



DELTA STEWARDSHIP COUNCIL
A California State Agency

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May 10, 2013

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Mr. John Paasch
California Department of Water Resources
Division of Flood Management
3310 El Camino Avenue, Suite 200
Sacramento, CA 95821

**Subject: COMMENTS ON THE NOTICE OF INTENT TO ADOPT AN INITIAL STUDY/MITIGATED
NEGATIVE DECLARATION FOR THE DELTA FLOOD EMERGENCY FACILITIES IMPROVEMENT
PROJECT, A COMPONENT OF THE DELTA FLOOD EMERGENCY PREPAREDNESS, RESPONSE
AND RECOVERY PROGRAM**

Dear Mr. Paasch:

The Delta Stewardship Council (Council) appreciates the opportunity to comment on the proposed Delta Flood Emergency Facilities Improvement Project (FIP), an element of DWR's Delta Flood Emergency Preparedness, Response, and Recovery Program. As you know, we are in the process of completing a planning effort, initiated by the Delta Reform Act (2009), which charged the Council with developing a comprehensive management plan for the Delta (Delta Plan). The Council anticipates adopting the Delta Plan at our May Delta Stewardship Council meeting. The Act sets forth as State policy the achievement of the coequal goals of water supply reliability and ecosystem restoration (Water Code Section 29702), along with the inherent objective of reducing risks to people, property, and State interests in the Delta by effective emergency preparedness, appropriate land uses, and investments in flood protection (Water Code Sec. 85020(g)).

Specifically, Water Code Section 85305(a) directs the Council to promote effective emergency preparedness in the Delta. Since its inception, Council staff has been working with its partners at DWR, California Emergency Management Agency (CalEMA), and local Delta agencies to advance emergency preparedness in the Delta. The draft Delta Plan makes recommendations that address improvements in emergency preparedness and response, and the Council envisions working closely with its partners to implement those actions defined in the Delta Plan.

"Coequal goals" means the two goals of providing a more reliable water supply for California and protecting, restoring, and enhancing the Delta ecosystem. The coequal goals shall be achieved in a manner that protects and enhances the unique cultural, recreational, natural resource, and agricultural values of the Delta as an evolving place."

– CA Water Code §85054

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Our review of the Initial Study/Mitigated Negative Declaration for the FIP indicated to us that the proposed project would likely improve Delta flood emergency preparedness, response, and recovery efforts by ensuring that the State has appropriate infrastructure and supplies in the Delta to respond to major flood disasters. Because such disasters could have a substantial impact on life and property, as well as critical infrastructure, including State water supply, the Council is supportive of this proposed project and looks forward to its timely implementation. Once all of the elements of DWR's Delta Flood Emergency Preparedness, Response, and Recovery Program are developed and implemented, it will substantially benefit Delta flood risk reduction efforts in alignment with the Council's goals.

With the adoption of the Delta Plan, the efforts of the Council turn to implementing the Delta Plan and promoting the achievement of the coequal goals. As such, the Council invites all proponents of Delta projects to consult with the Council during the project development. Council staff can help facilitate a project that is both successful and consistent with the Delta Plan. With respect to the funding of this project, please recall that Water Code §83002(a)(1) also requires that *"Prior to the design or construction of any project funded pursuant to this paragraph, the California Bay-Delta Authority, or its successor, shall approve the specific project or program."* The Delta Reform Act of 2009 made the Council the successor to the California Bay-Delta Authority. The purpose of the Council's approval is to facilitate funding by DWR for projects consistent with the criteria established in Water Code §83002(a)(1). As the funding for this project is likely derived from this source, the Council recommends that DWR meet with Council staff to define the next steps necessary to facilitate project funding.

If you have any further questions, please don't hesitate to contact me at (916) 445-5891.

Sincerely,

Carl Lischeske
Lead Engineer
Delta Stewardship Council