

RECLAMATION DISTRICT No. 554

P.O. Box 984
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:

On behalf of the Board of Trustees for Reclamation District No 554 (“District”), I am writing to express concern regarding 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).

The District and other districts charged with maintaining and improving the levees within the Sacramento Delta rely on the Subventions program to provide consistent funding. The Delta districts have executed this responsibility and cost effectively. The Sacramento Delta is vital to the health and wellbeing of all Californians by providing vital habitat, agricultural land and water to communities throughout the state. Placing the financial burden of costly repairs and maintenance solely on the property owners located in the Delta does not equitably allocate the cost based on the benefits received.

In addition, the proposed additional procedural hurdles would add additional costs and time to complete necessary repairs, without improving the safety, functionality or oversight of the State’s financial participation.

More specifically, the proposed priorities favor the wealthy homeowners and not the historic communities and farms where families have been for generations and agricultural employees and their families make a home.

We add our voices to other Delta residents and business owners in asking the Council to consider alternate definitions or avoid significant changes to existing definitions and regulations. We also request an extension of the proposed rulemaking for DSC staff to coordinate with constituents in the Delta, the County of Sacramento Department of Water Resources and the CVFPB in further development of consistent and serviceable Title 23 amendment language.

Thank you for your consideration and we look forward to the further coordination with you and your staff. If you have any questions regarding this letter, please contact Gilbert Labrie at 916-776-9122.

Sincerely,

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A handwritten signature in blue ink, appearing to read "Suzanne Daggert". The signature is written in a cursive style with a large initial "S".

Suzanne Daggert, Secretary

cc: Gilbert Labrie
John Garamendi