

DWR Responses to Comments Related to the Conservation Strategy, SPFC Removal, and Financing Mechanisms (DRAFT) – 6/6/17

This table includes draft comment responses related to the Conservation Strategy, SPFC Removal, and Financing Mechanisms.

Letter Code	Commenter	Affiliation	CVFPP Theme	Comment	Draft Response
G_AC1-01	Ric Reinhardt	Advisory Committee	Conservation Strategy	<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>
G_AC1-02	Ric Reinhardt	Advisory Committee	Conservation Strategy	<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>

G_AC1-03	Ric Reinhardt	Advisory Committee	Adoption of Conservation Strategy	<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 multibenefit 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> <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>
G_AC1-04	Ric Reinhardt	Advisory Committee	Conservation Strategy	<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 backchecked): 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. <i>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.</i> 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 Ordinance Task Force” to identify and recommend</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>

				<p>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>	
G_AC1-05	Ric Reinhardt	Advisory Committee	Conservation Strategy	<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>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>
G_AC1-06	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already</p> <p>Conservation Strategy AC Recommendation: 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: 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 multibenefit 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>
G_AC1-07	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already.</p> <p>Conservation Strategy AC Recommendation: 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: 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</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>

				habitat restoration.	
G_AC1-08	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion, or perhaps was addressed already.</p> <p>Conservation Strategy AC Recommendation: 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>
G_AC1-09	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>Needs more discussion</p> <p>Conservation Strategy AC Recommendation: 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. Nov 2016 CVFPP Conservation Strategy: 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>
G_AC1-10	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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</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</p>

				<p>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: not specifically addressed. Only that the CS is aligned with RFMP and BWFS efforts.</p> <p>CVFPP 2017 Update (selected Recommendations backchecked): 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>	meeting. Refer to response to comment G_AC2-02 for specific revisions.
G_AC1-11	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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 backchecked): Is referenced in CVFPP update and is the MOOM.</p>	The April 20 th 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 9 th CSAC working group meeting. Refer to response to comment G_AC2-03 below for specific revisions.
G_AC1-12	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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 backchecked): CVFPP Update: Page 2-24: Identifies areas for continuing conversation: i.e. increased costs to local flood</p>	The April 20 th 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 9 th CSAC working group meeting. Refer to response to comment G_AC2-04 below for specific revisions.

				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”.	
G_AC1-13	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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 increase 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 multibenefit purposes of Section 9616 (a)(9). To enable progress over time toward achieving intended multibenefit 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 multibenefit projects and structure DWR’s grant process to financially incentivize multi- benefit projects. Successfully implementing multibenefitprojects will additionally require that projects are fully funded and that funding sources are available to implement all project components.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 proposedmechanisms 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 providedbenefits related to flood management, ecosystem enhancement and conservation, and agriculture, secured funding from DWR, U.S. Department of Agriculture conservation programs, andthe 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 singlepurpose flood projectsCVFPP 2017 Update (selected Recommendations backchecked):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>	The April 20 th 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 9 th CSAC working group meeting. Refer to response to comment G_AC2-05 below for specific revisions.
G_AC1-14	Ric Reinhardt	Advisory Committee	Conservation Strategy	<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</p>	The April 20 th 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 9 th CSAC working group meeting. Refer to response to comment G_AC2-06 below for specific revisions.

			<p>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 backchecked): Page 2-25 - identifies this exact comment under “Perspectives on Governance and Institutional Support” as an item for “Areas for Continuing Conversations”.</p>	
G_AC1-15	Ric Reinhardt	Advisory Committee	<p>Financing Mechanisms</p> <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. 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 funds for conservation, examples of State and federal conservation programs that could provide funding for multibenefit projects include the State's Wildlife Conservation Board programs, the Central Valley Project Improvement Act</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>

				<p>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 multibenefit projects also may be eligible for grants from the State’s Greenhouse Gas Reduction Fund.</p> <p>CVFPP 2017 Update (selected Recommendations backchecked): 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	Permitting	<p>Needs more discussion.Conservation Strategy AC Recommendation: 12. The Board consider 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. 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>
G_AC1-17	Ric Reinhardt	Advisory Committee	Financing Mechanisms	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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 costshare 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 backchecked): 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 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</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>

				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 Has this specific above reference language in “Perspectives on funding” “Areas of Agreement”.	
G_AC1-18	Ric Reinhardt	Advisory Committee	Financing Mechanisms	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 14. The Board address 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: Ch 7. DWR discusses development of regional permitting programs. Page 7-2 his regional approach represents a 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,</p> <p>CVFPP 2017 Update (selected Recommendations backchecked): 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.</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 changes were discussed during the May 9th CSAC working group meeting. Refer to response to comment G_AC2-10 below for specific revisions.</p>
G_AC1-19	Ric Reinhardt	Advisory Committee	Permitting	<p>This has been partially addressed, but needs more discussion.</p> <p>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,</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_AC2-11 below for specific revisions.</p>

				<p>advanced mitigation), the need for significant improvement remains.</p> <p>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 multibenefit projects</p>	
G_AC1-20	Ric Reinhardt	Advisory Committee	Permitting	<p>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 env. Compliance (pg 7-2) in addition to developing a regional permitting program. Pg 7-6 Describes HCP for Feather River.</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_AC2-12 below for specific revisions.</p>
G_AC1-21	Ric Reinhardt	Advisory Committee	O&M	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 18. The Board consider procedures to improve monitoring and enforcement of its easements and better address 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.</p> <p>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 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. Page 2-8 - DWR recognizes the problem - "In particular, more stringent permitting and mitigation</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 below for specific revisions.</p>

				<p>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	Performance tracking	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 23. The Board 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 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>
G_AC1-23	Ric Reinhardt	Advisory Committee	Hydraulic Baseline	<p>This has been partially addressed, but needs more discussion.</p> <p>Conservation Strategy AC Recommendation: 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: 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>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>

				CVFPP 2017 Update (selected Recommendations backchecked): 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.	
G_CFB1-06	Justin Fredrickson	California Farm Bureau	Financing Mechanisms	A. New Funding Mechanisms 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:	Comments provided for each bullet in subsequent comment line items.
G_CFB1-07	Justin Fredrickson	California Farm Bureau	Investment Strategy	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.
G_CFB1-08	Justin Fredrickson	California Farm Bureau	Investment Strategy	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 to opposed to either all three of the options or none or 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.

G_CFB1-09	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>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.</p>	<p>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.</p>
G_CFB1-10	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>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.</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>
G_CFB1-11	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>B. Local Cost-Share Increases and New Funding Mechanisms</p> <p>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 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,</p>	<p>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.</p>

				<p>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.</p>	
G_CFB1-12	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>C. Federal Funding</p> <p>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.</p>	<p>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.</p>
G_CFB1-13	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>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.</p>	<p>Please refer to Scenario 3C in Section 7 of the Draft CVFPP Investment Strategy.</p>
G_CFB1-14	Justin Fredrickson	California Farm Bureau	Investment Strategy	<p>E. 218 Reform</p> <p>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 circumvents 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</p>	<p>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.</p>

				proposed new state funding mechanisms (e.g., local input and governance, return-to-source funding guarantees, clear linkage of benefits, etc).	
G_CFB1-16	Justin Fredrickson	California Farm Bureau	Investment Strategy	<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.
G_CFB1-19	Justin Fredrickson	California Farm Bureau	Investment Strategy	<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.
G_FOR1-01	Ronald Stork	Friends of the River	Adoption of Conservation Strategy	<p>(1) CONSERVATION STRATEGY</p> <p>The Board should adopt the Conservation Strategy as a part of the 2017 Update.</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.
G_GGSA1-03	John McManus	Golden Gate Salmon Association	Adoption of Conservation Strategy	<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</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>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 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>
G_MSJRR1-01	Elizabeth Andrews	ESA	<p>Removal of SPFC Facilities</p> <p>Removal of facilities from the State Plan of Flood Control (SPFC)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:- 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. 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.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.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.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: <i>The [Central Valley Flood Protection Plan] shall include all of the following:...(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</i></p>	<p>DWR acknowledges that potential modification or removal of SPFC facilities has been 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><i>both of the following:(1) The reasons for proposing the removal of the facility from the State Plan of Flood Control. (2) Any additional recommended actions associated with removing the facility from the State Plan of Flood Control.</i> 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. 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. 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_MUSR1-27	Barry O'Regan	Mid and Upper Sacramento River Region	Financing Mechanisms	<p>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.</p>	<p>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.</p>
G_NGO1-05	Cain et al	American Rivers, Sacramento River Preservation Trust, Friends of the River, Audubon California	Conservation Strategy	<p>Our organizations have worked in good faith with DWR and various stakeholders to define measurable 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 measurable outcomes identified in table 2.1. - DWR will not change the measurable outcomes or metrics identified in table 2-1 without first working with 	<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: "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,</p>

			<p>the CVFPB to convene a public process to solicit public input.</p> <p>- 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>	<p>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>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> <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>
G_RP1-05	Michael Cook	River Partners	<p>Removal of SPFC Facilities</p> <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. CWC Section 9614 (h) reads as follows, in part: <i>The [Central Valley Flood Protection Plan] shall include all of the following:...(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:(1) The reasons for proposing the removal of the facility from the State Plan of Flood Control.(2) Any additional recommended actions associated with removing the facility from the State Plan of Flood Control.</i> 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. 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>	<p>See response to G_MSJRR1-01.</p>

<p>G_SRRFA1-05</p>	<p>Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun</p>	<p>Sac River Regions & Flood Association</p>	<p>Financing Mechanisms</p>	<p>A. Funding</p> <p>Issue 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 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> <ol style="list-style-type: none"> 1. How new State assessments layered on top of existing local assessments will be made equitable across all beneficiaries and local agencies. 2. How new State assessments will affect the ability of local agencies to pass new 218 elections to fund future repairs/improvement projects. 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? 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. 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>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: - At the time of these comments, the Investment Strategy Technical Memorandum supporting Chapter 4 of the</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>
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G_SRRFA1-07	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg Fabun	Sac River Regions & Flood Association	Conservation Strategy	<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> <ul style="list-style-type: none"> - 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. - 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>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>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> <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_SRRFA1-10	Tom Fossum, Mike Inamine, Melinda Terry, Fritz Durst, Greg	Sac River Regions & Flood Association	Financing Mechanisms	<p>F. State Flood Insurance Program 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</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</p>

	Fabun			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. Talking Points/Supporting Statements: Discussion for this program likely needs to provide several different options such as:- 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. 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.	State River Basin Assessment) will be explored through a transparent and collaborative committee/workgroup process.
G_YSFB1-03	Dave Burroughs	Yuba-Sutter Farm Bureau	Financing Mechanisms	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 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. Please see Section 7 of the Draft CVFPP Investment Strategy for Scenario 4d that addresses urban, rural, and small community cost shares.
L_COL2-46	Glenn Gebhardt	City of Lathrop	Financing Mechanisms	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.
L_COL2-47	Glenn Gebhardt	City of Lathrop	Financing Mechanisms	P. 4-40, "Recommendations for Funding": a. Under Recommended Actions, 1'1 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	Concur. Document was revised to incorporate the suggested language provided.

			<p>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 reutilizeEI, with 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 developed. in close collaboration with the impacted stakeholders. 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>	
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L_COL2-48	Glenn Gebhardt	City of Lathrop	Financing Mechanisms	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.
L_RD1081-04	Fritz Durst	Reclamation District 108	Financing Mechanisms	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.
L_SJRFCPA1-23	Reggie Hill	San Joaquin River Flood Control Project Agency	Financing Mechanisms	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.
S_DPC1-05	Skip Thomson	Delta Protection Commission	Financing Mechanisms	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. 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. 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	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.

				and Proposition 1 funding sources.	
S_DPC1-06	Skip Thomson	Delta Protection Commission	Financing Mechanisms	<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>	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.
S-DSC1-04	Cassandra Enos-Nobriga	Delta Stewardship Council	Financing Mechanisms	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.
S-DSC1-06	Cassandra Enos-Nobriga	Delta Stewardship Council	Adoption of Conservation Strategy	<p>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.</p> <p>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 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</p>	DWR agrees that the Conservation Strategy is a useful guide for flood management actions. The CVFPP update and it’s 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.

				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.	
T_CFB-01	Justin Fredrickson	Friends of the River	Investment Strategy	<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>	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.
T_CFB-06	Justin Fredrickson	California Farm Bureau	Investment Strategy	<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>
T_RD1081-02	Fritz Durst	Reclamation District 108	Financing Mechanisms	<p>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</p>	Please see response to comment L_RD1081-04.

				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.	
T_RD1081-03	Fritz Durst	Reclamation District 108	Financing Mechanisms	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.
G_AC2-01	Ric Reinhardt	Advisory Committee	Conservation Strategy	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.	The supporting documents that the Board selects to adopt as part of the 2017 CVFPP Update is at the discretion of the Board.
G_AC2-02	Ric Reinhardt	Advisory Committee	Conservation Strategy	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." 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.	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 put forward in the RFMPs contribute to ecological objectives of the CVFPP." 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." 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."
G_AC2-03	Ric Reinhardt	Advisory Committee	Conservation Strategy	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. 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-	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.

				benefit project likely to be built in the 5-year time span of the 2017 Update.	<p>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> <p>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 and the Three Amigos habitat area. Examples that are being planned in cooperation with landowners are the Paradise Cut and Yolo Bypass expansions. Yolo Bypass improvements are planned to include widening the Fremont and Sacramento weirs, fish passage over Fremont Weir, and flood-season rearing of juvenile salmon.</p>
G_AC2-04	Ric Reinhardt	Advisory Committee	Performance Tracking	<p>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.</p>	<p>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.</p> <p>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.</p> <p>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 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.</p> <p>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</p>

					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.
G_AC2-05	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>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.</p>	<p>1. Add to the 3rd bullet on page 1-3, "Among the challenges of managing for multiple purposes is securing adequate funding to comply with increasingly stringent environmental regulations" OR add statement to Page 1-13 (Section 1.4, 2nd paragraph)</p> <p>2. Add to the end of the paragraph on page 4-5, section 4.1.3, "All of the State funding mechanisms may provide a funding stream for multi-benefit projects, including ecosystem components. Each funding mechanism's applicability depends on the nature of the mechanism's revenue stream (ongoing vs. limited-duration capital) and nexus of mechanism's purpose with the proposed action's benefits. For example, because all state taxpayers contribute to the general fund or repayment of a GO bond, activities providing broad public benefit and management would have the strongest nexus. This could include statewide ecosystem benefits provided by some flood management activities. Other funding mechanisms such as federal ecosystem programs also provide funding for ecosystem components of multi-benefit projects."</p> <p>3. Page 4-45: Add the following: The Board may consider making a recommendation to the Legislature to provide sources of funding for the multibenefit elements of the CVFPP."</p>
G_AC2-06	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>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 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).</p>	<p>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):</p> <p>1. Page 3-37, first paragraph: "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. "</p> <p>2. Page 3-37, add a sidebar: Estimating Ecosystem Vitality Contributions from Regional Actions – The three RFMPs in the Sacramento River Basin 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</p>

					updates. Add text to Section 4.5.3: To the extent funds are available; 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	Financing Mechanisms	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, recommend adding 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."
G_AC2-08	Ric Reinhardt	Advisory Committee	Financing Mechanisms	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).	Add to 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.
G_AC2-09	Ric Reinhardt	Advisory Committee	Financing Mechanisms	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 – Add 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." Add 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 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. Add 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...
G_AC2-10	Ric Reinhardt	Advisory Committee	Permitting	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

G_AC2-11	Ric Reinhardt	Advisory Committee	Permitting	<p>Recommendation 15: Rene, Justin & Ric: The Flood Board resolution adopted with and modifying the 2017 Update could include language to the effect of:</p> <p>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.</p> <p>Additionally, The 2017 Update to the CVFPP (section XX) should include language to the effect of:</p> <p>Improved Permitting Process</p> <p>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.</p> <p>The Advisory Committee on Improved Environmental Permitting should specifically address:</p> <p>The development of programmatic permitting for flood projects including:</p> <ul style="list-style-type: none"> o How to integrate the Conservation Strategy Measurable Objectives o Development of a suite of covered activities related to project construction, O&M, and upkeep o Bundling of projects within and across regions to collectively achieve multiple-benefits · 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) o 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). · Permitting of pilot projects, applying these innovative permitting approaches and refining them in the process, including: <ul style="list-style-type: none"> o Evaluation of the potential to establish Regional Plans as Regional Conservation Investment Strategies (RCISs) under AB2087 o Quantification of Regional Plan contributions to CS measurable objectives along with other multi-benefits o Identification of specific regional plan projects as potential case studies for innovative permitting 	<p>Add to multi-benefit discussion on page 3-44 after “Furthermore, modifications to SPFC facilities can be extremely difficult and costly to permit”:</p> <p>“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.”</p> <p><i>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.</i></p> <p>Add to Section 4.5.3:</p> <p>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 the lessons learned from regional advanced mitigation, and the Central Valley Habitat Exchange, as it continues to develop.</p>
G_AC2-12	Ric Reinhardt	Advisory Committee	Permitting	<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> <ul style="list-style-type: none"> - 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 	<p>Page 3-44 – Update 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. Last sentence: DWR is currently developing a pilot in Yolo County pursuant to this bill with the California Natural Resources Agency and the Yolo Habitat Conservancy.</p> <p>Revise Section 3.2.4:...and sustainable multi-objective approach to O&M (see text box). This approach should involve close collaboration between stakeholders and leveraging innovative approaches towards managing resources within the SPFC Planning Area, such as the Central Valley Habitat Exchange (see text box), to the extent feasible.</p> <p>Add new text box on page 3-43:Central Valley Habitat Exchange The Central</p>

				<p>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>Valley Habitat Exchange (the Exchange) is a program to facilitate effective habitat conservation and mitigation in the Central Valley. The long-term goals of the Exchange 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>Add to Section 4.5.3 (after the text listed above under Recommendation #15): 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>
G_AC2-13	Ric Reinhardt	Advisory Committee	Permitting	<p>Recommendation 17: Rene, Justin & Ric: The 2017 Update to the CVFPP (section XX) should include language to the effect of: Project Permitting 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> <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>	<p>Add 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.</p>

G_AC2-14	Ric Reinhardt	Advisory Committee	O&M	<p>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.</p>	<p>Edit 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.” Add to Section 4.5.3: Subsequent collaborative efforts led by the Board 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 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.</p>
G_AC2-15	Ric Reinhardt	Advisory Committee	Stakeholder Engagement	<p>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.</p>	<p>Add to Section 4.5.3: Moving towards the next CVFPP Update, the Board 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.</p>
G_AC2-16	Ric Reinhardt	Advisory Committee	Hydraulic Baseline	<p>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.</p>	<p>See text for Recommendation 18 in Comment G_AC2-14.</p>
G_AC2-17	Ric Reinhardt	Advisory Committee	Conservation Strategy	<p>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.”</p>	<p>See text for Recommendation 18 in Comment G_AC2-14.</p>