

Delta Defenders

August 19, 2019

Via email to oal_amendRRP1@deltacouncil.ca.gov

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

RE: Comments on Proposed Rulemaking to Implement Delta Levee Investment Strategy

Dear Ms. Mullin and Mr. Navasero,

Delta Defenders is a grassroots organization that has members from all over the Delta. The group's purpose is to protect and to defend our Delta communities, our businesses, our homes, and our way of life.

The attached review shows how thoroughly the Economic and Fiscal Impact Analysis fails in analyzing the potentially catastrophic effects of the proposed rulemaking on Delta communities.

/s/ Dan Whaley
Dan Whaley
Facilitator
Delta Defenders
dwhaley500@gmail.com

Economic and Fiscal Impact Analysis of Proposed Amendments to State Investments in the Delta Levees and Levee Risk Reduction

The EFIA fails to consider the existing small and moderate sized businesses in the North Delta. The Clarksburg Sugar Mill has more than a dozen wine tasting businesses as well as a thriving event location that often attracts thousands of patrons for annual events, besides the weekly weddings. The Clarksburg Appellation includes even more wineries and wine tasting locations throughout the Delta. The recent additions of more than 1000 acres of new grapes surrounding Hood will result in new tasting room locations and supporting services. Hood is also home to the remarkable Willow Ballroom, a 10,000 sq foot 600 person occupancy venue that has completed more than 100 weddings. The Willow Ballroom has booked events more than a year out and will continue to expand. Grand Island also includes three remarkable venues that are busy every weekend with weddings and events. South of Grand Island there are several other event centers. All these businesses deserve greater protection than empty islands purchased by Water Contractors.

The EFIA fails to consider the Courtland Stillwater Orchards. This family owned and operated fruit packing facility has huge state of the art climate controlled warehouses. The business employs hundreds annually to pack, store and ship pears, apples, cherries, and kiwis. Trucking deliveries to Raley's and others are a non-stop occurrence nearly year round. Hundreds of seasonal employees rely on this business to support their families. Also in Courtland are the Hemly Pear Cider brewery, and the pear orchards and pear packing shed of Green-Hemly. All these businesses deserving the very highest priority levee protection, these are the true assets of the Delta.

The EFIA fails to analyze the impacts on these fruit facilities, wineries and breweries, or the numerous event venues on the Delta.

The EFIA also fails to consider the impact on marinas on Delta islands marked as "low priority." This includes marinas that line the Sacramento River from Freeport to Discovery Bay.

The proposed regulation also ranks the town of Rio Vista as only "high priority." Rio Vista (2018 population 9,239) had 443 businesses in 2012. The town has not only a downtown with many small businesses, but also hotels, restaurants, and grocery stores that serve the area's tourist industry. The impact on these small businesses is not analyzed in the EFIA.

The proposed regulation also ranks the town of Discovery Bay (2010 population 13,352) as only "high priority." The US census recorded 894 businesses in Discovery Bay in 2012. The impact on these small businesses is not analyzed in the EFIA. Discovery Bay also has many homes with attached boat docks. The proposed regulation fails to consider the impacts on the area's fishing and boating tourism industry.

The proposed regulation also fails to consider the potential fiscal impacts on schools in Clarksburg and Rio Vista.

Equal spending throughout the Delta to maintain the existing system is both fair and logical, unless the objective is to destroy the existing Communities and use tax dollars to benefit the Water Contractors.

Why not maintain the existing system that has survived both drought times and extreme water flow with remarkably little damage. The experts of the NDWA can explain what remarkable benefits that can be realized with reasonable dollars spent on maintaining the existing system.

Please protect our levees and the existing Delta water system. Please reassess your claim that the levees are destined to fail.