is important to develop tracking metrics for these goals at a programmatic level. As DWR works towards the 2022 CVFPP Update, we will refine these metrics and identify the necessary frameworks to monitor and track them. We will continue to coordinate and collaborate with both regional and local stakeholders during this process.	No
T_AR1-08	John Cain	American Rivers	Second shortcoming is even though there’s a description of a process for tracking outcomes over time, and there’s some recommendations about how it could be done, it’s unclear who will ensure that DWR actually makes progress towards these outcomes over time. And I’d like the Flood Board to consider what their role might be in holding the Department accountable, and how it might be possible to institutionalize that.	Please see response to Comment T_AR1-07. In addition, Chapter 4 makes recommendations to identify and define these metrics as it relates to project funding.	No
T_AR1-09	John Cain	American Rivers	Lastly, the Conservation Strategy, although there are tremendous improvements, it really hasn’t solved the basic permitting problem, how do we make it easier to permit these projects? And so DWR has come a long way, but we need to finish the job. And fortunately there’s new legislation that passed in the fall called AB 2087, and we think there’s a great opportunity to use AB 2087 to figure out how to solve this regional permitting problem. And our organization is working with the Department of Water Resources, and the Resource Agency, and Yolo County on a pilot project in Yolo County in the Yolo Bypass for applying 2087. But I’m disappointed that the Department hasn’t seized this opportunity with more enthusiasm, and actually use the Conservation Strategy as a foundational document for facilitating permitting throughout the valley, not just in the Yolo Bypass.	The 2017 CVFPP Update includes a recommendation to explore regional-scale and long-term permitting mechanisms for implementation and maintenance of multi-benefit projects. This will be a key activity after the 2017 CVFPP Update and moving towards the 2022 CVFPP Update. The Conservation Strategy will provide a strong basis for this work.	No
T_AR1-10	John Cain	American Rivers	And lastly, since we are in the Stockton metropolitan area, I wanted to talk a little bit about American Rivers support for projects in this region. We fully support the Stockton levee improvements. We fully support the idea of working with upstream landowners, particularly in the San Luis basin to attenuate flood flows. And, in fact, I’ve been in conversations with some of those landowners and levee districts. And American Rivers is leading a project to setback a levee in the Grasslands Ecological Area. And we’re submitting another proposal to do something similar with the National Wildlife Refuge. And we fully support the Mormon Slough project. We think it’s an excellent example of the multi-benefit flood management project that would increases the quality of life in the Stockton area. We support Delta levee improvements. We realize that the Delta levees are important to the State water system, and they’re also important to Stockton. If there were large levee failures in the Delta, we would expect to see much more wind-wave fetch against Stockton’s levees, and that would be a problem. We support RD 17 levee improvements options B, D or E. And we’re very concerned that option A of simply building a levee in place, and not getting any kind of protections – insurances that the land will not be developed is counter to the overall flood risk reduction paradigm that the new plan ushers in.	Thank you for your comment. More information on the recommended improvements for this area can be found in the San Joaquin River BWFS.	No
T_AR1-11	John Cain	American Rivers	And lastly, we support Paradise Cut, and have been working very hard with local partners like South Delta Water District, River Islands Development Company, and the San Joaquin County RCD to actually acquire land. We’ve, to date, obtained \$4 million in acquisition grants. We’ve negotiated letters of intent with landowners to purchase flood easements on over 65 percent of the land in the Paradise Cut acquisition area, and we are counting on local and State support for moving this project forward.	Thank you for your feedback.	No
T_AR1-12	John Cain	American Rivers	I want to end on the real difficult challenge that we all face, which is funding. There’s not enough funding to develop all of these projects. Right now, the – there’s a big opportunity to think about funding, because we have a flooding crisis happening right now, and it will continue to happen on the San Joaquin for the next couple of months. There will be large flood releases from the reservoirs. If we work together, we can work to make the	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No

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			<p>funding pie larger, and fund all of the priorities. But if we fight about how to allocate the limited amount of funding currently available, we miss the opportunity to work together to make the funding pie bigger.</p> <p>So that is my plea to let’s all figure out how to communicate, how to work together, how to come up with something that works, and go unified arm in arm to the legislature to figure out how we’re going to get the funding for this. Thank you.</p>		
T_CFB-01	Justin Fredrickson	Friends of the River	<p>I just have some general points that I’m going to try and walk through as quickly as I can, and try and keep it coherent. The – I think the thing that is the newest in the 2017 plan is the fees and the idea of a State alternative for flood insurance. And those things are – there’s very little detail in the plan at this point. I just learned yesterday that there’s, I guess, an investment plan coming out. So we’ll be interested to see the details of that, but I – and I heard you mention, Chair Edgar, that the anticipation that there will be work groups to talk through all those issues, and I think that’s going to be really – really key. Because fees – anything involving fees, taxes, assessments is always kind of controversial, as you well know.</p> <p>And another thing that I’ve heard just preliminarily and, you know, commenting with folks about this is they say, well, we already have – we already just approved this assessment, or we just had our 218 election or whatever, and so people feel like they’re already paying. So if you come to them and say, now we want you to pay more and to the State, then that immediately raises hackles and so – whether there’s an offset, or crediting, or we need to figure out how all of the existing fees and assessments fit – you know, nest within any new mechanism.</p> <p>And another thing that comes up frequently is the concept of return to source. When you’re paying fees or assessments to the State, will you ever see that money again? And the thing that I know has been very controversial for our members is the fire fee, where people are paying fees to the State and they don’t feel they’re seeing any of that money come back. And so there needs to be some kind of a mechanism to ensure that the money is returning to the – to the folks who are paying for it and it’s actually benefiting their area. Their regional priorities are factored into the expenditures of those monies.</p>	<p>The CVFPP Investment Strategy provides more detail on funding mechanisms to support chapter four of the 2017 CVFPP update. DWR and the CVFPB will work together with stakeholders, including the agricultural communities, to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. Funding is one of the 8 top policy issues to be addressed through a transparent and collaborative effort</p>	No
T_CFB-02	Justin Fredrickson	California Farm Bureau	<p>Just talking about the plan in general and the different approaches, I was – just the other day, I was out talking to the board of directors and briefing them on the plan, and I think the reaction – the gut-level reaction from a lot of Farmers still is that they don’t understand the approach. They do not, and they don’t necessarily accept the approach, because they’re – what they immediately talk about is, well, why aren’t we maintaining what we already have? Why aren’t we doing – why are we doing these bypass things. Why will – why would they be taking our land to do this? And so the way to communicate the intent or the purpose behind this plan that we’re asking people to lineup and pay for has not been communicated to them. And I’m actually requesting some briefings with – we have 3 county farm bureaus that would like very much to meet with someone from the DWR, and hopefully someone from the Board. So I’m trying to set that up.</p>	<p>Thank you for your comment. DWR looks forward to continued coordination and collaboration.</p>	No
T_CFB-05	Justin Fredrickson	California Farm Bureau	<p>On – let’s see, on habitat. So we – as you know, we participated in that conservation advisory group for a year, and I think that was a good process. Just yesterday, I don’t know if anyone caught the presentation to the Water Board yesterday. It was by Jacob and by a whole panel of folks, and they were talking about the Stanislaus River, but they were also talking about some of the other lower tributaries. And those were – that was a group of mostly environmental groups. It didn’t include the water users, as the water users were quick to point out. But what I thought was good about it, is that – and I think that’s a valid thing to point out, because they need to be a part of it obviously. It’s their water that they’re using beneficially. So if we’re going to take – you know, repurpose that water or some of that water for other things, they need to be included. But the thing that I thought was good about it is that it was kind of like a local application of this idea of having measurable objectives that are based in science and we’re not – and this ties into our water issues statewide, that we need – it can’t just be like the Water Board is saying right now with the flow standards, that flow is the only answer, and that there are no other factors. And that if we don’t – if we include other things into that, the water can be made to function better than if we just throw water at it and we don’t do all the – you know, address the broader suite of things. And so I thought they did a very good job of looking at that scientifically.</p> <p>And then within that, that look, I think we need to prioritize and be pragmatic, as we go after low-hanging fruit, of which I think there’s a lot out there. And the Flood Plan is – floodplain habitat, as Jacob Katz pointed out yesterday is a big part of that, particularly when you’re talking about salmon.</p>	<p>Comment noted.</p>	No
T_CFB-06	Justin Fredrickson	California Farm Bureau	<p>On this idea of State flood insurance alternative, that’s interesting. Again, we don’t have a lot of details, and so I hope that’s something that we’ll be – we’ll be talking about and exploring. I know there’s interest, but as you know, there are also the other two things – paralegal things, that one is the Agricultural Floodplain Ordinance Task Force recommendations to FEMA, which is a look at potential administrative fixes. And then there’s also the 2017 reauthorization, which is coming in Congress. And so – so there are lots of moving pieces there. The issue still exists, and that is highlighted by something, an ordinance that just came out in Yolo County. And so it’s kind of the same issues we’ve been dealing with up in the valley. It’s – they’re now becoming more aware of that over in Yolo County. And it’s the same issue of the agricultural structures in the floodplains that we don’t have a good answer to.</p>	<p>DWR and the CVFPB will work together with stakeholders to further explore and evaluate new potential funding mechanisms. It is the intent of DWR and the CVFPB to convene committees and workgroups, as appropriate, to address implementation details for solutions to each of the 8 policy issues contained in the 2017 CVFPP Update. Funding is one of the 8 top policy issues to be addressed through a transparent and collaborative effort.</p> <p>The State is currently working with FEMA within the existing NFIP framework to evaluate and implement changes to improve NFIP. However, as we evaluate data regarding California’s participation in NFIP, we will explore the possibility of a State and/or regional flood insurance program to either augment or replace the NFIP.</p>	No

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T_CFB-07	Justin Fredrickson	California Farm Bureau	<p>And then finally, I’ve been working in parallel to, you know, all of this. I’ve been working, along with the Flood Association and some of the Delta farm bureaus, on the things that are being proposed under the Delta. So the levee investment strategy that’s being discussed right now as – you know, as we spoke over at the Stewardship Council, we’re – we have some concerns.</p> <p>But the other – the real core concern for the Delta levees is the Subventions Program. And I’m getting away way from the plan a little bit, but since I have this opportunity, and that is within your purview under the – you know, the ability to pay regulations all of that, I just want to say that I think it’s very important for the Flood Board to coordinate with the Stewardship Council, and the Protection Commission, and the other agencies in working through all those issues and getting that same buy-in that we need on the Flood Plan as well.</p>	Please see responses to S_DSC1-01 through S_DSC1-16.	No
T_COW1-01	Brent Meyer	City of Woodland	I’d just like to thank you for the significant effort involved in putting together the update to the 2017 plan.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
T_COW1-02	Brent Meyer	City of Woodland	I’m here tonight to talk about the Conaway Levee setback and transitory storage study. Appreciate the fact that that’s already been included in – that study has already been included in the plan. This concept is supported by the City of Woodland, and many other agencies. So overall, we’re satisfied with further study of this concept. We see that it’s mentioned on pages 3-12 and 3-14 of the draft Central Valley Flood Protection Plan. However, we’d appreciate if it would be propose – if the project would be mentioned on pages 3-5, under System-Wide Reservoir Storage, and on page 3-21 under Flood Storage Actions. My understanding is Conaway Ranch has actually already addressed the Board at a previous meeting about these actions. And the City of Woodland is just expressing our support for the inclusion of those statements.	Please see response to Comment L_RD20351-02	No
T_ELLIS1-01	Tom Ellis	Land Owner in Colusa Basin/Board of Trustees for Sacramento River Westside Levee District	I would just like to comment. Fritz spoke to you about the functioning of the Tisdale Weir and Bypass during this past event. And I want to tell you it worked very well, as he said, and – but we’re very grateful for the work that was done to clean that out. However, we’re watching the Colusa Weir and that bypass, because we feel there’s some problems there. So I’m warning you, we’re probably going to come talk to you again.	Thank you for your comments. DWR looks forward to continued collaboration and coordination.	No
T_ELLIS1-02	Tom Ellis	Land Owner in Colusa Basin/Board of Trustees for Sacramento River Westside Levee District	Maybe somebody from DWR can answer this. With respect to this last storm, you’re always talking about a 1 in 100 year, 1 in 200 year event. I was wondering if they could evaluate this last even in those terms and give us some idea.	The event in January 2017 was approximately a 20- to 25-year return period. In terms of flow into the Oroville basin, the February 2017 event was approximately a 70-year event.	No
T_FOR1-01	Ronald Stork	Friends of the River	First, I want to thank DWR for allowing interested parties to have a lot of cordial, but frank, conversations about the creation of this plan. And I’m sure that we all wanted to bang on DWR’s door perhaps more than DWR wanted to open the door. But still, those conversations were important. And I think the plan has benefited from not just the conversations that the environmentalists were having, but with other groups who are – have a big stake in this issue. I also want to recognize publicly that this Board is quite experienced, and it takes its job seriously. And the way it handles itself and its relations with the public is really quite exceptionally good. I’m – it’s the way government ought to work. And I wish – I wish it worked as well in perhaps other areas of the State and federal governments. So please, thank you for your service and your continued service, and your real appreciate for how serious and important your work is.	Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.	No
T_FOR1-02	Ronald Stork	Friends of the River	I also want to just make a few general remarks about that I appreciate – I’ve had the opportunity to review the San Joaquin Basin part of this plan, the Sacramento Basin part of this plan, and the general consolidation documents that consolidate the 2 basins. And, you know, I think that some pretty significant projects are getting closer. I’m sure that we all would like to see them get closer faster, but it does seem that both the Department and this Board are using these plan updates to do the real work of making California and the Central Valley, in particular, or these two basins safer, and making sure that there’s some ecosystem and environmental and recreational amenities associated with it.	Thank you for your feedback.	No
T_FOR1-03	Ronald Stork	Friends of the River	I also want to give kudos for the Department for beginning to focus a bit on some of the rural communities. I was quite pleased to see the attention given to Firebaugh in particular with a ring levee and a levee setback. And I think – I’m sure how – I’m not sure how well that plays in Firebaugh – but if I was in Firebaugh, I would appreciate the attention, because the San Joaquin River from time to time is going to have an exceedance. Inflow will equal outflow from Friant Dam, and a lot of water will be coming by Firebaugh. And President Edgar mentioned some other parts in the Sacramento Valley that this plan gets a little closer to addressing issues in. I’m not so sure Wilton was – is part of it. As you know, the county’s perspective on the Columns River is that it’s – that it’s floodplain area and the levees are, to some degree sugar levees that can dissolve with high flows. So those – this delicate balance	Thank you for your feedback.	No

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			of flood water management and floodplain management is something that the State and this Board has to balance as do the local counties, who have floodplain management responsibilities. So getting that right is important as well.		
T_FOR1-04	Ronald Stork	Friends of the River	And then I have some general observations that – on the plan or things I think for the Board to discuss. I think you already mentioned that President Edgar in your introduction, but clearly the – a lot of the levee districts are having challenges staying within the PL 84-99 program. Some of that may be associated with the Corps trees on levees issues, but I think most of that is – is also – is associated with just the inability to find the funds and the willingness to stay in the program. There are implications for that to the – not just – well, there’s obviously some public safety implications to poor maintenance. There’s also, of course, the – the lack of federal aid, which is a financial obligation of somebody, and the increased liability that the State bears, at least as the court’s perspective prevails for that. And how you all deal with that, and how other parts of the State and federal governments deal with that is going to be – going to be a challenge that I don’t think you should forget as you formulate this plan, and as you go about your business outside of plan adoption. That’s kind of my first point.	Comment noted.	No
T_FOR1-05	Ronald Stork	Friends of the River	And I think my second point is that climate change is likely to make your job more difficult, more challenging, and more important. We’re probably likely to see increased peak flows in the future, particularly in the San Joaquin Basin, which now has a lot of snowfall instead of rain, and as it, in very, very large rain floods, becomes more flashy. The San Joaquin Basin is also the basin that relies most heavily on often inadvertent, or at least unplanned, floodplain management for its success in protecting the Lower San Joaquin communities. And that’s again this delicate balance between flood water management capabilities, as well as making sure that you have significant floodplain management understandings that indeed floodplain management will happen in the San Joaquin Basin, but that’s – that’s really only the beginning of these San Joaquin Basin issues that I want to talk about. Joe raised the question today about the – whether or not we’re getting some good stage marks on the Tuolumne. I think it’s – the Board has – and this plan have not focused on reservoir management issues much, and nor have they focused – nor does this plan or the Board focus very much on the floodwater management systems of the tributaries to the main stem rivers. At this point, you know, you – everybody has limited bandwidth, even a Board as talented as this one. So you’ve focused on main stem issues, and bypass issues, including a better bypass in the Lower San Joaquin Basin, which – which is, I think, the beginning of some more hopefully successful attention to the San Joaquin River Basin. But reservoir management has a big effect on this, as does the fact that your Designated Floodways, if you add them all up, don’t – don’t reach the capacity that’s in the San Joaquin River itself. And that’s a – that’s a challenge that I think is still not really grappled with successfully in this plan. The reservoir management issues in these rivers are certainly highlighted by what’s been happening on the Tuolumne this year, which might happen on the Merced this year, which is these reservoirs are really unable to maintain their required flood reservations, largely because they’re limited by the downstream floodways limitations.	The 2017 CVFPP Update included an updated climate change analysis that used the best-available science to estimate flood hydrology with inland climate change and sea-level rise. The climate change hydrology was used to study potential large-scale improvements in the Sacramento and San Joaquin Basin-wide Feasibility Studies. Regarding additional reservoir management opportunities, the San Joaquin Basin-wide Feasibility Study studied a wide variety of reservoir management improvements and recommended several reservoir management actions for further study, including: increasing the objective release on the Tuolumne River, and forecast-informed operations and/or conjunctive use on the Tuolumne River and Calaveras River. More detailed planning and analysis are expected for the 2022 CVFPP Update.	No
T_FOR1-06	Ronald Stork	Friends of the River	Twenty years ago, the flood emergency action team of Governor Wilson, which I served as – on the Citizens Advisory Committee, recommended having a 15 to 20 thousand cfs floodway on the Tuolumne River. I believe that Tim, in an earlier incarnation, noted that recommendation, and attempted to move the ball forward on actually achieving that as a reality. The notion there is obvious, that these reservoirs, with such limited floodway capacity, actually just can’t release enough water to avoid encroaching into their flood space, and in the case of Don Pedro, nearly overtopped. And then the districts and the Corps decided to depart from the manual. I think that was a wise decision, rather than overtop the emergency spillway, particularly so soon after the Oroville overtop. But they just decided to open up the radial gates and begin to make releases in excess of the objective release. And that is a – and in the range recommended by the original flood emergency action team report. So making that happen is important. It has implications to the San Joaquin River downstream, and particularly if you – if you chase that – that issue down to the Merced River as well, which has a similar situation, though it’s low level outlet capacity isn’t as big as Don Pedro, but it does have radial gates that can be opened when the reservoir is significantly encroached to make a release that’s larger than the objective release downstream. And as I said before, you don’t focus on these tributary issues. You don’t focus on the kind of – these details of how to make these tributaries function better. But I don’t think – I don’t think this Board and the State and the plans are well served in not dealing with these issues. Just going on whatever downstream, Exchequer, as I said, it has a similar issue. It’s encroached, but not close to spilling, but it is encroached, and there’s more inflow coming in than outflow. And it’s making the maximum low level outlet release right now. And if more storms come in, it may have to make a release in excess of the objective release. These river tend to be mostly not leveed, but the fact that the – that you have Designated Floodways of limited size means that folks relying on your floodway designations are saying, well, you know, it’s never going to go over 8,000 cfs on the Merced River, and yet it might. And so somehow or another, the Board has got to grapple with these – these issues of your floodways – your Designated Floodway systems that just don’t reflect the reality of operations that are clearly on display on the Tuolumne River today, and may be on display on the Merced.	See response to comment T_FOR1-05. The San Joaquin River BWFS studied these tributary issues on a reconnaissance-level and found that increased objective release on the Tuolumne River and Merced River would be beneficial for flood risk management. More detailed studies are needed moving forward.	No
T_FOR1-07	Ronald Stork	Friends of the River	Another issue on the Merced that I think highlights something that the Board and the State have – and the Corps have been unable to grapple with successfully is – is on the Merced the irrigation districts have sold the local cities	Comment noted.	No

Letter Code	Commenter	Affiliation	Comment	Response	Change in CVFPP?
			<p>and counties on some ideas. An idea that they sold a few – 5 years ago or so was that it’s a great idea to wall off the emergency spillway, take 10 feet of the emergency spillway, which is a 11.3 feet high, and wall it off, because it’s just not needed anymore, because the hydrologic assessments suggest that everything can be routed through – any big floods can be routed through radial – the radial gate system. I don’t disagree with their modeling assumptions, but I do think that this Board and the Corps and Dam Safety folks need to be far more in communication with irrigation districts that may have serious dam safety implications with that – with only 1.3 feet between the top of the dam and the overflow point of the reservoir, that’s – that doesn’t allow a lot of room for error on a dam that could be overtopped.</p> <p>The current proposal is – has been changed somewhat to wall off 6 to 8 feet of the emergency spillway, route the big floods through the radial gates, maybe have some overtopping of a shorter spillway, and have 57,000 acre feet less flood reservation. Take a 300,000 acre foot flood – rain flood reservation and reduce it. So there – what I’m – and I’ll get to you in a sec, Joe. I guess my issue is – that the merits of those proposals, because they’ve not been formally submitted to the Board, to the Corps, to Dam Safety are not being addressed in local communities. And there are obviously dam safety implications, there are floodwater management implications to these issues that are basically not being heard in Sacramento. And the communication between Merced and Sacramento is therefore fairly interrupted.</p>		
T_FOR1-08	Ronald Stork	Friends of the River	<p>Obviously, this – the Department and this Board needs to take advantage of every – sorry, moving on to the next point – take advantage of every opportunity they can to have good habitat in the flood system itself. That certainly means adopting the Conservation Strategy. I think you’ve heard others from the study group to also advocate for that. Levee vegetation may be my last point. And that is the Corps has not reformulated its policy. We need to be careful about saying you’re going to follow Corps policy when indeed you don’t know what Corps policy will be in the future. Certainly, awkward for them to have not undertaken their responsibilities under WRDA and under a court order in an expeditious fashion. So you have that issue of making sure you’re not making commitments that you don’t know if they’re really appropriate.</p> <p>And your plan and DWR’s preference, both in the Urban Levee Design Criteria, as well as parts of your plan, say we’ll follow the Department’s policy, which right now is the life-cycle policy, which is a gradual reduction in woody vegetation in what areas might be considered to be non-conforming. Now, this may be part of my CEQA comments, and that is somewhere, somehow that’s – there are implications to that policy. It may be a slow removal of vegetation, but it’s still a removal of vegetation that may – that I don’t believe the Department or the plan grapples with about mitigation. So that’s an issue that I think still remains. The State and this Board and the Department, of course, need to continue to engage with the Corps to make sure that the Corps understands California’s perspective, and it’s a considerable investment that it’s made in understanding these issues. So that’s kind of what I was – wanted to talk to you about today. And again, I want to thank this Board for the thoughtful way in which it engages with members of the public, including knowledgeable members of the public. And I hope that these remarks are productive and add to your thoughts on how to approach the future.</p>	Please see response to Comment G_FOR1-02.	No
T_LSJLD1-01	Reggie Hill	Lower San Joaquin Levee District	We had 80-some plans in our plan – and proposals. And how do we keep people – how do we keep the enthusiasm continuing out there? Because you’re talking about some extending out 30 years. We’ve got to give them something in the next few years to where they’re going to be buying into the whole process to make sure that this thing continues to evolve and be what we want it to be. So we’ve got to – we make – some of these projects are long-term projects. They’re going to take a long time. But we also need to have something up front that shows that this thing’s working.	The 2017 CVFPP Update recommends a wide range of near-term and long-term actions and outcomes. Section 4.2.2 discusses the timing of CVFPP investments. In Table 4-5, \$4.4 to 5.4 billion is proposed in capital investment from 2017 to 2027 and \$120-150 million in annual ongoing investment.	No
T_LSJLD1-02	Reggie Hill	Lower San Joaquin Levee District	<p>The big thing right now is finding the funding to implement some of these plans. Because most of these are – like I said, our area is mostly rural. And so therefore we need to make sure that they have the capability to not only get their plans formulated and ready for implementation, but also to have some help and some aid to how to get to that point. And some of them don’t have the resources to fill out all of the permits and applications or the requests for some financing. So we need to figure out how do we – how do we get that into their hands to where we can help them get to that point. And most of them are probably going to be looking to the agencies to help do that...</p> <p>Well, there should be some type of clearinghouse where that is available. And there’s got to be through RFMP – like I said, our consultant has done an excellent job of preparing the plan. And we need to find out how to finance their ability to find those things for these proposed plans at that level, at the small levels.</p>	The State’s intention is continue the regional flood management planning process, demonstrated by several recommendations made in the 2017 Update. Regional collaboration will be key in committees/workgroups developed to assist addressing the 8 policy issues.	No
T_LSJLD1-03	Reggie Hill	Lower San Joaquin Levee District	What we did is we broke – there’s a lot of proposed projects in the plan. But we broke a lot of it down into geographical areas because each area is specifically different for what they’re trying to attain. Even though all of them are multi-benefit programs. But, anyway, and that’s what we’ve been trying to work with is trying to get them so that they can package whatever their proposal is into a point of what I alluded to earlier, is so that when some funding arises or is recognized that will fit what they need, then they can go ahead and start moving on that... And I think that’s the key is – and like I said, we need to find some short terms in addition to the obvious, long terms that are out there.	Please see response to comment T_LSJLD1-01.	No

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T_RD171-02	Dante Nomellini	Reclamation District 17	The problem I have, as a representative of the local district, is moving forward to accomplish the needed flood protection for that area... the Department of Water Resources has taken the position that there has to be an acquisition of development rights in that area, rather than rely on the Delta Stewardship Council plan, which prohibits development in a certain part of that area, and zoning local land-use things that don’t plan to put development in in that area. What that does to the overall economics it just adds a tremendous cost for land acquisition, which makes the project prohibitive. So the proposals that you’ve... outlined, and I’ve been unsuccessful in changing them, don’t include what the local district wants, which is a fix-in-place with some recognition of the land-use limitations that already exist. Absent that, there would be funding perhaps, which is non-existent for acquisition of development rights... we’re not opposed to that, but we don’t have the wherewithal to fund it.	Please see the response to comment L_COST1-09.	No
T_RD171-03	Dante Nomellini	Reclamation District 17	I would always hope that we would have a joint State, local, and federal partnership... to protect the people, and protect the assets that are there... I sense they don’t have a full feel for the problem, at least the way I see it. I see flood risk to populations in a much greater extent with regard to evacuation and protecting our routes for evacuation of the area, and the region, and the Bay Area, not only for flood control, but from other disasters. So I fail to see how we’re going to be able to move forward with some of the plans in here. And I would hope that you don’t buy into the recommendations specifically, but rather keep it open, so that we can do the detailed investigation and come up with a solution.	Please see the response to comment L_COST1-09.	No
T_RD171-04	Dante Nomellini	Reclamation District 17	[W]e support Paradise Cut, but Paradise Cut is going to be a rather minor diversion of water out of the San Joaquin system. The projections with climate change are talking about 300,000 cubic feet per second... [I]t would force one, in my mind, to look farther upstream for solutions to spreading the water, spreading the flood waters, developing the floodplain, and even considering expansion as reservoirs, and things of that type... I think what’s lacking in this plan is a solid recognition of what the practical realities are in the system.	Regarding the claim of 300,000 cfs flows from climate change, please see response to comment L_COL2-24. Regarding the fraction of water diverted from an expanded Paradise Cut bypass, please see response to comment L_COL2-27. Reservoir management actions and floodplain transitory storage were evaluated in the San Joaquin River BWFS and both actions are included in the 2017 CVFPP SSIA Portfolio.	No
T_RD171-05	Dante Nomellini	Reclamation District 17	I’m not sure which document they’re in, but [DWR] had... four or five alternatives for RD 17. Every one of them had a setback levee at the confluence of the Old River and the San Joaquin, which... would be an absolute disaster to change the flow split, so that more of our water goes down the San Joaquin. [N]obody in their right mind... would buy the liability in such an alternative. [DWR] should have at least had a fix-in-place alternative that the local district wanted.	The analysis described is included in the San Joaquin BWFS. However, the 2017 CVFPP Update does not include detailed recommendations of a specific RD 17 alternative. As stated in the San Joaquin BWFS, the setback levee studied at the confluence of the Old River and San Joaquin River would not change the flow split because the existing south levee would be left intact. Regarding fix-in-place alternatives at RD 17, USACE has already determined that this would be noncompliant with Executive Order 11988 on the wise use of floodplains and was therefore excluded from the Lower San Joaquin River Feasibility Study.	No
T_RD171-06	Dante Nomellini	Reclamation District 17	But in [the CVFPP 2017 Update] is detail. And with the detail is the word “recommendation”, specific. That’s where I see the problem... if [the CVFPP 2017 Update] is programmatic, fine, but... [DWR has]... a lot of pages of documentation here that ends up being adopted by [the CVFPB]... So we’re facing practical obstacles to move forward in the shorter term to try and protect, which I see are, principle assets that go well beyond the local district, and of regional concern. And I think the documents that are in this pile of paper create a prejudice towards moving away from what I see is craziness and unachievable physical plans for the area... [W]hat we’ve got in your plan that... I’m objecting to is specifics with regard to recommendations that I think are going to be prejudicial. If we stay in the high level, that’s fine.	Please see the response to comment L_COST1-09.	No
T_RD171-07	Dante Nomellini	Reclamation District 17	I think the court made that... finding... I’m trying to tell you that dealing with that development in the floodplain issue with certainty based on acquisition of the development rights adds significantly to the cost and makes it basically prohibitive. So if we can’t depend on something like that, it’s going to be very difficult.	Please see the response to comment L_COST1-09.	No
T_RD1081-01	Fritz Durst	Reclamation District 108	In RD 108, thanks to the work of the Flood Protection Board and DWR, we were able to clean out the Tisdale Weir, which functioned very well in the past several months. We saw 2 foot lower river levels with high flows, and we really appreciate that. It’s a big difference on the levees. And also, through an emergency preparedness grant, our region, thanks to Lewis Bair, worked really hard on getting together plans, supplies. And when things started to get kind of dicey, I saw calmness in our area. And people were doing the proper things to prepare for an emergency which, thank heavens, never happened.	Thank you for your comment.	No
T_RD1081-02	Fritz Durst	Reclamation District 108	I’m speaking on behalf of the Mid and Upper Sacramento River, Feather River, and the Lower Sacramento and North Delta regions. The flooding that we’ve experienced today after 5 long years of drought is highlighting the fact that we can’t afford to ignore our aging flood management system. We thank the Central Valley Protection Board and the Department of Water Resources for funding the Regional Flood Management Planning processes. The process has allowed for a more bottoms up planning process for the – this 2017 update. Not only has it strengthened relationships and communication within each region, it has matured to a point where our 3 regions representing the Sacramento River Basin can express these concerns in a single voice. I urge you to continue funding the Regional Flood Management Planning Process after the adoption of this plan. Funding is one of the biggest challenges that we have with this plan though, and it’s how its recommendations will ultimately be funded. We have concern that additional fees or assessments on top of existing assessments will erode our capacity to generate funds we need for operations and maintenance, and for the local cost share needed to match State, and in some cases, federal funding for future capital improvements.	Please see response to comment L_RD1081-04.	No

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T_RD1081-03	Fritz Durst	Reclamation District 108	In our district, we have had several 218 elections to raise fees. And the landowners have been very much on board. We have kept them apprised of the need to – to have our SWIF in place. And I think education is very important for other districts to let them know what’s needed, so it can – the work can get done. We recommend that an advisory committee to the Central Valley Flood Protection Board be established and funded as part of an adoption process for local participation in the future, exploring the funding concept introduced in this 2017 update. There’s no definite approach on how the plan – State plans to implement the various management actions outlined – outlined in the plan. As Mr. Edgar pointed out, it’s a plan, but plans without implementation are not very valuable. We need to collectively focus more attention and resources on the processes necessary to fund local agencies as quickly as possible, so that this plan and important public safety projects can be implemented. We recommend the update includes an implementation plan that’s explains how the policies and programs recommended will be prioritized and executed.	Please see response to comment L_RD1081-04.	No
T_RD1081-04	Fritz Durst	Reclamation District 108	The State’s liability, as determined by the courts, has driven the Central Valley Flood Protection Plan and legislation mandating higher levels of flood protection in the Central Valley. A section that clearly emphasizes and summarizes the consequences of inaction is necessary to reinforce the importance of the 2017 update. Such a description is also necessary to demonstrate to the administration and the legislature the consequences of the no-action alternative. A decision to not invest in the flood system improvements may ultimately pale in comparison to the costs to recover from a catastrophic flood. Opportunities for enhancing habitat as part of improving the flood control system focused almost exclusively on opportunities that would be created by setting back existing levees. The projects in the RFMPs should be included in determining the best opportunities to achieve the measurable objectives of the Conservation strategy.	Thank you for your comment.	No
T_RD1081-05	Fritz Durst	Reclamation District 108	We support the evaluation of the State Flood Insurance Program that plays the dual role of mitigating flood risk and funding implementation of the Central Valley Flood Plan. We recommend establishing an advisory committee to the Central Valley Flood Protection Board to further discuss considering substitution of a State and regional administered flood insurance program for the NFIP that includes local participation. And we need to advance the discussion of how this population growth, land use, and decision making and floodplain management are integrated into the development of the statewide policy. We suggest adding a discussion about how this plan recognizes the State’s projected population and economic growth within the valleys, and in the long term how residual risk will be managed.	Please see response to comment G_SRRFA1-09.	No
T_RD10041-01	Terry Bessler	Reclamation District 1004	I didn’t see anything in the plan about the Cherokee Canal Setback in Butte and Glenn County. I just wanted to make sure there’s nothing in there.	Please see 3.1.2, “Feather River -Sutter Bypass Multi-benefit Improvements”. DWR recommends that further study, in close coordination with locals and regional stakeholders. There are no specific recommendations in the 2017 CVFPP Update for this region.	No
T_RD10071-01	Dominick Gulli	Reclamation District 1007	<p>Again, Dominick Gulli with Green Mountain Engineering up here to speak on behalf of my Reclamation District 1007, which is the Pico Naglee district, which nobody really knows about it. It’s on the north side of Tracy. And it’s affected by the Paradise Cut Bypass. It’s on the Old River. The levee is so huge there that – and high – and Dante has told me about the history of why those levees are so high. And it has to do with battles between people buying dredges and wanting to be higher than the other people. So they are high, because there was a lot of dredging that took place down there. And I kind of disagree with the statement that the levees weren’t built good in the old days, because in the old days they used to build levees with this – they’d take however much money they have, and they would get as much dirt as cheap as possible, rather than the way we do it these days is that we specify the dirt, and it has to come out of some far away place, and we get about a tenth of the amount of dirt we would have, if we had just used our local sources. And I’m – I work primarily in the Delta, and I don’t work on any project levees just because I’m – and I want to step back a second. I’m not – I don’t want to offend any of you up there. I’m kind a brash person I’ve learned. I have started to get into project levees a little bit, but I’m not – I don’t mean to offend anybody. I’m just – so anyways. I don’t work on the project levees. Mostly in the Delta, which we take whatever money we have, and we buy as much rock and dirt as we can, and put it on the levees. And I agree with Mr. Nomellini that this plan, when you make things so specific what tends to happen is a project that’s thought out by a whole bunch of consultants, and whatnot, gets focused in on. And then if another plan that’s more economical and more beneficial, it doesn’t get considered, because it’s part of the Central Valley Flood Protection Plan.</p> <p>Now – so the Paradise Cut Bypass is a good idea, but – and all the things that Mr. Countryman was talking about, design flows when things were designed, nobody is taking into account how much silt comes down the San Joaquin River, okay? And I’ll – I haven’t read your plan yet. I will, but I’m betting the word “dredging” is not even mentioned in the plan at all. Now, the San Joaquin River in ‘97 I was working with a company, and we had a suction dredge. And we get called in after the fact to protect one of the levees – or to rebuild one of the levees and we used the suction dredge. And we headed out in the middle of the river, and one day the crew left the cutter head down on the bottom of the river, and it got filled in, and it got stuck, because there’s so much silt coming down that San Joaquin River. Mr. Alex Hildebrand was a big advocate of dredging the river. And if you talk to the locals down there – and not that geotechnical engineers, or all these people, but the locals, they understand the problem is all</p>	See response to comment G_GME1-24.	No

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			<p>the silt coming down. In the olden days, they used to – used to dredge a lot, and that increases the capacity, because most of us are engineers, we understand that Q equals AV. And when the area of the channel is bigger, you can handle more flow. So the 50,000 cfs that Mr. Countryman was talking about, we don’t have that today, because all the silt that comes down in every one of these storms. So I drive up the San Joaquin River to see what’s happening. And if you look at that Arch Road, Airport Road bridge, there’s islands out there that are – have developed because of all the silt. And those need to get cleaned out. Dredging is this big mystique that it’s terrible for the environment, but it’s really not. I mean, if you look back in history, when Ed Dutra was the dredging in the Delta, well, there was a bunch of salmon around then, and there not here anymore, and they’re dredging. So obviously, it can’t be that bad for the fish and the wildlife. But one thing it is good for is the free source of dirt, and you put it on the top of the levee, increases the capacity of channels, provides colder water for the fish and everything. And I would just like to get a plug. As far as 1007, you guys want to push all this water down Paradise Cut, that’s fine, but nobody is talking to the people down there.</p> <p>Now, two of the people down there that you should be talking to had an editorial in the Stockton Record today. One of them is a trustee in 1007. Her name is Betty Galli. She’s Louis Galli’s wife. And the other one is Sharon Votto, and she lived right on the river. And they put a big plug in, and explained to you – to – well, she just – it was an editorial in the Record, but we need to start dredging again, because the channels have silted up. It’s a maintenance issue. And in order to maintain these capacities, you need to get the silt out. And while you’re at it, you can take it out, put on the backside of the levee, and it’s a multi-benefit. Thank you.</p>		
T_RD15001-01	Steven Butler	Reclamation District 1500	<p>My reasons for addressing the Board tonight are maybe a little bit off topic, because I’m concerned about the setbacks that have been proposed for the Sutter Bypass levee, which I notice is not being discussed tonight. But if I could I’d like to get some points into the record about what I think is a pretty important subject. Because I’m a farmer at the base of the levee, obviously, any plan to setback the levee is something that any farmer would probably oppose, and I do. But my reasons are not just because it would be setback onto my family’s farm, my reasons go beyond that. As a trustee over the years at 1500, I’ve been made aware of efforts to setback the Sutter Bypass levee for additional flood control, which I support, and I support the efforts that are – you folks have proposed tonight, and I think that they’re very important. But over the years, the focus has gone from setback the east – setting back the east levee to setting back the west levee. And I think that there are several important reasons why the focus needs to be back on the east levee.</p> <p>The first reason I suppose would be the fact that the natural elevation of the east levee is higher. So obviously, a replacement levee, when it’s constructed for probably – oh, I don’t know. I think there’s about 35 or 40 miles proposed. A smaller levee would be a lot cheaper to construct, because the elevation on the west side is quite a bit lower. In addition to that, the current land use on the east side of the Sutter Bypass is mostly wildlife conservation easements on lands that are either used as duck clubs or other sorts of habitat for refuges or nature preserves, things of that nature. So the assessed value of that property is a good deal less than the farm land on the other side, which is almost completely farm land that at the present time is assessed at about \$10,000 an acre. So the loss in tax revenue to Sutter County would be a lot more significant if the setback were to occur on the west levee, rather than the east levee, and it would go over the top of all of those already existing habitat lands.</p> <p>Finally, the water company that I’m President of, Sutter Mutual, the third largest diverter of the Sacramento River, has a major canal located on the toe of that levee. It’s our largest canal in the entire service area, which is about 50,000 acres. And that canal would obviously have to be rebuilt, all of the turnouts, weirs, water control structures, [etc] would have to be constructed along with that canal, which would further add to the expense. And so I’m hoping that when this item becomes front and center in the next phase of your study, you’ll take the time to restudy this.</p>	<p>A recommended option was not selected from among the Feather River-Sutter Bypass options because it is anticipated that flood management improvements in this region would not be implemented until 2030 or later, after Yolo Bypass multi-benefit improvements are completed. Therefore any potential system-scale improvements of the Sutter Bypass would be further refined through future study to formulate a recommended option in close coordination with local and regional stakeholders.</p>	No
T_RD20351-01	Robert Thomas	Reclamation District 2035	<p>I want to thank the Board and DWR for including the Conaway Ranch Transitory Storage Project in your draft plan. This plan was supported, and you have letters, from the City of Woodland, the City of Davis. You have it from Yolo County. You have it from Caltrans, because, as you now, I-5 is in jeopardy, that if it floods, it’s a major evacuation route for Sacramento. And it’s supported by the Lower Sacramento River Delta North – excuse me, North Regional Flood Management Group. There is a large interest in this relative to the impact on current infrastructure in the City of Davis, the City of Woodland, and the Yolo County landfill. The current west levee does not provide 100-year protection. We are in compliance relative to the maintenance of that levee. Our experience with this recent rain storm, we have about 7 areas of that levee that we’re having sloughing that we’re going to have to deal with. But clearly, this new west levee setback levee concept would allow for greater storage during these conditions relative to flood control.</p> <p>Clearly, it meets some of your objectives for habitat. You have a private property owner that’s interested in working with you, and the cities, and the county, and Caltrans in evaluating this option. This option, at a reconnaissance level cost estimate to do the new west levee, because you’re going uphill towards Davis and Woodland, is about 80 to 100 million dollars. To fix the west levee and only get 100-year protection versus the new west levee is about \$180 million. So it makes a lot of sense to a lot of people in terms of cost, and meeting some of the objectives in the plan</p>	<p>Thank you for your feedback. Please see the responses to Comments L_RD20351_01 through L_RD20351-06.</p>	No

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			<p>for habitat, and widen the bypass. We support, by the way, the principles of your study. We think they’re sound principles. We understand that there are going to have to be local assessments. That’s the only way we’re going to get it done. You’re never going to have a plan that satisfies everyone. But we need to get a plan adopted, so we can get into the details that are necessary to move forward on some of these projects.</p> <p>At the bottom of the information I handed out to you, this study is included on page 3 and 5 – oh, excuse me, page 3-12 and 3-14 in your draft plan. And thank you again for having it in your draft plan. We’d also like to include, and we’ve included some attachments, that be included in some other sections of the report. We think it’s appropriate that it be mentioned on 3-5, which is the system-wide reservoir storage section of your report, because it is applicable to that section, and page 3-21 under floodplain storage action. And we’ll submit this to DWR, so they have the same comment letter. But I want to thank you for including this. We want to be, both from the private landowner’s standpoint and the government agencies in Yolo county, supportive of moving forward with a study. And I’d be happy to answer any questions you might have.</p>		
T_AR1-05	John Cain	American Rivers	<p>Thirdly, with minor exceptions, it’s the first time in more than a century that we will invest in major floodway expansions going forward. And I want to read a couple of excerpts from one of my favorite books here, Battling the Inland Sea to show that this idea of flood risk management, and also the idea of expanding floodways is not a new idea. It was an idea we had in the 19th century that somehow we forgot with the disastrous flood control policies from 1936 and 1944 water Resources Development Act. And we are now with this plan coming back to our senses. In the 1998 reprint of Battling the Inland Sea, David Kennedy, the longest serving director at the Department of Water Resources, wrote the foreword. And he talked about how well the bypass system had performed in the Sacramento Valley. And he reflected on the very difficult political debates that happened in 19th century. He writes, “One of the central issues in the Sacramento Valley, not resolved until the first decade of this century...” - that is the 20th century - “...was whether large flows coming down the Sacramento River should be controlled entirely within the levees bordering natural channel or rather be allowed to spill into a defined bypass system. For a long time, engineers proclaimed that there would always be enough hydraulic capacity within the levees of the river for even the largest flows”. Well, the floods of the early 19th – early 20th century proved that wrong, and the flood bypass system was developed after a lot of political debate. At the time he wrote this document, he said, “It’s perhaps time to consider a new flood bypass on the San Joaquin River”. And he writes, “Further consideration is...” – he wrote this in 1998, almost 20 years ago, “Further consideration is now being given to opening up some form of bypass through the South Delta to relieve pressure on the levees, as the San Joaquin River flows into the Delta. It is hoped...” - that’s – that’s a passive voice, which is common among bureaucrats. “It is hoped that these issues will be resolved and changes will be made before the next flood”. He was talking about Paradise Cut. It is hoped. I hope that it will happen. I hope – I am grateful that the Flood Plan has a good approach for Paradise Cut.</p>	<p>Thank you for your feedback. DWR looks forward to continued collaboration and coordination as we continue flood management planning and implementation.</p>	No
G_AC2-01	Ric Reinhardt	Advisory Committee	<p>Recommendation 1: Jacob, Justin: As the AC’s original recommendations 1, 2 and 3 seem to have been adequately addressed (as per Ric and Justin’s analysis below) it appears that the AC’s original conditioned recommendation that the CS be approved and adopted as part of the 2017 update has been met and would therefore stand.</p>	<p>The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board.</p>	No
G_AC2-02	Ric Reinhardt	Advisory Committee	<p>Recommendation 6: Ric, Justin: This is partially addressed in the CVFPP Update: “The Conservation Strategy began to inform RFMP development and continues to guide DWR’s prioritization of multi-benefit projects, just as the RFMPs can likewise inform utilization of the CS as a tool. The CS may continue to inform future phases of RFMP development as funding and other resources allow and vice versa.”</p> <p>Later states “Any actions not selected for the 2017 update may be further developed or refined for consideration in future CVFPP updates.” Suggest adding text that the CS measurable objectives will be updated as part of the 2022 update to the CVFPP to reflect the projects identified in the RFMPs and through further collaboration with the Regions.</p>	<p>Page 2-11, first paragraph add: “Assuming the availability of funds, DWR in coordination with regional partners will evaluate the extent to which habitat projects included in the RFMPs contribute to ecological objectives of the CVFPP.”</p> <p>Revise Page 2-11: “The assessment process resulted in a selection of actions organized by basin and region, with potential projects characterized by scale and anticipated implementation timeline. Any actions not selected for the 2017 CVFPP Update, including projects recommended by the RFMPs, may be further developed or refined for future consideration in future CVFPP updates.”</p> <p>Revise Page 2-13: After “...are not mandated performance criteria.”, add, “The measurable objectives are iterative in nature and may be reevaluated and revised as necessary, based on improvements to scientific understanding and further evaluation of opportunities for multi-benefit flood management projects, during future updates of the CVFPP.”</p>	Yes
G_AC2-03	Ric Reinhardt	Advisory Committee	<p>Recommendation 7: Ric: This is partially addressed in the 2017 update and is the MOOM. Other projects that are being planned should be added. One example would be Lower Elkhorn.</p> <p>Jacob: The included examples (Yolo suite of actions and Paradise Cut) are generally sufficient although considerably more ink should be given to describing the Lower Elkhorn project as it is highest profile multi-benefit project likely to be built in the 5-year time span of the 2017 Update.</p>	<p>Add a new sidebar on page 3-12: Lower Elkhorn Basin Levee Setback DWR is in the process developing a proposed project for a new 7-mile-long setback levee on the east side of the Yolo Bypass in the Lower Elkhorn Basin. This effort represents an important first step toward implementation of a long-term vision for multi-benefit expansion of the Yolo Bypass. The proposed project is being formulated in close coordination with affected landowners, local, State, and federal agency partners. Ongoing project development efforts are striving towards a cost efficient balance of flood management improvements with agricultural sustainability and ecosystem and recreational improvements by leveraging information and relationships developed through the Sacramento River BWFS and Lower Sacramento River/Delta North RFMP.</p>	Yes

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				Add text to Section 4.5.3: It is the intent of the CVFPP to promote multi-benefit projects within the flood system. Ongoing project examples include the Bear River setback levee and the Three Amigos habitat area. Examples being planned in cooperation with landowners are the Paradise Cut and Yolo Bypass expansions. Yolo Bypass multi-benefit improvements are planned to include widening the Fremont and Sacramento weirs, fish passage over Fremont Weir, and flood-season rearing of juvenile salmon.	
G_AC2-04	Ric Reinhardt	Advisory Committee	Recommendation 8: Rene: Section 2.1.2 (Pages 2-12-2-13) should include a box that summarizes quantitative flood risk performance objectives used a) to model system configurations in BWFS and b) that system performance will be measured against going forward.	Add new sidebar to page 2-12 or 2-13 entitled Flood Risk Objectives: The objective flood protection targets associated with urban areas were specified by the Legislature as 200-year level of protection (0.5% probability of flooding per year or less for urban areas). For small communities, 100-year protection (1% probability of flooding per year or less) is an unofficial target established by Congress’ 1968 National Flood Insurance Act under which communities that voluntarily participate in the National Flood Insurance Program are no longer subjected to mandatory flood insurance While the Legislature or FEMA did not require a specific level of protection for rural-agricultural levees, DWR recommends an approach without numerical targets to repair distressed levees as needed to sustain existing land uses or consider levee setbacks to provide multiple benefits associated with different land uses. CVFPP investments are prioritized based on flood risk and life safety, when funding is available. Therefore, levee improvements included in the CVFPP contain an emphasis on addressing seepage where life safety is a concern in urban areas and small communities, as seepage is a primary cause of failure. This is a major change from historic flood protection plans such as the Jackson Plan, which emphasized channel capacities and levee geometry. Still, without specific numerical targets for rural areas, much effort remains to repair distressed levee sites in rural areas, and to develop and implement more robust emergency response to reduce flood risk. The CVFPP recognizes that the risk of flooding can never be eliminated, and investments in residual risk management remain a critical part of the State’s approach to achieving the primary goal consistent with the Act. Flood risk objectives associated with system-scale actions such as those studied in the BWFSs also contribute to improved flood protection in rural areas. These include improving the flood conveyance capacity and reducing flood stages in the flood management system while improving flood system resiliency and facilitating adaptation to future climate and land use changes. System-scale actions are also formulated to meet ecosystem and related multi-benefit objectives.	Yes
G_AC2-05	Ric Reinhardt	Advisory Committee	Recommendation 9: Rene: Pages 1-3, 1-4 and chapter 4 should incorporate text clearly articulating that: among the costs and challenges of implementing multi-benefit projects is the cost of the regulatory process. Under our current regulatory paradigm, as more species become impacted by flood projects that lack an ecosystem component, flood management will become increasingly difficult and costly to permit. Additionally, implementing the ecosystem component of multi-benefit projects separately is often significantly more costly and inefficient. Providing additional funding to ensure that the ecosystem benefit portion of projects are implemented provides a basis for designating more multi-benefit projects as “self-mitigating” and significantly reducing both the regulatory burden associated with those projects and their total implementation costs; Section 4.1.3 should provide a list (in a table or figure) of potential funding sources for multi-benefit project components and their relative potential contribution versus the anticipated need, Section 4.1.3 and 4.1.4 should specify the anticipated costs for a) capital investment and b) ongoing investment associated with the multi-benefit components of projects over the next 30 years as well as how multiple funding sources will be brought together to achieve the funding needed for Multi-benefit projects. Figure 4-3 should include a range of potential costs necessary for ecosystem objectives specified in the CS and make clear the cost is related to objectives; Table 4-2 should include habitat and ecosystem objectives (e.g. habitat improvements in the Yolo Bypass and Paradise cut) and associated costs in the “System-wide” (top) portion of the table (in addition to the “Rural” and “small communities” sections where they currently appear. Figure 4-4 should include a projection of cost associated with O&M of habitat and ecosystem components of projects over the next 30 years. Table 4-3 should include Habitat and Ecosystem Restoration related O&M costs in the System-wide, Rural, and small communities sections of the table. Section 1 (pages 1-3 and 1-4) and Section 4.2 should clearly articulating DWR’s intention to structure future funding guidelines to incentivize multi-benefit projects.	1. Added text on the 3rd bullet on page 1-3, “Managing for multiple purposes includes the challenge of securing adequate funding to comply with increasingly stringent environmental regulations. 2. Revised text at the end of the paragraph on page 4-5, section 4.1.3, “All of the State funding mechanisms could provide a funding stream for multi-benefit projects, including ecosystem components, depending on what is legally authorized. Each funding mechanism’s applicability depends on the nature of the mechanism’s revenue stream (ongoing vs. limited-duration capital) and nexus of the mechanism’s purpose with the proposed action’s benefits. Other funding mechanisms, such as federal ecosystem programs, could also provide funding for ecosystem components of multi-benefit projects.” 3. Page 4-45: Added the following text: “The Board may consider making a recommendation to the Legislature to provide sources of funding for the multi-benefit elements of the CVFPP.”	Yes
G_AC2-06	Ric Reinhardt	Advisory Committee	Recommendation 10: Ric, Rene: The 2017 Update should include specific text (Section 1 and 4) explaining the value of RFMP projects to have basin level effects both individually and cumulatively on local scale flood management, system scale flood management, and both local and system scale Habitat and Ecosystem Restoration. Funding projections for the near term should specifically call out the need for funding for RFMPs to a) design projects to meet both flood and ecosystem objectives and b) to track overall progress towards flood and ecosystem objectives within the Flood Regions through time. Section 3.1.6 (sub heading: Quantitative Estimates of Expected Contributions to Desired Outcomes) should discuss the need for basin wide designs and RFMP projects to work together to advance and track progress towards conservation objectives at the Regional, Basin, and system-wide scales. Include as an example specific reference to the analysis the LS/DN and the Feather regions did to estimate	Chapter 1 is before where the concept of RFMP is introduced or future recommendations are made. Recommend including this text later in the document, with more general language to encompass other multi-benefits (such as water supply) (Ch 3): 1. Page 3-37, first paragraph, added the following text: “For instance, ongoing collaboration with the regions will continue to identify and refine potential actions across scales (systemwide, regional, and local) to collectively provide desired ecosystem vitality and related multi-benefit outcomes for the CVFPP.” 2. Page 3-37, added a sidebar: Estimating Ecosystem Vitality Contributions from Regional Actions – The three RFMPs in the Sacramento River Basin	Yes

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			how projects identified in their RFMPs contributed towards achieving the CS measurable objectives, and include a figure depicting this (could either be a figure depicting different objectives as bars in a graph and projects making progress towards matching those bars, or a map that shows percent of different objectives achieved in different areas around the region).	have begun to identify local and regional scale opportunities for ecosystem restoration and enhancement in their regions and estimate potential contributions to ecosystem vitality outcomes. Future regional collaboration could continue to develop and refine such opportunities and extend the effort to other regions in support of future CVFPP updates. Added text to Section 4.5.3: “To the extent funds are available for continued planning efforts; it is recommended that the State continue to fund the RFMPs to assist in formulation of potential flood projects, including multi-benefit elements and support for measurable objectives. Additional effort is needed for regional collaboration in order to further develop and refine estimated contributions to ecosystem objectives from regional-scale actions and progress towards measurable objectives, in coordination with the State (See Section 3.1.6).”	
G_AC2-07	Ric Reinhardt	Advisory Committee	Recommendation 11: Rene: Section 3.2.4 Should include language specifically describing the need for additional funds in support of incentive programs to increase private landowner participation in expanded ecosystem service markets. “Multiple Objective O&M” Box (Page 3-43) should include specific mention of a habitat based crediting system that, in addition to supporting the tracking of multiple O&M objectives, could provide funding for long-term O&M through the sale of credits for benefits that exceed mitigation requirements. Table 4-4 Should include a habitat based crediting program as a source of funding.	While the link to Ch 3 is appreciated, added to Section 4.5.3 where more of the funding and path forward discussion occurs: “Consideration should be given to ways to increase landowner participation in expanded ecosystem service markets. For more information, see Section 3.2.5.”	Yes
G_AC2-08	Ric Reinhardt	Advisory Committee	Recommendation 12: Justin: Not my topic but, arguably, the 2017 Update may be indirectly doing this where it recommends potential legislation to create new financing mechanisms to fund various Plan purposes, some of which may include multi-benefits objectives. (See Investment Strategy.) Otherwise, this may be more of a general fund, may-revise type issue, or could be more appropriately funded through other means (CDFW fees, etc).	Revised Section 4.5.3, 2nd paragraph: “The State would like Congress to support State-sponsored flood risk reduction and ecosystem restoration projects in the WRDA and to enable USACE and FEMA to focus on more proactive participation in State and local efforts. In addition, annual appropriations from the State general fund should be increased in the near term, new funding mechanisms and three precedent-setting general obligation flood bonds should be secured in the longer-term, to fund, in part, the contributions by multiple State agencies to flood management projects.”	Yes
G_AC2-09	Ric Reinhardt	Advisory Committee	Recommendation 13: Ric: The following language is in the 2017 Update - 13 a: - Section 4.5.3 All cost-sharing partners will be asked to contribute significantly more than they have in the past, as historical revenue sources would only be able to fund approximately 20% of needed flood system investment. The State needs Congress to support State-sponsored flood risk reduction and ecosystem restoration projects in the WRDA and to enable USACE and FEMA to focus on more proactive participation in State and local efforts. Annual appropriations from the State general fund should be increased in the near term, and new funding mechanisms and three precedent-setting general obligation flood bonds must be secured in the longer term. While more revenue is required from federal and state governments, local governments will also need to raise additional revenue through mechanisms such as Proposition 218 and any future amendments to that proposition, to meet increased O&M and their cost-share requirements. 13b: Not evident. 13C: CVFPP Update This specific above reference language is in “Perspectives on funding” “Areas of Agreement”. Additional language is needed to clarify that increased cost share will be considered to incentivize implementation of multi benefit projects.	Page 2-26 – Added to Areas of Agreement, “Increased State cost share should be considered to promote implementation of multi-benefit projects, similar to DWR’s Flood Corridor Program and Delta Special Projects.” Added to Section 4.5.3: “The RFMPs have proven extremely valuable in the development of the 2017 CVFPP Update. In order to assist in future updates it would be very beneficial for the State to continue to provide funding to the extent available to the RFMPs or LMAs, especially for those that engage in corridor management plans and project development. An additional State cost-share may be appropriate for disadvantaged communities.” Added to 2nd bullet page 4-34: “With support from federal and local partners, the State would continue to develop and implement efficient regional-scale permitting strategies...”	Yes
G_AC2-10	Ric Reinhardt	Advisory Committee	Recommendation 14: Ric: This is partially addressed in the 2017 update and is the MOOM. Let’s discuss the potential for a task in RFMP 3.0 for the regions to work develop Corridor Management Plans that can be the basis for managing the system to achieve flood control and ecological objectives.	See text for Recommendation 13 in Comment G_AC2-09	No
G_AC2-11	Ric Reinhardt	Advisory Committee	Recommendation 15: Rene, Justin & Ric: The Flood Board resolution adopted with and modifying the 2017 Update could include language to the effect of: In order to support the development of an improved permitting process, building on the success of the Advisory Committee on the Conservation Strategy Measurable Objectives, The Board, will initiate and facilitate a collaborative Advisory Committee on Improved Environmental Permitting that includes DWR, other state and federal permitting agencies and key stakeholders. The AC on Improved Environmental Permitting will focus on the core components of an improved permitting process including a) programmatic permitting, innovative permitting approaches, and the successful permitting of pilot projects. Additionally, The 2017 Update to the CVFPP (section XX) should include language to the effect of: Improved Permitting Process The environmental permitting process, in its current configuration, is expensive, inefficient and remains one of the primary impediments to effective and timely implementation of multi-benefit projects that accomplishing needed management actions within the flood system while also providing environmental uplift. The Advisory Committee on Improved Environmental Permitting should specifically address: The development of programmatic permitting for flood projects including: <ul style="list-style-type: none">o How to integrate the Conservation Strategy Measurable Objectiveso Development of a suite of covered activities related to project construction, O&M, and upkeepo Bundling of projects within and across regions to collectively achieve multiple-benefits	Added to multi-benefit discussion on page 3-44 after “Furthermore, modifications to SPFC facilities can be extremely difficult and costly to permit”: “High costs and inefficiencies in existing regulatory and environmental permitting processes remain among the primary challenges to effective and timely implementation of multi-benefit projects that provide needed flood system performance and associated multi-benefit improvements such as ecosystem uplift.” Note: We had comments from other reviewers that our text was inconsistent with use of “multi-benefit”, and reminder that ecosystem is not the only multi-benefit included in the plan. Added to Section 4.5.3: “The Board may consider establishing a committee similar to the Conservation Strategy Advisory Committee, to evaluate how to improve permitting, reduce the cost of and time required to obtain permits, and improve ecosystem functions and habitats. This committee could address the following: (1) integration of the Conservation Strategy’s measurable objectives, (2) leveraging projects within and across regions to collectively achieve multiple -benefits, (3) leveraging of new legislation such as AB 2087, (4) applying new tools for quantifying and crediting project benefits (5) identifying additional needs for permitting improvements and the pathways to implement them, (6) permitting of pilot projects, applying innovative approaches and refining them, including (a) evaluation of the potential to establish regional plans as Regional Conservation Investment Strategies (RCISs) under AB 2087, (b) estimation of regional plan contributions to ecosystem vitality outcomes along with other multi-benefit outcomes, and (c) identification of proposed regional projects as potential case studies for innovative permitting. Consideration should also be given to	Yes

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			Identification and development of innovative permitting approaches including: <ul style="list-style-type: none">o Leveraging new legislation (e.g. AB 2087)o Applying new tools for quantifying and crediting project benefits (e.g. Central Valley Habitat Exchange, Regional Advanced Mitigation Planning) Identifying additional needs for permitting improvements and the pathways to implement them (e.g. System to track and quantify change to habitat conditions from permitted actions across space and time). <ul style="list-style-type: none">o Permitting of pilot projects, applying these innovative permitting approaches and refining them in the process, including:o Evaluation of the potential to establish Regional Plans as Regional Conservation Investment Strategies (RCISs) under AB2087o Quantification of Regional Plan contributions to CS measurable objectives along with other multi-benefitso Identification of specific regional plan projects as potential case studies for innovative permitting	the lessons learned from regional advanced mitigation, and the Central Valley Habitat Exchange, as it continues to develop.”	
G_AC2-12	Ric Reinhardt	Advisory Committee	<p>Recommendation16: Rene, Justin & Ric: The 2017 Update to the CVFPP (section XX) should include language to the effect of:</p> <p>Innovative Permitting Approaches</p> <p>A number of new and/ or innovative permitting approaches and opportunities exist that could be applied to facilitate the implementation or multi-benefit projects and ongoing operations and maintenance. A detailed evaluation of promising new approaches or initiatives could be a core component of the development of an improved environmental permitting process. The following are examples of specific initiatives with promise for improving project permitting and implementation:</p> <p>- AB 2087 – Though AB2087 does not provide a permit it does allow for regional conservation strategies with measurable objectives to be the basis for a crediting program (Regional Advanced Mitigation Agreement). Under AB 2087, regional conservation program can apply for designation as a Regional Conservation Investment Strategy (CS). CA DFW has recently released (draft) guidelines for RCISs and have indicated that the CVFPP CS meets the RCIS requirements. With this in mind, RFMPs are potentially eligible a) to qualify for RCIS status and b) by quantifying the extent to which RFMP projects advance Objectives, to seek inclusion in an RAMA.</p> <p>- Regional Advanced Mitigation Agreements (RAMA) – The state has developed and established a specific Regional Advanced Mitigation Program (RAMP). In addition to this program, a range of opportunities for RAMAs exist. Through these programs, either or both individual projects or projects that are bundled within an RCIS that create ecosystem benefit beyond their own mitigation requirements could have those benefits quantified and be eligible to have them credited and made applicable to mitigation in other locations where it is biologically appropriate.</p> <p>- Central Valley Habitat Exchange – Applying a regional habitat and conservation planning and advanced mitigation approach requires mechanisms for both a) quantifying the change in habitat value associated with a project or suite of actions in a given area and b) tracking habitat condition (improvement/ impact) in a consistent, quantitative way at a landscape scale. The Central Valley Habit Exchange is a program that creates opportunities private landowners to receive credit and compensation for habitat for at-risk Central Valley wildlife provided on their lands. A core component of the habitat exchange is a Habitat Quantification Tool (HQT) that can be applied to quantify and make transparent the habitat value of a given parcel for specific sensitive species.</p>	<p>Page 3-44 – Updated Regional Conservation Investment Strategies text box: First sentence: Assembly Bill 2087 (Levine), entitled “Regional Conservation Investment Strategies”, was signed by the Governor on September 22, 2016 and represents....that includes conservation goals and objectives for an area.</p> <p>Last sentence: DWR is developing a pilot in Yolo County pursuant to this bill with the California Natural Resources Agency and the Yolo Habitat Conservancy.</p> <p>Revised Section 3.2.4:...and sustainable multi-objective approach to O&M (see text box). This approach should involve close collaboration between stakeholders, and should leverage innovative approaches to managing resources within the SPFC Planning Area, such as the Central Valley Habitat Exchange (see text box), to the extent feasible.</p> <p>Added new text box on page 3-43: Central Valley Habitat Exchange The Central Valley Habitat Exchange (the Exchange) is a program to facilitate effective habitat conservation and mitigation. The Exchange’s long-term goals are to increase opportunities for farmers and ranchers to profit from habitat restoration and conservation outcomes, and to improve public understanding of the environmental return on habitat investments through quantitative and outcome-based reporting.</p> <p>To achieve these goals, the Exchange has developed a multi-species habitat quantification tool (HQT) to measure and track the habitat functionality of conservation and restoration projects. By leveraging the HQT and Exchange support, agencies and plan administrators are able to improve project design and ongoing stewardship to maximize habitat outcomes for species. The Exchange can secure habitat projects that meet both conservation objectives and compensatory mitigation requirements. Exchange credits will be based on habitat functionality as determined by the HQT and can be adjusted to meet permit or program requirements, including permanent and term projects.</p> <p>Added to Section 4.5.3:(after the text listed above under Recommendation #15):</p> <p>Successfully realizing an improved system for permitting projects will require a collaborative effort to successfully permit a suite of pilot projects that can help establish new permitting pathways and procedures, uncover and resolve issues and obstacles, and demonstrate success and the benefits associated with a new approach.</p>	Yes
G_AC2-13	Ric Reinhardt	Advisory Committee	<p>Recommendation 17: Rene, Justin & Ric: The 2017 Update to the CVFPP (section XX) should include language to the effect of:</p> <p>Project Permitting</p> <p>Effective programmatic permitting that both facilitates the implementation and O&M for critical flood safety projects, as well as improving habitat and ecosystem conditions for sensitive species, requires a) measurable, landscape scale conservation objectives and b) the ability for projects to be linked through conservation plans at the intra-regional, regional, or basin scales. In this way, conservation plans become multi-benefit project bundles in which projects that are exclusively for flood management are linked with projects that provide ecosystem uplift. Collectively, the plan can then demonstrate progress against conservation objectives and be permitted programmatically. In this way, use of a larger spatial scale in a permitting framework may support permitting efficiency and allow better achievement of the mix of CVFPP goals.</p> <p>Going forward, project permitting could be facilitated by pathways that leverage programmatic permitting in combination with innovative permitting approaches. For example, RFMPs could become approved as RCISs under the CS, use the CV Habitat Exchange’s HQT to quantify the habitat benefit of a suite of projects relative to the CVFPP CS measurable objectives, be issued a programmatic permit for that suite of projects and apply the habitat credits generated by that project to a regional advanced mitigation program.</p>	Added text to the last paragraph of Section 3.2.4, the second bullet on Page 4-34, section bullet on Page 4-35 stating that programmatic permitting of O&M and flood improvement projects to the extent possible should be further investigated as a potential strategy to add efficiencies and ecosystem improvements at local, regional, and systemwide scales. Efforts for programmatic permitting may be advised or coordinated through the Board’s committees.	Yes

Letter Code	Commenter	Affiliation	Comment	Response	Change in CVFPP?
			Successfully realizing an improved system for permitting projects will require a collaborative effort to successfully permit a suite of Pilot projects that can help establish new permitting pathways and procedures, uncover and resolve issues and obstacles, and demonstrate success and the benefits associated with a new approach.		
G_AC2-14	Ric Reinhardt	Advisory Committee	Recommendation 18: Justin: Channel maintenance is a major theme and concern for our County Farm Bureaus. Would appreciate clarification and/or guidance from DWR as to where this topic is addressed and whether it has been sufficiently and appropriately highlighted in the 2017 Update and accompanying documents, including the recently released Investment Strategy. We need a specific roadmap within the permitting and O&M roadmap that can show us how progress can be made in specific area as well. It is not clear at this point that we have one.	Revised text on page 4-28: “To support future updates of the CVFPP, the FSSR will continue to track changes in physical conditions of SPFC facilities such as levee conditions and channel capacities, but will also be expanded to include a more comprehensive set of performance tracking metrics.” Added to Section 4.5.3: Subsequent collaborative efforts led by the CVFPB and DWR to support the next CVFPP Update may consider (1) channel maintenance requirements and design profiles (e.g., 1955/57 profiles), (2) environmental and hydraulic baselines, and (3) development and implementation of a transparent process, independent from environmental permitting, that applies the CVFPP Conservation Strategy and measurable objectives for both ecosystem uplift and improved flood management to assess and track the contribution of future projects to a functional flood system.	Yes
G_AC2-15	Ric Reinhardt	Advisory Committee	Recommendation 20. The Board continue and build upon the improved collaboration and public outreach that has occurred to date on the CVFPP including, for example, the Coordinating Committee, the RFMPS, DWR outreach, etc.	Added to Section 4.5.3: Moving towards the next CVFPP Update, the CVFPB and DWR will continue to build upon the improved collaboration and public outreach that has occurred to date for the 2017 CVFPP Update, including the RFMPs, work groups and advisory committees, and other communications and engagement that was completed as described in Section 2.3.	Yes
G_AC2-16	Ric Reinhardt	Advisory Committee	Recommendation 22: Justin: Would appreciate clarification, guidance and some commitment and/or action plan from the Flood Board in this area. Alternately, if the topic is or can be addressed directly in the 2017 Update or an accompanying document, this would be helpful as well.	See text for Recommendation 18 in Comment G_AC2-14.	No
G_AC2-17	Ric Reinhardt	Advisory Committee	Recommendation 23: Rene, Justin: The Flood board Resolution adopted along with and modifying the CVFPP 2017 Update could include language to the effect of: “The Board will develop and implement a transparent process, independent of environmental permitting, that applies the CS and measurable objectives for both ecosystem uplift and improved flood management to assess and track the contribution of future projects to a functional flood system. A primary opportunity of the measurable objectives is the ability to track and quantify progress towards a desired outcome. The CVFPP, including the CS, provides a transparent vision for a functional flood system that seeks to meet ecosystem and flood management objectives simultaneously. This provides a tool to use in tracking progress toward the achievement of multi-benefits, and making project-level recommendations, informed in part by the objectives, to support and facilitate flood system function. The intent is that the CVFPP 2017 Update provide guidance and concrete metrics to gauge, monitor, and track both ecosystem and flood performance over time.”	See text for Recommendation 18 in Comment G_AC2-14.	No