



CALIFORNIA CENTRAL VALLEY
FLOOD CONTROL
ASSOCIATION

<i>Executive Director</i>	MELINDA TERRY
<i>President</i>	MIKE HARDESTY
<i>Vice President</i>	LEWIS BAIR
<i>Treasurer</i>	PETE GHELFI

March 26, 2020

Leslie Gallagher, Executive Office
Central Valley Flood Protection Board
3310 El Camino Ave., Room 170
Sacramento, CA 95821
Delivered via email: Leslie.Gallagher@cvflood.ca.gov

SUBJECT: Request No Action on Item 5d (“Statement of No Objection” for Delta Conveyance Project)

Dear Leslie:

The Central Valley Flood Control Association (CCVFCA/Association) requests Item 5d on the March 27, 2020 Agenda, “Statement of No Objection” letter on the Delta Conveyance Project (DCP), be pulled from consent and no action taken.

The size, complexity, and significant alteration of both the Sacramento River Flood Control Project (SRFCP) and hydrodynamics proposed by the DCP is unprecedented. Therefore, the Central Valley Flood Protection Board (CVFPB/Board) has a critical role to play in the review and development of permit terms and conditions to ensure alteration of the federally authorized Civil Works proposed by DWR are not *“injurious to the public interest or impair the usefulness of the USACE project.”*

The Association generally supports early coordination with the U.S. Army Corps of Engineers (USACE) on very large, complex proposals requiring 408 authorization. However, the DCP is still in the initial stages of development and a full project description is not yet available, so it is hard to believe the Board has a sufficient understanding of the scope of the project components and construction activities to support a Statement of No Objection.

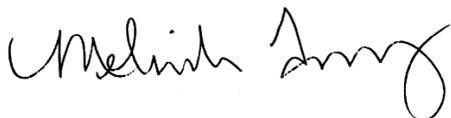
At this early stage, there are other mechanisms available to address these considerations without prematurely initiating the USACE 408 review process, such as: coordination with the CVFPB which itself acts as a guardian of the federally authorized flood control facilities; dialogue with local maintaining agencies who have agreed to OMRR&R of these levees; and with

organizations such as the Association that represent many local flood control interests in the Delta. We urge DWR to instead pursue one of these more appropriate routes.

Moving forward, we would caution the Board to avoid descriptions of the DCP that simply repeat the benefits perceived by the project proponents; otherwise the Board risks appearing to be pre-decisional instead of remaining independent and objective during the 408 review process.

Finally, we are not aware of any urgency necessitating immediate action by the Board in regard to this project. We agree with LAND, that the Board should focus on flood protection projects that are truly necessary for public safety in the short term and revisit this request once people are able to fully participate upon lifting of COVID-19 restrictions on public gatherings. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Melinda Terry". The signature is fluid and cursive, with a large loop at the end of the last name.

Melinda Terry,
Executive Director