RECLAMATION DISTRICT No. 2111

Dead Horse Island P.O. Box 248 Walnut Grove, California 95690

August 16, 2019

Erin Mullin, P.E., Senior Engineer Delta Stewardship Council 980 Ninth Street, Suite 1500 Sacramento, CA 95814

Sent via email to: oal amendRRP1@deltacouncil.ca.gov

Subject: Comments on the Proposed Rulemaking to Implement Delta Plan Amendment

Regarding Delta Levees Investment Strategy

Dear Ms. Mullin:

I would like to comment on the Delta Stewardship Council's proposed changes to §5001 and §5012 in Title 23 of the California Code of Regulations to implement the Delta Levees Investment Strategy (DLIS).

For many years the State has participated in improving levees in the Delta through the subventions program. I have served on several reclamation districts and participated in the subventions program for many years. We have substantially improved several islands in the Delta. The work was done efficiently and has been very effective.

Apparently you folks want to totally change this efficient and very effective program by adding another layer of meddling bureaucracy.

In addition, I note you have created an arbitrary and opaque method to triage the islands into winners and losers. While I don't agree that Dead Horse Island should be cut off from all future funding, I think I understand the motivations. Clearly agriculture is not high on your priority list.

What I don't understand, is why would you cut off funding to East Walnut Grove, however not Walnut Grove on the west side. I would presume it is to protect the wealthy mansions on Grand Island as opposed to housing where the working people live in Walnut Grove.

At this point, I can only quote Burt Lance; "If ain't broke, don't fix it."

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Daniel Wilson, President