



CALIFORNIA CENTRAL VALLEY
FLOOD CONTROL
ASSOCIATION

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August 15, 2019

Erin Mullin, P.E., Senior Engineer
Delta Stewardship Council
980-9th Street, Suite 1500
Sacramento, CA 95814

SUBJECT: DLIS Rulemaking - Request for Extension of Public Comment Period

Dear Erin:

The CA Central Valley Flood Control Association (Association) respectfully requests the Council postpone action on the proposed rulemaking for the Delta Levee Investment Strategy (DLIS) currently scheduled for the August 22, 2019 meeting (Item #11).

Under the 2009 Delta Reform Act, consultation with federal, state, and local agencies with responsibilities in the Delta is required for development of the Delta Plan¹ and is specifically required for development of recommendations for prioritizing state's investments in levee maintenance.² While Council staff recently met with DWR, Central Valley Flood Protection Board (CVFPB), and Delta reclamation district representatives on the proposed DLIS regulations, we believe these discussions are insufficient and additional time should be provided before the Council takes action to adopt Resolution 2019-2.

We are particularly concerned that the new definitions proposed in Section 5001 that will limit funding from the Delta Levee Maintenance Subventions program for many islands and are not in alignment with existing authority and responsibilities in statutes³ and CVFPB Resolution 2018-06 and Title 23 regulations.⁴

For these reasons, we hope the Council agrees that extending the comment deadline and postponing action on the proposed regulations will provide the opportunity for further consultation with agencies that have levee maintenance responsibilities. Thank you for your consideration.

Sincerely,

Melinda Terry,
Executive Director

¹ Water Code §85300(b).

² Water Code §85306.

³ Water Code §§8361, 8370, 12642, 12981(c) and 12983.

⁴ Title 23, Article 2, Section 4(v).