



LOCAL AGENCIES OF THE NORTH DELTA

November 21, 2022

SENT VIA EMAIL

(amend.rrp1@deltacouncil.ca.gov, hello@deltacouncil.ca.gov)

Chairperson Virginia Madueño and
Council Members
Delta Stewardship Council
715 P Street, Suite 15-300
Sacramento, California 95814

Erin Mullin, P.E., Senior Engineer
Delta Stewardship Council
715 P Street, Suite 15-300
Sacramento, California 95814

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

Dear Chair Madueño, Council Members, and Ms. Mullin:

This comment letter is jointly submitted by the Central Valley Flood Control Association, Central Delta Water Agency, South Delta Water Agency, and Local Agencies of the North Delta. Attached hereto is a markup of proposed amendments to better address the concerns our entities have stated regarding the current version of the proposed Delta Levee Investment Strategy (“DLIS”) regulations. (Exhibit 1.) These revisions are designed to address the most critical concerns we have about the proposed regulations. We have also included various maps and background information supporting the proposed amendments as Exhibit 2.

At its November 17, 2022 meeting, the Council directed staff to prepare responses to the comments provided by Delta flood control experts and advocates on the rulemaking. Substantively addressing these comments prior to finalizing the proposed DLIS regulations is critical to the success of both DLIS and larger flood planning and control efforts in the Delta. While we appreciate that the Council requested an opportunity to review staff’s draft responses, we believe addressing these concerns (many

Delta Stewardship Council

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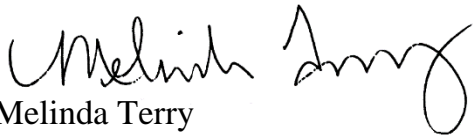
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of which were also raised in prior DLIS proceedings) will require some changes to the text of the regulations.

In order to ensure that the Council has timely information regarding the rulemaking and the opportunity to provide staff proper direction on the completion of the DLIS regulations, we ask that DLIS be placed on the Council's next meeting agenda item for an update, along with further input from the public. We believe that the Council can still complete the rulemaking process within the year provided by the Office of Administrative Law if we move expeditiously. If the rulemaking clock must be restarted, however, that would be superior to adopting the currently flawed DLIS regulations with the unintended consequences we have described.

Thank you for considering the proposed redline changes and for considering our request to place an update on the Council's next agenda to ensure progress is made on DLIS. We look forward to working with the Council to ensure continued progress on flood control in the Delta.

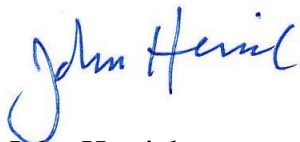
Sincerely,



Melinda Terry
California Central Valley Flood Control
Association



Dante Nomellini, Sr.
Central Delta Water Agency



John Herrick
South Delta Water Agency



Osha R. Meserve
Local Agencies of the North Delta

Attachments:

Exhibit 1 Markup of Proposed DLIS Regulations

Exhibit 2 Maps and Background Information

EXHIBIT 1

**State of California
Delta Stewardship Council**

**California Code of Regulations, Title 23. Water Division 6.
Delta Stewardship Council
Article 1. Definitions Section 5001. Definitions
and
Article 3. Consistency with the Regulatory Policies Contained
in the Delta Plan Section 5012. Prioritization of State
Investments in Delta Levees and Risk Reduction**

Proposed Amendment to Existing Regulation

**(September 23, 2022, Notice of Extension of Written Comment Period
and Continued Hearing for OAL File No. Z2022-0816-07)**

Amend California Code of Regulations, Title 23, section 5001 and section 5012 as follows:

[Note: Set forth below are proposed amendments to Title 23 of the California Code of Regulations. Amendments to existing sections proposed and subject to comment in this rulemaking are shown in underline to indicate additions and strikeout to indicate deletions, compared to the preexisting regulatory language. All other portions remain unchanged and are indicated by the symbol “* * * *” for reference.]

§ **5001. Definitions.** As used in this division, the terms listed below shall have the meanings noted:

* * * *

(v) ~~“High Priority islands or tracts” means the tracts of land listed under “High Priority” in the Table (Delta Levees Investment Strategy Priorities) of Section 5012 of this title and depicted in Appendix P to the Delta Plan.~~

(w) “Levee improvement” means any activity that is not ~~levee operation and maintenance~~ Levee operation, maintenance, repair, rehabilitation and replacement, and that is intended to reduce the probability of flooding to facilitate change in land use or the addition of a feature that did not previously exist. ~~Examples~~ An example of levee improvements ~~would be include~~ changing a levee geometry to reach a higher level of protection to facilitate a change in land use from agriculture to urban use, increasing the height of a levee, providing riprap where none previously existed, and other similar activities.

~~(x) “Levee operation, and maintenance, repair, rehabilitation and replacement” means any activity to retain or maintain the intended functions of flood control facilities and of existing encroachments or needed to keep the system functioning properly. Examples of maintenance activities include mowing, tree and brush trimming and removal, revetment, restoration, rodent control, spraying, painting, coating, patching, burning, and other similar activities but does not include any significant excavation or any excavation during flood season levee work intended to preserve the Delta levee system and the Delta’s physical characteristics in essentially their then present form (Water Code Section 12981, Stats. 1973, c. 717). Included for nonproject levees is all work authorized by Water Code section 12980 et. seq. and 12310 et. seq. and all levee operation, maintenance, repair, rehabilitation and replacement work to achieve, restore and maintain the agricultural standards in DWR Bulletin 192-82 and/or USACE PL 84-99 Delta Agricultural standards with a minimum crown width of 24 feet to allow for raises in freeboard to meet sea level rise and climate change. Included for project levees is all work to meet operation and maintenance requirements including repair, rehabilitation, and replacement as defined in USACE Engineering Regulation ER 1110-401. Such work additionally includes patrols, surveys and inspections, extermination and control of burrowing animals, work on the levee crown to provide adequate access and drainage, restoring levee height, removing vegetation or debris, control of seepage and boils, addressing encroachments, cleaning drains and toe ditches, restoring rock protection, maintenance of levee-related habitat improvement sites, flood fight and repair of flood or other emergency or critical damage.~~

(vz) “Nonnative invasive species,” for purposes of section 5009, means species that establish and reproduce rapidly outside of their native range and may threaten the diversity or abundance of native species through competition for resources, predation, parasitism, hybridization with native populations, introduction of pathogens, or physical or chemical alteration of the invaded habitat.

(waa) “Nonproject levee” means a local levee owned or maintained by a local agency or private owner that is not a project facility under the State Water Resources Law of 1945, Chapter 1 (commencing with Water Code section 12570) and Chapter 2 (commencing with section 12639 of Part 6 of the Water Code).

~~(bb) “Other Priority islands or tracts” means the tracts of land listed under “Other Priority” in the Table (Delta Levees Investment Strategy Priorities) of Section 5012 of this title and depicted in Appendix P to the Delta Plan.~~

(xcc) “Project levee” means a federal flood control levee that is a project facility under the State Water Resources Law of 1945, Chapter 1 (commencing with Water Code section 12570) and Chapter 2 (commencing with section 12639 of Part 6 of the Water Code).

(ydd) “Proposed action” means a plan, program, or project that meets the covered action screening criteria listed in section 5001(j)(1)(A) through (D). Proposed action is also a “covered action,” and therefore subject to compliance with the regulatory policies contained in Articles 2 and 3-if the proposed action meets the covered action screening criterion listed in section 5001(j)(1)(E).

(zee) “Protection” or “protecting,” for purposes of section 5001(h)(2), means preventing harm to the ecosystem, which could include preventing the conversion of existing habitat,

the degradation of water quality, irretrievable conversion of lands suitable for restoration, or the spread of invasive nonnative species.

(aaff) "Regulated stream" means those streams identified in Table 8.1 of California Code of Regulations, Title 23, section 112, under the jurisdiction of the Board.

(bbgg) "Restoration" or "restoring," for purposes of section 5001(h)(2), has the same meaning as in Water Code section 85066. Restoration actions may include restoring interconnected habitats within the Delta and its watershed, restoring more natural Delta flows, or improving ecosystem water quality.

(cchh) "Setback levee" means a new levee constructed behind an existing levee which allows for removal of a portion of the existing levee and creation of additional floodplain connected to the stream. In the Delta, a "setback levee" may not necessarily result in removal of the existing levee.

(ddii) "Significant impact" for the purpose of determining whether a project meets the definition of a "covered action" under section 5001(j)(1)(D) means a substantial positive or negative impact on the achievement of one or both of the coequal goals or the implementation of a government-sponsored flood control program to reduce risks to people, property, and State interests in the Delta, that is directly or indirectly caused by a project on its own or when the project's incremental effect is considered together with the impacts of other closely related past, present, or reasonably foreseeable future projects. The following categories of projects will not have a significant impact for this purpose:

(1) "Ministerial" projects exempted from CEQA, pursuant to Public Resources Code section 21080(b)(1);

(2) "Emergency" projects exempted from CEQA, pursuant to Public Resources Code section 21080(b)(2) through (4);

(3) Temporary water transfers of up to one year in duration.

(4) Other projects exempted from CEQA, unless there are unusual circumstances indicating a reasonable possibility that the project will have a significant impact under Water Code section 85057.5(a)(4), as further defined by this section. Examples of unusual circumstances could arise in connection with, among other things:

(A) Local government general plan amendments for the purpose of achieving consistency with the Delta Protection Commission's Land Use and Resource Management Plan; and

(B) Small-scale habitat restoration projects, as referred to in CEQA Guidelines, section 15333 of Title 14 of the California Code of Regulations, proposed in important restoration areas, but which are inconsistent with the Delta Plan's policy related to appropriate habitat restoration for a given land elevation (section 5006 of this Chapter).

~~(jj) "Very High Priority islands or tracts" means the tracts of land identified under "Very High Priority" in the Table (Delta Levees Investment Strategy Priorities) of Section 5012 of this title and depicted in Appendix P to the Delta Plan.~~

(eekk) "Urban area" means a developed area in which there are 10,000 residents or more.

(ffll) "Urbanizing area" means a developed area or an area outside of a developed area that is planned or anticipated to have 10,000 residents or more within the next 10 years.

(ggmm) “Urban water management plan” means a plan prepared, adopted, and updated by an urban water supplier pursuant to the Urban Water Management Planning Act, Water Code section 10610 et seq.

(hhnn) “Urban water supplier” refers to both “urban retail water suppliers” and “urban wholesale water suppliers”:

(1) “Urban retail water supplier” means a water supplier, either publicly or privately owned, that directly provides potable municipal water to more than 3,000 end users or that supplies more than 3,000 acre-feet of potable water annually at retail for municipal purposes.

(2) “Urban wholesale water supplier” means a water supplier, either publicly or privately owned, that provides more than 3,000 acre-feet of potable water annually at wholesale for municipal purposes.

(iioo) “Water supplier” refers to both “urban water suppliers” and “agricultural water suppliers,” but for purposes of section 5003, does not include agricultural water suppliers during the time that they may be exempted by section 10853 of the Water Code from the requirements of Parts 2.55 and 2.8 of Division 6 of the Water Code.¹¹

Note: Authority cited: Sections 85210(i), 85210(h), and 85306, Water Code. Reference: Sections 85057.5, 85059, 85058, 85066, 85020, 85054, 85052, 85302(g), 85308, 85300, 10608.12 and 10853, Water Code.

§ 5012. Prioritization of State Investments in Delta Levees and Risk Reduction.

~~(a) Prior to the completion and adoption of the updated priorities developed pursuant to Water Code section 85306, the interim priorities listed below shall, where applicable and to the extent permitted by law, guide discretionary State investments in Delta flood risk management. Key priorities for interim funding include emergency preparedness, response, and recovery as described in paragraph (1), as well as Delta levees funding as described in paragraph (2).~~

~~(1) Delta Emergency Preparedness, Response, and Recovery: Develop and implement appropriate emergency preparedness, response, and recovery strategies, including those developed by the Delta Multi-Hazard Task Force pursuant to Water Code section 12994.5.~~

~~(2) Delta Levees Funding: The priorities shown in the following table are meant to guide budget and funding allocation strategies for levee improvements. The goals for funding priorities are all important, and it is expected that, over time, the California Department of Water Resources must balance achievement of those goals. Except on islands planned for ecosystem restoration, improvement of nonproject Delta levees to the Hazard Mitigation Plan (HMP) standard may be funded without justification of the benefits. Improvements to a standard above HMP, such as that set by the U.S. Army Corps of Engineers under Public Law 84-99, may be funded as befits the benefits to be provided, consistent with the California Department of Water Resources' current practices and any future adopted investment strategy.~~

Priorities for State Investment in Delta Integrated Flood Management

Categories of Benefit Analysis Goals	Localized Flood Protection	Levee Network	Ecosystem Conservation
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4	Protect existing urban and adjacent urbanizing areas by providing 200-year flood protection.	Protect water quality and water supply conveyance in the Delta, especially levees that protect freshwater aqueducts and the primary channels that carry fresh water through the Delta.	Protect existing and provide for a net increase in channel-margin habitat.
2	Protect small communities and critical infrastructure of statewide importance (located outside of urban areas).	Protect flood water conveyance in and through the Delta to a level consistent with the State Plan of Flood Control for project levees.	Protect existing and provide for net enhancement of floodplain habitat.
3	Protect agriculture and local working landscapes.	Protect cultural, historic, aesthetic, and recreational resources (Delta as	Protect existing and provide for net enhancements of wetlands.

(a) Fund levee operation ~~and~~, maintenance, repair, rehabilitation and replacement.

For the purposes of Water Code Section 85306, State investments in levee operation, ~~and~~ maintenance, repair, rehabilitation and replacement of the legal Delta (Water Code section 12220) project levees and nonproject levees shall be prioritized as follows:

(1) For project levees, funding should be prioritized to ensure levees are operated, ~~and~~ maintained, repaired, rehabilitated and replaced: i) in accordance with Code of Federal Regulations, Title 33, Part 208.10, ~~and~~ applicable federal Operation and Maintenance manuals; ii) to regain and maintain active status in federal Public Law 84-99 Rehabilitation Program for federal levee repair funding; and iii) consistent with Central Valley Flood Protection Board Resolution No. 2018-06 for Acceptable Operation and Maintenance of the State Plan of Flood Control; and iv) in accordance with Water Code section 85054 to achieve such in a manner that protects and enhances the unique cultural, recreational, natural resource and agricultural values of the Delta.

(2) For nonproject levees, funding should be prioritized to ensure levees are ~~operated and maintained~~ operated, maintained, repaired, and rehabilitated to: i) protect the Delta's physical characteristics in accordance with Public Resources Code section 12981 and other Delta protection statutes; and ii) comply with the September 15, 1983 Flood Hazard Mitigation Plan for the Sacramento-San Joaquin Delta and otherwise be eligible for FEMA cost share for repairs on levees and other flood control works in accordance with Sections 403 and 406 of the Robert T. Stafford Disaster Relief and Emergency Assistance Act (Stafford Act), 42 U.S.C. 5170b and 5172, and 44 CFR §206.226(a); and iii) in accordance with Water Code section 85054, achieve such in a manner that protects and enhances the unique cultural, recreational, natural resource and agricultural values of the Delta.

(3) Attached hereto as Appendix P-1 is a map of the legal Delta as described in Water Code section 12220. Attached hereto as Appendix P-2 are excerpts from the September 15, 1983 Flood Hazard Mitigation Plan for the Sacramento-San Joaquin Delta which lists and maps

the levee system areas intended to be improved to DWR Bulletin 192-82 / PL 84-99 Delta levee standards. Attached hereto as Appendix P-3 are excerpts from MWD report on the Freshwater Corridor including maps showing the levees protecting the” Freshwater Corridor” for delivery of water to the SWP and CVP south delta export pumps.

(b) Delta levees investment strategy. In accordance with Water Code section 12981(b), the investment strategy is to improve the system of project and nonproject levees in order to preserve the physical characteristics of the Delta’s and its invaluable resources. The recommended priority is to fund the “Levee operation, maintenance, repair, rehabilitation and replacement” as in (a) above recognizing the overall availability of levee funding, the practical limits on timely accomplishment of work and the need to provide funding for other levee programs consistent with past practices. Urban Project Levee work is expected to be separately funded as in the past. Attached hereto as Appendix P-4 is a map showing LMAs which include urban project levee segments funded through urban levee programs separate from the Delta Levee programs.

~~The priorities listed in the Table 1 below and depicted in Delta Plan Appendix P dated August 2021, which is incorporated herein by this reference as if fully set forth, forth represent the current results from a decision support tool in ongoing development which shall be considered in funding levee work other than “Operation, maintenance, repair, rehabilitation and replacement” as described in (a) above. shall guide State discretionary investments in the improvement of Delta levees, excluding work funded by the Delta Levees Maintenance Subventions Program. The California Department of Water Resources’ funding decisions are subject to its consideration of the benefits, costs, engineering considerations, and other factors. As the California Department of Water Resources selects levee improvement projects for funding through its levee funding programs, it should fund projects at the Very-High priority islands or tracts, before funding projects at High Priority or Other Priority islands or tracts. If available funds are sufficient to fully fund levee improvement projects at the Very-High Priority islands or tracts, then funds for levee improvement projects on High Priority islands or tracts should be funded and after those projects have been fully funded, then levee improvement projects at Other Priority islands or tracts may be funded.~~

Table 1: Delta Levees Investment Strategy Priorities Very High Priority

~~Bacon Island, Bethel Island, Bishop/DLIS-14 (North Stockton), Brannan-Andrus, Byron Tract, DLIS-19 (Grizzly Slough Area), DLIS-28, DLIS-33, DLIS-63 (Grizzly Island Area), Drexler Tract, Dutch Slough*, Hasting Tract, Hotchkiss Tract, Jersey Island, Jones Tract (Upper and Lower), Maintenance Area 9 North, Maintenance Area 9 South, McCormack-Williamson Tract*, McDonald Island, McMullin Ranch, Middle and Upper Roberts Island, New Hope Tract, North~~

High Priority

~~Stockton, Paradise Junction, Reclamation District 17, Ryer Island, Sherman Island, Staten Island, Terminous Tract, Twitchell Island, Upper Andrus Island, Victoria Island, Webb Tract.~~

~~Bouldin Island, Brack Tract, Bradford Island, Cache Haas Area, Central Stockton*, Clifton Court Forebay, DLIS-01 (Pittsburg Area), DLIS-07 (Knightsen Area), DLIS-08 (Discovery Bay Area), DLIS-20 (Yolo Bypass), DLIS-22 (Rio Vista), DLIS-26 (Morrow Island), DLIS-29, DLIS-30, DLIS-31 (Garabaldi Unit), DLIS-32, DLIS-39, DLIS-41 (Joice Island Area), DLIS-44 (Hill Slough Unit), DLIS-55, DLIS-59, Egbert Tract, Fabian Tract, Glanville, Grand Island, Holland Tract, Honker Bay, Kasson District, Libby McNeil, Little Egbert Tract, Lower Roberts Island, Mandeville Island, Mossdale Island, Netherlands, Palm Orwood, Paradise Cut, Pearson District, Pescadero District*, Rindge Tract, River Junction, Shima Tract, Stewart Tract*, Sunrise Club, Tyler Island, Union Island East, Veale Tract, Walnut Grove, Woodward Island, Yolano.~~

Other Priority

~~Atlas Tract, Bixler Tract, Canal Ranch Tract, Chipps Island, Coney Island, Dead Horse Island, DLIS-06 (Oakley Area), DLIS-10, DLIS-15, DLIS-17, DLIS-18, DLIS-25, DLIS-27, DLIS-34, DLIS-35, DLIS-36, DLIS-37 (Chadbourne Area), DLIS-40, DLIS-43 (Potrero Hills Area), DLIS-46, DLIS-47, DLIS-48, DLIS-49, DLIS-50, DLIS-51, DLIS-52, DLIS-53, DLIS-54, DLIS-56, DLIS-57, DLIS-62, Drexler Pocket, Ehrhardt Club, Empire Tract, Fay Island, Glide District, Holt Station, Honker Lake Tract King Island, Lisbon District, Medford Island, Mein's Landing, Merritt Island, Peters Pocket, Pico Naglee, Prospect Island, Quimby Island, Randall Island, Rio Blanco Tract, Rough And Ready Island, Shin Kee Tract, Stark Tract, Sutter Island, Venice Island, Walthall, West Sacramento, Wetherbee Lake, Winter Island, Wright-Elmwood Tract.~~

(c) Annual Report.

(1) The California Department of Water Resources shall submit a written annual report to the Council ~~on or before February~~September 1, as well as present the report to the Council, on State funds distributed or provided by the California Department of Water Resources ~~during the reporting prior fiscal year~~ for levee operation, maintenance, repair, rehabilitation, replacement and improvement projects within the legal Delta. At least 45 days prior to the oral presentation before the Council, the California Department of Water Resources shall submit the written annual report to the Council and make the report publicly available.

(2) The report shall include:

(A) A description of State funds provided for each levee operation, maintenance, repair, rehabilitation, replacement, and improvement program funded during the reporting year;

(B) A list of each levee improvement project proposal submitted to the California Department of Water Resources for funding, regardless of whether the California Department of Water Resources awarded funding to the project;

(C) A list of the improvement projects awarded funding, the funding level awarded, the local cost share, and the applicable priority of the island or tract from Table 1 in paragraph (b)(1) where the levee improvement project is located;

(D) A description, for each awarded project, of changes (when completed) to levee geometry, the specific locations of those changes, and expected changes in the level of flood protection provided or standard achieved;

(E) If the California Department of Water Resources awards funds for any levee improvement project that is inconsistent with the priorities identified in paragraph (b)(1), the annual report shall identify for each project: how the funding is inconsistent with the priorities, describe why variation from the priorities is necessary, and explain how the funding nevertheless protects lives, property, or other State interests, such as infrastructure, agriculture, water supply reliability, Delta ecosystem, or Delta communities;

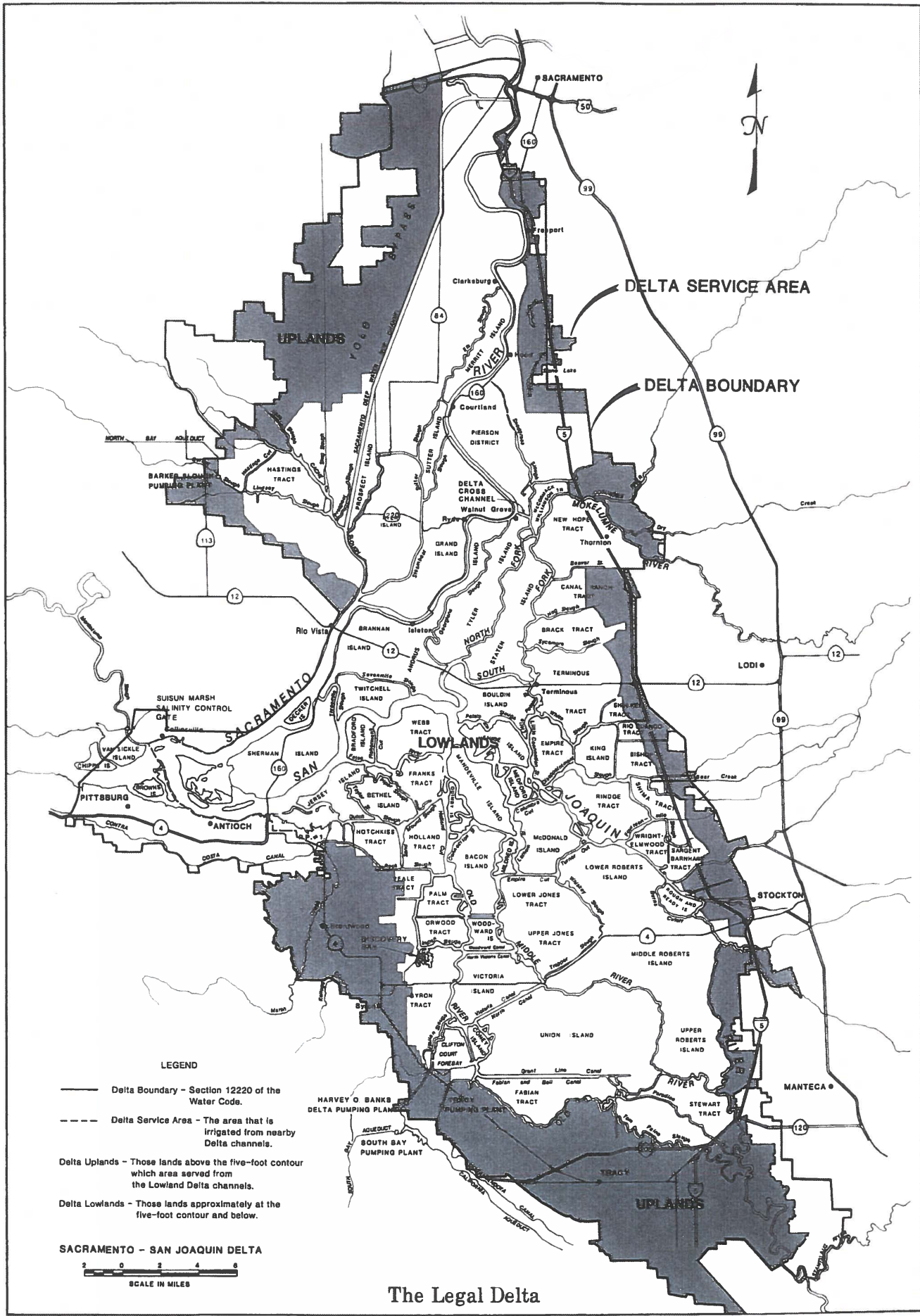
(F) A summary of The California Department of Water Resources' rationale for levee improvement project proposals submitted, but not awarded funding during the reporting year; and

(G) A summary of all previous California Department of Water Resources funded levee improvement project activities completed during the reporting year and location of those activities.

(b)(d) For purposes of Water Code section 85057.5(a)(3) and section 5001(j)(1)(E) of this Chapter, this policy covers a proposed action that involves discretionary State investments in Delta flood risk management, including levee operations, maintenance, and improvements. Nothing in this policy establishes or otherwise changes existing levee standards.

Note: Authority cited: Sections 85210(i), 85210(h), and 85306, Water Code. Reference: Sections 85020, 85022, 85054, 85057.5, 85300, 85305, and 85306, 85307, and 85309, Water Code

EXHIBIT 2



State of California

FLOOD HAZARD MITIGATION PLAN
FOR THE
SACRAMENTO-SAN JOAQUIN DELTA

Covering Portions of Contra Costa, Sacramento,
San Joaquin, Solano, and Yolo Counties

Disaster Declarations
FEMA-633-DR, FEMA-651-DR, FEMA-669-DR
FEMA-677-DR

Prepared by
Department of Water Resources
for
Office of Emergency Services

September 15, 1983

PART V. LONG-TERM MITIGATION PLAN

A. Policy

The long-term mitigation plan is to implement a major levee rehabilitation project within 20 years. The State supports the concept of a System Plan as described in the Corps' Draft Feasibility Report, dated October 1982, and in the Department's Bulletin 192-82, Delta Levees Investigation, dated December 1982, with the understanding that the local districts may complete construction necessary to comply with federal flood control standards on some islands before a federal flood control project is implemented. All islands should be included in the System Plan for stage construction, as recommended in the Corps' plan.

B. Long-Term Levee Rehabilitation Plan

Based on current information, the following islands and tracts are considered to have the most urgent need of levee rehabilitation:

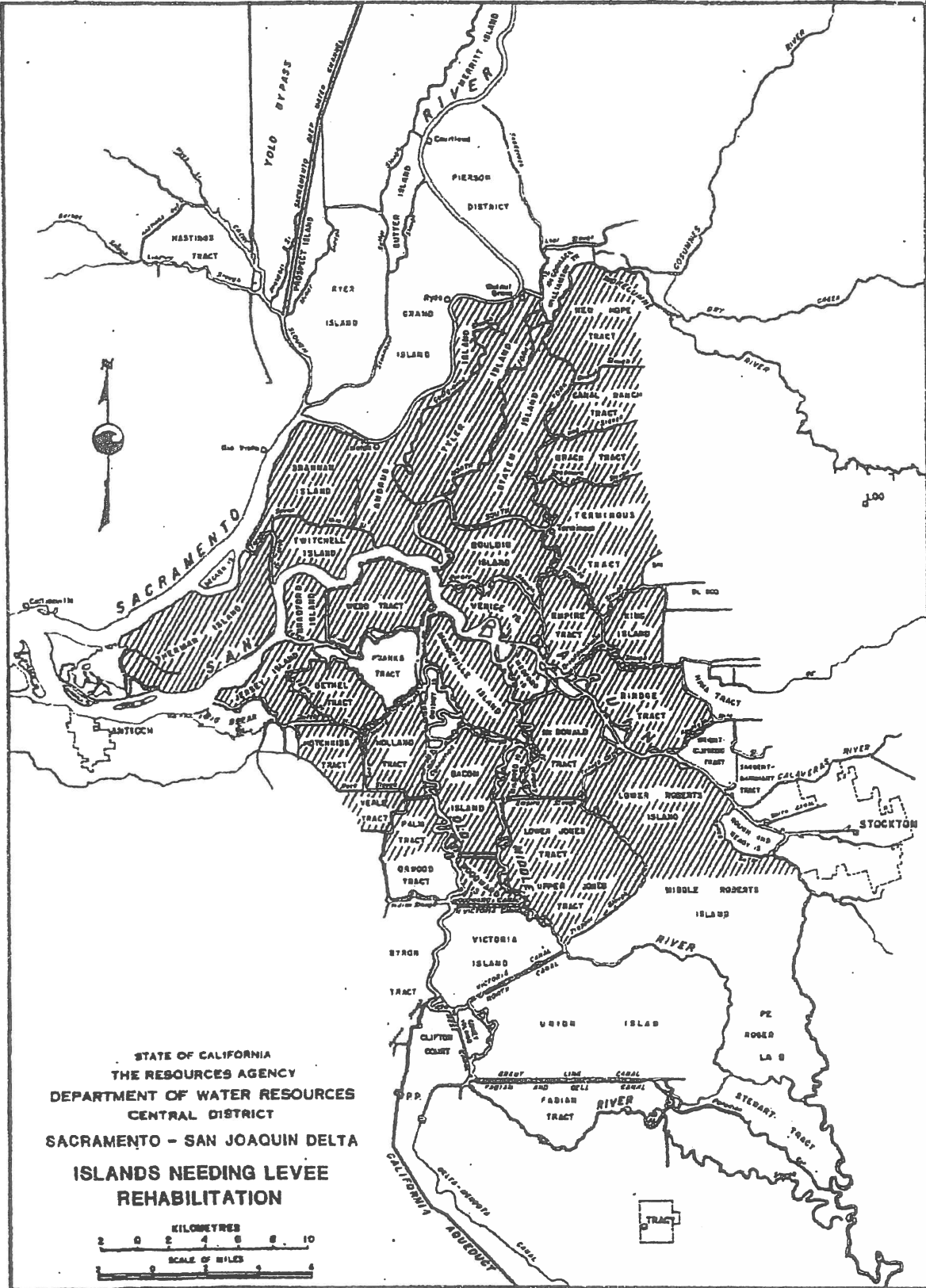
Andrus-Brannan	Hotchkiss	Rindge
Bacon	Jersey	Roberts, Lower
Bethel	Jones, Lower/Upper	Sherman
Bouldin	King	Staten
Brack	Mandeville	Terminus
Bradford	McDonald	Twitchell
Canal Ranch	Medford	Tyler
Dead Horse	Mildred	Venice
Empire	New Hope	Webb
Holland	Palm	Woodward

This list will probably change during the advanced planning stages of the project. (These tracts are shown in Figure 4.)

A joint state-federal levee rehabilitation project requires state legislative and congressional authorizations, funding for detailed planning, and funding for construction. Completion of these actions is expected to take from six to ten years. It is assumed that the funding would be at least 65 percent federal and that the nonfederal funding requirements would be shared 50 percent state and 50 percent local.

In some instances, individual districts have an insufficient economic base to provide even 15 to 20 percent of the cost of modernizing and protecting the island system. In these situations, consideration will be given to a greater State share of such costs, to be reimbursed from subsequent sale or transfer of property rights or value to the State. As an example, public acquisition of land for use in a wildlife management or

FIGURE 4





Update on In Delta Freshwater Pathway

Bay Delta Committee

Item 6a

January 26, 2021

Delta Risks

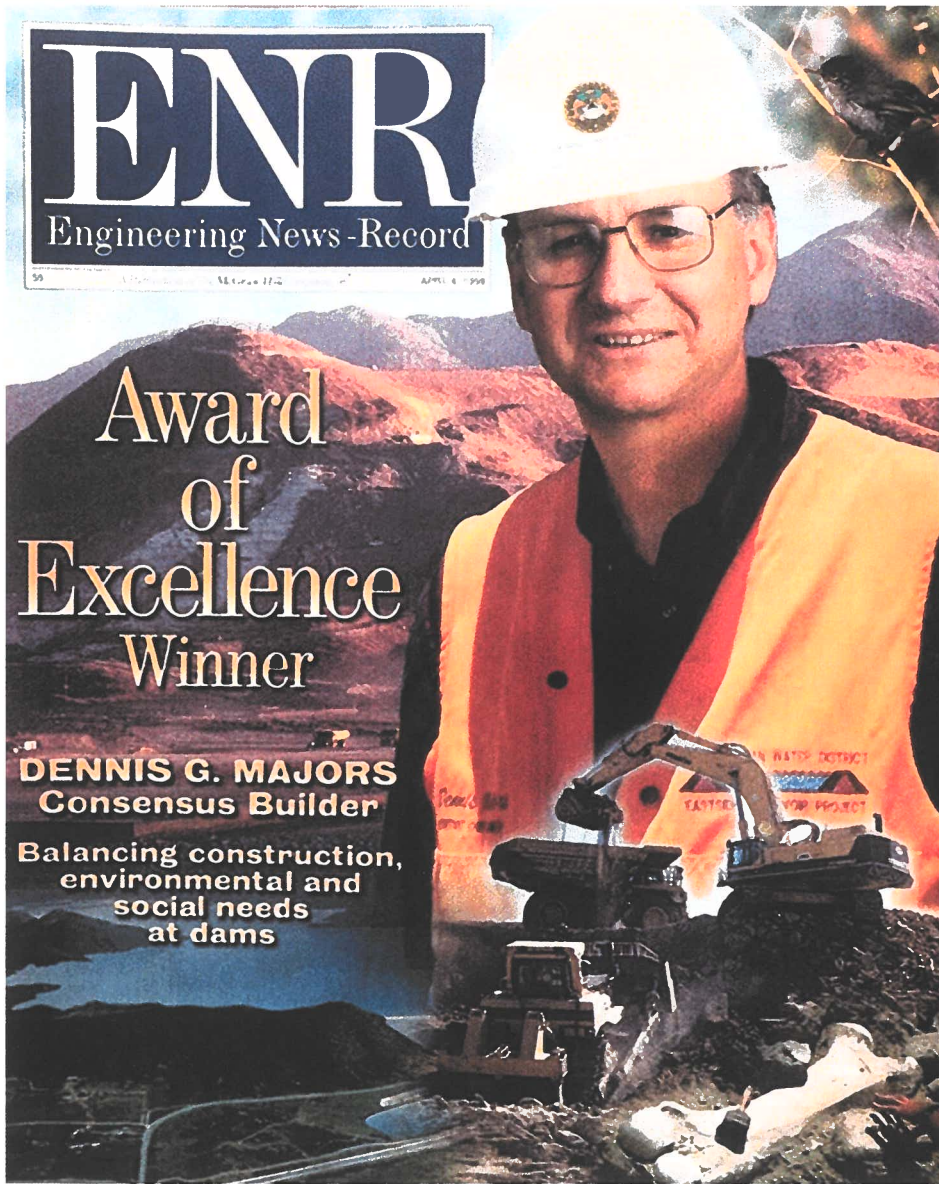
“New Orleans provided 250-year flood protection.

Very few levees in the Sacramento Delta offer even 100-year protection.”

*— Lester Snow, Director,
California Department of Water
Resources (Apr 2006)*



California State Assembly



Delta Risks

“The Delta is the single greatest risk to interrupting SWP/CVP supplies”

– *Dennis Majors, MWD (2007)*

- *MWD Lead – Diamond Valley Lake*
- *USACE Lead – Seven Oaks Dam*
- *Recipient of four national planning, design & construction awards*

Risk Mitigation Options

- Storage Releases
- Operable Barriers
- Freshwater Pathway
 - Pre-Event
 - Levee improvements
 - Material stockpiles
 - Integrated County, State, Fed Plans
 - Post-Event
 - Repair levees
 - Close side channels
 - Recovery <6 months



