

# 2022 Central Valley Flood Protection Plan Update

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
1	Jay Kroeker	Starrh Family Farms	Overall Document	<p>CA has had a magnificent flood protection plan in place for many decades. It's called water storage during wet years to maintain supply for dry years. It has worked extremely well. More water storage needs to be built for the protection of lives and property. Not less. This plan is more theft of water under contract. The ethical approach would be for the DWR or the USBR to buy the land back with contracted water rights at fair market prices.</p>	None.	<p>The CVFPP recognizes the critical role that surface storage reservoirs have in reducing floods in the Central Valley. The CVFPP includes enhancing storage operations with forecast-informed reservoir operations to further amplify potential flood risk reduction and water supply benefits of storage.</p>	No.
2	Chris Elias	San Joaquin Area Flood Control Agency	Overall Document	<p>But I do want to maybe just start by introducing myself. My name is Chris Elias with the San Joaquin Area Flood Control Agency and to really take the time to thank you for paying us a visit today with your field workshop hearing to launch the CF -- CVFPP Plan update that has been rolled out to the community. We're really very grateful that you made the trek. It shows that you do care, first, and that you have immense respect for our community and we really appreciate that.</p> <p>And I also want to let you know that we'll be participating and working with your staff very closely as the Plan has been making its way for the past couple of years now, and will be providing commentary on there. We've been active and -- actively engaged in the evolution of the document.</p> <p>It is a very well done document. And I know there's still more work to be done, but we are delighted by the progress that's been made. Your staff has been very cooperative and collaborative. They've been taking the time to reach out to us, not just us professional staff, but also to our governing board, and that speaks a lot.</p> <p>So thank you for organizing it and really orchestrating the outreach that you've done to really bring this matter to the -- its current state.</p> <p>One of the things that -- a few things that kind of caught my interest, but let me kind of speak to just a couple. First, we are right here right in the heart of Stockton metropolitan area, and not too far from here is the Lower San Joaquin River the main stem, and that in itself, you understand, based on projections will be experiencing well over the -- over three times the current flow that's in that river.</p> <p>The system that is built right now is not meant -- it's not sufficient, you know, to handle that flow and we're working</p>	None.	<p>The CVFPP illustrates the significant flood risks for the Stockton area. Further, the CVFPP recommends accelerated and urgent investment in communities with the highest flood risk and vulnerability.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>very collaboratively again with the State and our federal partners to see what we can do to mitigate.</p> <p>And then in the meantime, our Board, the Board of SJAFCA, has taken a proactive step to develop a policy that essentially allows for us as a community to have the room to make adjustments to our levee system as the conditions worsen. And we are very proud of that proactive effort and looking to the future and finding ways to ensure that we continue to protect our community.</p> <p>So -- but one of the things I wanted to draw attention to is the fact that the level of impact that our community would experience is not matched by the level of investment that we need to make collectively. And as you can tell from 2007 to 2022, based on Jason's presentation, we've invested, as a state, \$3.5 million[SIC] in flood protection activities.</p> <p>And his slide calls for ramping up -- ramping up the investments to be able to do things much more aggressively to raise up about \$30 billion or so, I believe that's the number, in about 30 years. Well, you do the math, if it took us 15 years to invest 3.5 billion, and then we're saying then we need to invest aggressively for the next 30 years, well, it doesn't quite compute, so which means we need to double up our effort as a community.</p> <p>It's not pointing fingers. I'm simply pointing out the fact that maybe we need to find ways to be much more aggressive and creative without we need to go to our federal partners to get them more involved or do much more locally creatively financially to find a way to add not just to our adaptation efforts, but to the mitigation, you know, activities we need to put in place to ensure that we slow the risk that our community will face in the next few years.</p> <p>The climate change itself that's coming and the flows that will follow isn't waiting for the dollars to show up. They don't go one on one. So that means then we have to find ways to get ahead of the curve. So because we don't want to play -- have a Katrina 2.0 play out here, right here in the heart of -- in the heart of Stockton metro. That's one.</p> <p>Then the other thing I wanted to point out is to amplify the last bullet on Mr. Ridley's[SIC] slide and that was about the vulnerable population that's here. Stockton metropolitan area, as you know, is -- has a disproportionate number of population of disadvantaged community. And as I say when we, you know, experience the level of impact that's coming</p>			

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>through the increases in flow that's coming down the main stem, that population is going to be hugely impacted. So hence, we agree with the idea and the emphasis that we need to do more. We need to find a way to ensure that we do view our investments through the lens of equity and social justice.</p> <p>So those are the two points I wanted to kind of leave you with this evening and to again apologize for coming in late. I wanted to be here to welcome you to our valley. But it's never too late. So welcome to Stockton and thank you very much for again paying us a visit and, you know, really having this field visit with us today.</p>			
3	Mark Berry	General Public - Sacramento resident who lives along the American River Parkway Corridor	Overall Document	<p>Okay. Thank you. Thank you. I appreciate the opportunity to speak, President Dolan, and I appreciate the presentations that have been given and the amount of time that's been involved with them. My name is Mark Berry. I live in the Sacramento area along the American River Parkway corridor.</p> <p>And I just wanted to make a couple comments and I think the prior speakers addressed these. But, you know, to reduce flood risks, federal, State, and local agencies have expended, you know, over \$2.2 billion for modifications to the Folsom Dam and for levee improvement projects to increase channel capacity. You know, given the billions of public dollars that have been expended to reduce Sacramento's flood risk, I'm concerned why should the State allow projects that fill in the floodplain that reduce flood carrying capacity and increase flood risk.</p> <p>In this regard, you know, as we feel like maybe we're increasing flood protective capacities, I urge the Board to maintain protections that we have had in the past, such as Title 23 of the California Code of Regulation, Division 1, section 113(b) that prohibits the construction of year-round dwellings within an adopted Plan of Flood Control. Section 107 of the Board's regulation prohibits the construction of residential structures within a designated floodway.</p> <p>So in this --in preparing this new Plan, I --you know, I urge the Board to maintain these protections, even though we may feel historic capacity has increased by these publicly funded projects.</p> <p>You know, in essence, we need room for rivers to be rivers. And I think that was stated in the presentations here. With climate change, historic modeling may be problematic and future floodplains should, you know -- you know, the future floodway plans should be maintained, so that private profit --</p>	None.	The CVFPP promotes wise use of floodplains throughout the Central Valley, including making room for rivers. Consistent with this direction, the CVFPB regulates floodway encroachments through Title 23 of the California Code of Regulations. A figure is being added to Chapter 4 listing the CVFPB's current programs.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>private for profit residences that reduce a flood capacity are not allowed to increase.</p> <p>That's -- that's what I'd like to see involved in the Plan. I didn't see mention of these regulations of not filling -- further filling in the floodplain in the existing Plan.</p> <p>Thank you.</p>			
4	Phil Brozek	General Public - Professional Engineer in Private Practice	Overall Document	<p>Good morning. My name is Phil Brozek, professional engineer in private practice working currently on two major flood risk management projects in the Central Valley. My question is does the update anticipate increasing the pace of looking at existing reservoirs to apply FIRO or forecast-informed reservoir operations, because it seems like a no-brainer to use all that existing assets with new technology to increase flood protection and water supply potentially without having to build any new dams, just using the existing dams we have. Thank you. Over.</p>	None.	Yes, FIRO is described in Chapters 2 and 3 and is included in the systemwide management actions.	No.
5	Brenda Gustin	General Public - Native Resident of Sacramento and Concerned Citizen	Overall Document	<p>Thank you so much for creating such a thorough draft plan to deal for future flooding in the Sacramento region and for engaging the public. I appreciated having the opportunity to comment at the May 19, 2022 Hearing.</p> <p>I appreciate your professional expertise. These recommendations are respectfully submitted to enhance and/or clarify items in the draft plan.</p> <p>Section 1.1 Context for the 2022 CVFPP Update states that:</p> <p>"The projected impacts of climate change on ecological processes, habitats, and species necessitates a focus on building ecosystem resiliency and restoring ecological and geomorphic processes. This effort will require increasing the pace of multi-benefit project implementation, and an emphasis on nature-based solutions, such as widening river corridors and expanding floodplains to allow riverine habitats and species to be resilient and adaptable to projected changes in temperature, precipitation, and hydrology."</p> <p>Content in bold above emphasizes nature-based solutions, therefore, I wonder if the draft can declare the preservation and maintenance of all existing floodways by not allowing fill-ins or rezoning to allow future development.</p> <p>This section also states plans to expand floodplains. Is it possible to plan the implementation of these expansions first where there is currently no existing development?</p> <p>Specifying areas as described will further reduce the financial demand needed for local and federal funding of flood risk</p>	None.	The CVFPP promotes wise use of floodplains and making room for rivers to support CVFPP and Conservation Strategy goals. DWR is currently piloting a landscape-scale pilot of identifying opportunities for floodplain expansion and restoration for multiple benefits, working with local partners. This work may inform the next CVFPP Update in 2027. Also, please see response to comment 3.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>reduction projects addressed in Section 1.4.2 Local Funding Challenges and 1.4.3 Increased Federal Funding</p> <p>This will help address concerns in 1.3.1 Climate Resilience. Section 1.3.1 states that “Climate change is here and is impacting California now.” Further, that there is an “urgency and resolve with which we must act to adapt to the current threats and prepare for even greater threats in the future.”</p> <p>I would like to see the draft identify all areas along the river that already include nature-based solutions that help provide resiliency and counter the negative effects of climate change on the flood system and ensure they remain intact.</p> <p>Thank you for listening.</p>			
6	Brenda Gustin	General Public - Native Resident of Sacramento	Overall Document	<p>Thank you. Thank you. So thank you, first of all, for creating such a thorough draft plan to deal with the future flooding concerns in Sacramento. And I appreciate you professional expertise and apologize for recommendations you may well have covered from the comments I make tonight.</p> <p>In Section 1.1 of the Plan, it's -- it emphasizes on nature based solutions, such as widening the river corridors and expanding floodplains to allow riverine habitats and species to be resilient and adaptable to projected changes in temperature, precipitation, and hydrology. Because of that -- this, I wonder if the draft can further state the necessity to preserve and maintain all existing floodways by not allowing fill-ins or rezoning to allow development.</p> <p>This section states plans to expand floodplains. And so I wonder is it possible to plan implementation first where there is currently no existing development. Specifying areas as described just now will further reduce the financial demand needed for local and federal funding of flood risk reduction projects addressed in Section 1.42 and 1.43. This could also help in addressing the concerns in 1.31 for climate resilience, wherein Section 1.3 states that climate change is here and is impacting California now. It further states there is an urgency and resolve with which we must act to adapt to the current threats and prepare for even greater threats in the future.</p> <p>I wonder if it's possible to identify in the draft all areas along the river that already include nature-based solutions that help provide resiliency and counter the negative effects of climate change on the flood system and ensure they remain intact.</p>	None.	The CVFPP promotes wise use of floodplains and making room for rivers to support CVFPP and Conservation Strategy goals. DWR is currently piloting a landscape-scale pilot of identifying opportunities for floodplain expansion and restoration for multiple benefits, working with local partners. This work may inform the next CVFPP Update in 2027. Also, please see response to comment 3.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>As I've done my review, I may -- I definitely may have missed some of these, and so yet I wanted to have public comment. So thank you very much for listening.</p>			
7	Matt Conover	General Public - John McCormack Company	Overall Document	<p>Hi. I'm with John McCormack Company. We're in RD 1002, which is on the northwest corner -- northeast corner of the Delta near I-5 and Franklin Boulevard, where the launch shaft for the tunnels will be built and take its southwest diagonal tunneling underneath the Delta, San Joaquin after it takes a diagonal northwest draining southeast from Hood and Courtland. They're projecting that they won't be affected by most likely scenario flooding levels very deeply and that it will subside.</p> <p>But we've had serious flooding here in two or three prior floods that caused the closure of I-5 for weeks. And we were 10 to 15 feet deep. And it's going to be aggravated by the refusal or current plan to not dam the Cosumnes up in the canyon there. And apparently, you're going to try to comply with that. You're already using eminent domain in Rio Vista for mitigation acreage condemning farmlands when the salt water is climbing up the river past the legal limit at the Three Mile Slough area and going up into the Yolo Bypass and Hastings Tract and Cache Slough.</p> <p>And that salinity got up all the way to Courtland in 1937. You can't have salt water being pumped onto crops. We have vineyards among our relatives down at Three Mile Slough. We're going to have that same problem all the way up here, as long as this drought is going. And though the floods can push it on out, it -- the alternating extremes and the projections are going to allow it to come back up again.</p> <p>So this demo project at False River should be adapted for lower end of the sloughs on the westside on the Sacramento River as well, as the Mokelumne. We are potentially going to have active breaking of levees at the head of the Mokelumne River here where Snodgrass Slough comes down and joins into Lost Slough. This is draining the Cosumnes and the Mokelumne. And the Mokelumne and flood waters goes -- gets up high and floods down Lost Slough and comes down overtopping 18-, 20-foot levees.</p> <p>Talking to FEMA and the County about projections with new satellite maps that are going to take four more years to get out, they're talking about mean sea level being four feet higher and us having to lift our buildings five more feet to get out of the active flood heights within the next 10 years.</p>	None.	DWR recognizes the convergence of challenges in the Delta – flood risk, water supply, salinity, agricultural sustainability, and ecosystem needs. Chapter 2 has been updated to note Delta Legacy Community StoryMaps and a link. These StoryMaps characterize the unique issues in these communities.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>And to have the Bay Area Council of Governments asking for breaking down levees, reinforcing the Delta Stewardship Plan idea for expanding these floodplains, being under your map or the Delta Stewardship Council maps and The Nature Conservancy that's buying up land around here, we're under a cross-hatched zoning pattern. It's going to flood all the way up -- most of the reclamation district to --almost to Stone Lakes Refuge. It's real intimidating and we're not getting much traction asking at all levels to do the job of flood control on the Cosumnes. It overflows into the Mokelumne and goes into Lodi, affects Elk Grove with the train that had a levee collapse and derailment of 25 cars.</p>			
8	Jeff Twitchell	General Public - Senior Consultant at GEI	Overall Document	<p>Thank you, Madam President Dolan. Yeah. My name is Jeff Twitchell. And as a senior consultant at GEI Consultants, I've been quite occupied over the past four years with advancing the DWR funded small community flood risk reduction feasibility studies right in Matt Conover's neighborhood for the six Delta legacy communities in Sacramento County and to a lesser degree I also provided some input on the Yolo County communities of Yolo and Knights Landing.</p> <p>I just want to spend a little bit of time talking about the feasibility studies and how I feel they need to be higher elevated in the -- in the -- in your current CVFPP update.</p> <p>The studies for the five Sac County communities were just completed in February of this year. And the City of Isleton's community study is scheduled for completion here before July 1 within the next 40, 45 days. I thought you should -- folks know as well a couple of these communities have submitted pending Prop 68 grant applications accompanying with BRIC NOIs with Cal OES and they're namely for the disadvantage communities of Isleton and Locke to potentially, you know, implement flood risk reduction measures identified in the studies and potentially implement a new flood insurance program for the Delta region -- region that we hope can maybe morph into larger segments of the entire Central Valley project area.</p> <p>A key thing I want to share is that the Sac County projects, part of their DWR funded studies, we developed at the request of the -- George Booth of the --the Floodplain Administrator for the County, is there be story maps -- web-based story maps for each individual community, namely Hood, Courtland, Locke, Ryde, and both sides of Walnut Grove, both east and west. And these --these websites really give you a better idea of what the flood risks are for each of</p>	None.	Thank you for your comment at the Public Hearing and bringing the StoryMaps and work completed to the CVFPP Team. Content has been added to Chapter 2 to reflect this work.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>these communities, which will show you that they're subject to deep flooding in excess of 10 to 15 feet and over some of the rooftops, if the --if there were to be, you know, a levee breach in the area.</p> <p>And it would be also identify the key preferred flood risk reduction management actions, and also obviously they host the reports and the -- and the -- and all the supporting technical appendices.</p> <p>In reviewing, you know, your update plan, including the overview of the regional planning areas, there is unfortunately little or no discussion on the small communities in the Lower Sac North Delta RFMP. It's totally silent, but I think and hope this is largely due to the subject studies not being completed until, you know, recently over this last couple months.</p> <p>So we also noticed that the link for the -- in the current document for the Lower Sac North Delta RFMP is inactive. And at the same time, we're hoping that we could have the county and the City of Isleton's websites linked in the referenced area or ideally in the report itself. It's just some thoughts going forward.</p> <p>To view our study in plain efforts, I think significant progress is being made on the community-based flood insurance program. For the Delta region, with the Delta region GHAD being recently launched by the citizens of Isleton recently here on March -- last -- March 29th. And there's interest I hear by both the Director of DWR and the State Insurance Commissioner's office to further explore community-based insurance programs for not only the Delta, but also, you know, the larger part of the -- the planning area.</p> <p>I just want to hit on a couple -- if I run out of time I can submit these -- these comments in writing. But one common thing that we're finding, and I see it's somewhat consistent too with some of the challenges up in the middle and Upper Sac region, and that's addressing existing known DWR flood system repair sites critical and serious sites that remain outstanding. And I know some of the folks in the -- some of the Delta legacy communities in Hood and Courtland have opened a dialogue with DWR to get some of this attention, but I think there's really a lack of adequate funding available. There's no real funding to take on these multi-year projects. So hopefully this -- the Plan can come up with some solutions on this or advance that effort.</p>			



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
9	Dan Whaley	General Public - Chairman of the Delta Legacy Communities	Overall Document	<p>My name is Dan Whaley. I am the Chairman of the Delta Legacy Communities, a non-profit mutual benefit corporation. And we have a Board member from each of the 11 Delta legacy communities, nine of which are in your Flood Plan. We also include Knightsen and Bethel island.</p> <p>But what -- what we see as significant is that there are real benefits to improving and protecting these levees. And the -- DWR is aware of them, the Flood Protection Plan should include them and how we address that is very important. I noticed in a bunch of this stuff, they talk about a 30-year plan that has to move quickly. Well, right now, if we don't protect the levee system, we're not going to be able to deliver water anywhere.</p> <p>And so the critical sites have to be addressed, otherwise the -- the amount of money that it's going to cost for a failure is unbelievable. And so we will try and submit some written comments. We do appreciate all the work you guys are doing and we know that it's difficult to predict, but science should be current. And we can't let the salt water intrusion occur. As little waters there may be in the reservoirs, we need to keep draining it out and we need to keep using that water to protect our very valuable Delta. And those are my comments.</p> <p>Thank you. Dan Whaley.</p>	None.	Thank you for your comments and attending the virtual hearing. We received your written comments, and responses to Delta Legacy Community comments can be found in comments 168-186.	No.
10	Lisa Phoenix	General Public	Overall Document	<p>Dear, CVFPB members. Thank you for addressing the serious concerns regarding flooding due to climate change facing our Sacramento region. Based on the extensive facts noted in the 288-page public draft, I respectfully request the draft further emphasize the need to maintain existing floodways and expanding existing floodways where there is no existing development to further protect communities, land, habitat, and wildlife. Moreover, I respectfully request that the draft restate, as articulated in existing rules, regulations, State, and federal laws, a commitment to not consider infill and/or development within a greater area near floodways to protect existing communities -- oh near floodways, tourist asset, wildlife and fish habitat for the Sacramento region. State of California and our country is recognize by both federal and State wild and Scenic Rivers Acts. Thank you for your attention to these concerns and for your service.</p>	None.	The CVFPP promotes wise use of floodplains and making room for rivers to support CVFPP and Conservation Strategy goals. DWR is currently piloting a landscape-scale pilot of identifying opportunities for floodplain expansion and restoration for multiple benefits, working with local partners. This work may inform the next CVFPP Update in 2027. Also, please see response to comment 3.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
11	Francis Coats	General Public - Native Resident of Yuba City	Overall Document	Please remember that pursuant to the Public Trust Doctrine, the agency must consider the effect of its decisions on public trust interests including public access to and use of navigable waters; and, the right to fish on state-owned lands and lands formerly owned by the state and transferred after November 8, 1910; and, must provide this consideration in a public coherent manner facilitating public participation in the decision making process. Further. That when transferring state-owned land the state must reserve in the people the absolute right to fish on the land being transferred.	None.	Development of the CVFPP Update has included a robust public engagement and review process, consistent with California Water Code Section 9612(c).	No.
12	Rick Johnson	Sacramento Area Flood Control Agency	Table 4.3	Folsom Dam Raise description is incorrect.	Folsom Dam Raise is part of the SPFC. Please correct this.	While Folsom Dam is not currently legally defined as an SPFC facility, Folsom Dam improvements provide flood risk reduction benefits to downstream areas and SPFC facilities and provide systemwide benefits. Therefore, improvements are considered part of the SSIA. Note in Table 4.3 was removed for clarity.	Yes.
13	Rick Johnson	Sacramento Area Flood Control Agency	Page 2-11	These ARCF projects, including Sacramento Weir widening and fish passage, will provide over 200-year level of protection for urban areas along the Sacramento from the American rivers. ARCF projects are in different stages of design and construction and are scheduled to be completed by 2024.	Consider updating the date of completion - ARCF projects will not be complete until 2026.	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
14	Rick Johnson	Sacramento Area Flood Control Agency	Page 2-22	In reviewing the plan, it is not clear how improvements to deficient levees and long-term O&M investments will be made.	Add more detail. How will the SPFC urban and SPFC nonurban levees that are noted as deficient meet acceptable criteria for current levee freeboard, stability, or seepage design at the assessment water surface elevation? How will the State ensure it has sufficient resources dedicated to long-term O&M for critical improvements to Folsom Dam and ARCF projects?	<p>The CVFPP recommends an SSIA portfolio that includes O&amp;M of urban and nonurban levees and increased funding needs for O&amp;M over time that are shared between the State and local partners. We acknowledge that more funding is historically dedicated to urban levee improvements than nonurban levee repairs; however, the CVFPP promotes broader identification of both structural and nonstructural flood management actions that protect nonurban areas.</p> <p>Additionally, the protection afforded by the entire Folsom Dam facility is widely acknowledged as a key component for flood management in the Sacramento area. Although it is difficult to ensure a stable funding source, the CVFPP team will continue advocating for funding for both long-term improvements as well as OMRR&amp;R of those facilities. To evaluate how the State can ensure it has sufficient resources dedicated to long-term O&amp;M, the CVFPP is adding "Establish an interagency workgroup to investigate current understanding of, and proposed changes to, systemwide OMRR&amp;R, as well as provide an estimation of current and future cost of proper OMRR&amp;R considering resources needed to address additional multi-benefit features and the desire to reduce deferred maintenance." to Table 3.3 Recommendation 9.</p>	Yes.
15	Rick Johnson	Sacramento Area Flood Control Agency	Table 4.3	SAFCA wants to ensure the Yolo Bypass and Systemwide Reservoir Operations are addressed in a State OMMRR&R Program.	SAFCA has developed a Technical Memo with recommendations on long-term operations and management solutions. One of the recommendations is that a programmatic, long-term approach toward multi-benefit system management must be guided by a regional, landscape-scale vision. The vision moves away from the traditional O&M approach. Rather than completing O&M activities focused solely on flood protection along with the associated environmental compliance processes and mitigation, the system is actively managed for flood protection, ecosystem vitality, and other benefits, including agricultural sustainability and economic development, water quality, water supply, and recreation.	DWR will work with SAFCA on how to incorporate the Technical Memo information related to long-term operations and management solutions into the Yolo Partnership efforts and into future updates of the CVFPP as it is further developed. A programmatic, long-term approach toward multi-benefit system management guided by a regional, landscape-scale vision would support CVFPP and Conservation Strategy goals as well as other efforts within DWR to promote and support regional and watershed-scale planning and management for multiple benefits.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
16	Rick Johnson	Sacramento Area Flood Control Agency	Table 4.3	Systemwide OMRR&R funding is needed to cover bypass levees, such as the Lower Elkhorn setback levees and reservoir spillway improvements similar to the Joint Federal Project and Dam Raise Project at Folsom Reservoir.	SAFCA is interested to advance possible funding sources with the State. SAFCA also recommends forming a Systemwide O&M Management and Finance Workgroup to address these recommendations.	The need for significant OMRR&R funding is identified in the plan. O&M of reservoirs are not included in the ongoing investments for the CVFPP because they are predominately attributed to water supply. Reservoirs are systemwide features that affect the SPFC but are not SPFC facilities that Division of Flood Management maintains per CWC 8361. The recommendation to form a Systemwide O&M Management and Finance Workgroup has been added to Table 3.3.	Yes.
17	Rick Johnson	Sacramento Area Flood Control Agency	Table 4.7	Table 4.7 presents information about the recommended timing of the CVFPP investments for each phase by each revenue source for ongoing and capital combined investments. While showing continued investments is good, the 10-year roll up makes it difficult to assess the current 5-year plan's outlook and priorities.	SAFCA suggests data, investments and performance tracking is done on an annual and 5-year basis.	Five-year, near-term investment needs have been noted in the CVFPP Foreword.	Yes.
18	Rick Johnson	Sacramento Area Flood Control Agency	Table 3.3	There are numerous high priority policy recommendations that would be extremely beneficial to implement in the region. Unfortunately, the description in the plan and recommendations section is at a very high level and does not provide sufficient information to demonstrate how implementation of the plan, its policy recommendations, or investment strategy will be undertaken.	Add more details. For example, how does the reader find out more information on how a recommendation is being tackled, what division at DWR would lead the effort, where does the item fall in priority over all the other priority items in the plan that are slated for near-term implementation?	Added the following text ahead of Table 3.3, "As funding and other resources become available to advance these recommendations, DWR and the CVFPP will work with applicable partners to develop implementation plans to advance implementation of these recommendations and inform future CVFPP updates."	Yes.
19	Rick Johnson	Sacramento Area Flood Control Agency	Table 3.3	SAFCA strongly supports the High-Priority Policy Issue Recommendations concerning the 1) Yolo Bypass & Comprehensive Study, 2) Framing Systemwide Operations and Maintenance (O&M), and 3) Funding Long Term O&M as discussed in Section 3.3.5 and Appendix C of the 2022 Plan. and we agree with the recommendations as drafted. However, there is no timeline, staffing resources, or funding details provided for how these priority policy issues will be implemented and made actionable.	Suggest including more specific details on timeline, staffing resources, and dedicated funding for how the YBCS Program will be implemented and made actionable. A clear framework and methodology on how to prioritize, fund, and implement systemwide programs and projects is greatly needed along with a more formal YBCS program with intended outcomes, a well defined and supported governance structure, expected timeframes for planning and implementation and a long term investment strategy. This structured methodology would also make Federal participation, cooperation and funding more likely.	Added the following text ahead of Table 3.3, "As funding and other resources become available to advance these recommendations, DWR and the CVFPP will work with applicable partners to develop implementation plans to advance implementation of these recommendations and inform future CVFPP updates."	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
20	Patrick Meagher	RD784	Page 2-11	Only one of the 5 listed TRLIA projects has been completed since 2017 which is the Goldfields 200-yr. levee. The rest were completed prior to 2017 (circa 2006 to the present time)	Revise the first sentence in paragraph 2 to say something like "The following sections identify actions that support urban level of protection that have been completed since 2006..." There are also other key projects that might want to be added to this list such as the Yuba River Levee Improvements (circa 2013), 1986 Break Repair (circa 2015), and the WPIC Improvements (circa 2018)	Revised opening sentence to "Actions that support urban level of flood protection in the Yuba River Basin that have been completed since 2006 include:"	Yes.
21	Patrick Meagher	RD784	Page R-11	The top of this paragraph says "200-year flood protection for RD784 and City of Marysville with levee improvement projects and enhanced reservoir operations. Yuba City's 200-year level of protection improvements are complete".	Add language that says something like: "RD784's 200 year level of protection improvements are complete".	Revised as requested.	Yes.
22	Mike Rossiter	LSJ/DS RFMP	Page 1-5	Similar to the Sacramento River system, the San Joaquin River System was also pushed to the brink in the February 2017 high flow event. Recommend adding a paragraph to describe the situation on the San Joaquin system.	Description of 2017 high water along the San Joaquin system could include the following or something similar: "February 2017 also brought high flows to the San Joaquin River system. Several of the reservoirs along this system were pushed to the brink and were at capacity; releases from the reservoirs elevated many areas of the San Joaquin River to above flood stages. The San Joaquin River at Vernalis remained above flood stage for approximately 3 weeks in late February and early March 2017. The sustained high flows caused seepage and erosion problems throughout the levee system.	Revised as requested.	Yes.
23	Mike Rossiter	LSJ/DS RFMP	Page 2-12	Recommend moving the Smith Canal photo to be within the "Lower San Joaquin" subsection	Recommend moving the Smith Canal photo to be within the "Lower San Joaquin" subsection	Revised as requested.	Yes.
24	Mike Rossiter	LSJ/DS RFMP	Page 2-17	Outline of LSJRDS region is inconsistent with the previously-defined LSJRDS boundary shown in the figure below:	Coordinate with LSJRDS RFMP leads to so that maps being put out by State and local entities are consistent moving forward. This comment applies to figures throughout the document. Perhaps the CVFPP figures are showing the SJR Basin boundary as opposed to the LSJRDS RFMP region boundary?	DWR followed up with the commenter and confirmed that this change could be discussed for Update 2027 so that the team can work with the region on updating the region boundary to include additional areas to the east that could be impacted by projected climate change flows. These areas are not yet defined.	No.
25	Mike Rossiter	LSJ/DS RFMP	Page R-6	The overview currently reads "SJAFCA's mission is to reduce and manage flood risk, primarily in the urban and urbanizing areas of the region for its member agencies: the City of Stockton; City of Lathrop; City of Manteca; and, San Joaquin County (urban areas only).", which is somewhat inconsistent with SJAFCA's more simplified mission statement.	Recommend changing this to "SJAFCA's mission is to reduce and manage the region's flood risk. SJAFCA, in some cases, will lead projects and programs but will also serve as support to other agencies that deliver flood risk management services."	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
26	Mike Rossiter	LSJ/DS RFMP	Page R-6	A large portion of the LSJRDS region is designated by the State of California as being economically "disadvantaged" or "severely disadvantaged". This is a defining feature of the region, especially with the renewed spotlight on equity and social justice, and should be mentioned somewhere in the spotlight.	Recommend adding a statement after the sentence that says The region has an urban population of approximately 400,000, to say "A large portion of the LSJRDS region is designated by the State of California as being economically "disadvantaged" or "severely disadvantaged" which has impacted the region's ability to secure local financing for flood risk reduction projects."...or something similar	Revised as requested.	Yes.
27	Mike Rossiter	LSJ/DS RFMP	Page R-6	The first bullet point should be re-formatted	In the first bullet, "This agreement was expanded in 2017 to include Cities of Lathrop and Manteca." should be un-bolded. The following should be a new bullet point: "SJAFCA Climate Change Adaptation Policy. This policy was adopted in 2019 to guide formulation of new projects."	Revised as requested.	Yes.
28	Mike Rossiter	LSJ/DS RFMP	Page R-6	Minor edit to the second bullet point	"Frameworks" should be changed to "Framework". "This plan was" should be changed to "These plans were"	Revised as requested.	Yes.
29	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to RD17 Levee Seepage Repair Project bullet point	Recommend deleting "Progress of this project continued with DWR funding." and changing wording to "Construction is underway for this \$70 million project which is receiving funding assistance through the DWR Early Implementation (EIP) Program.	Revised as requested.	Yes.
30	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to Mossdale UFRR bullet point	Recommend deleting "This study has been completed, and the CEQA phase has begun." and changing wording to "This study developed a plan acceptable to both local and State sponsors to achieve a 200-year urban level of protection (ULOP) for the Mossdale Tract Area and meet the requirements of Senate Bill 5. The CEQA phase of this project has been initiated along with preliminary design efforts"	Revised as requested.	Yes.
31	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to USACE LSJRP bullet point	Recommend changing description to: "The Project Participation Agreement (PPA) for this \$1.4B effort has been signed and design on the first reach began in 2020."	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
32	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to levee maintenance bullet point	Recommend changing description to: "LMAs have continued annual maintenance activities, submitted SWIF reports to USACE, and have also completed larger scale erosion and seepage repairs to their levees."	Revised as requested.	Yes.
33	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to 3rd bullet point	Delete "...to achieve project feasible" and reword to "in order to make the project feasible and implementable".	Revised as requested.	Yes.
34	Mike Rossiter	LSJ/DS RFMP	Page R-7	Edit to 4th bullet point	change "implementation" to "implementing"	Revised as requested.	Yes.
35	Mike Rossiter	LSJ/DS RFMP	Page 3-23	Investigation of New Hogan Reservoir modifications and 200yr LOP for City of Stockton are high priorities for the LSJRDS region	Recommend changing the figure to show New Hogan Reservoir as a "Priority Action Location", similar to the rest of the reservoirs that are highlighted in the figure. CVFPP climate change analyses project extreme impacts at New Hogan which threatens the heart of downtown Stockton and surrounding communities. Also recommend listing 200yr LOP for Stockton metro area as "Priority Action Location".	Modified figure in "Regional Flood Management Strategy for the San Joaquin River Basin" spotlight as requested.	Yes.
36	Mike Rossiter	LSJ/DS RFMP	Figure 3.19	Unclear what the red dot is pointing to in Figure 3-19	The LSJRDS Region completed 6 SCFRR studies for: French Camp, Morada, Kasson, Weatherbee Lake, Banta, and Stoneridge. Should all of these locations be included on the map?	Only in-progress or planned projects are displayed on the basin area of interest management action figures. The red dot within the LSJR boundary is pointing to the French Camp system FEMA Letter of Map Revision.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
37	Kevin Siu	County of Sacramento DWR	Page R-9	<p>The following are comments from the County of Sacramento – Department of Water Resources in regards to the Public Draft of the 2022 Central Valley Flood Protection Plan Update.</p> <p>Requesting that the Priorities sub-heading include a separate bullet item for the “Planning and funding of improvements to the levee reach along the east bank of the Sacramento River, south of the Town of Freeport, to protect the large populous urban area and the rural communities.”</p> <p>The County of Sacramento – Department of Water Resources strongly recommends the increased prioritization of necessary repairs and improvements to the ten miles of Sacramento River east bank levee from the cross levee south of the Town of Freeport to downriver of the Town of Hood (Levee Reach).</p> <p>This Levee Reach does not meet state or federal levee standards and it is reported in the Flood Risk Reduction Feasibility Study for Delta Legacy Community of Hood, California that the fragility of this levee has a 1:14 year level of protection, or a 7 percent chance of failure in any year. The issues with the levee include under-seepage, slope instability, through seepage, and erosion. The Levee Reach serves as flood control and the potential for levee failure is of great concern to Sacramento County. The California Central Valley Flood Protection Plan states that there may be more than 16,000 residences at risk and 40,000 people displaced, should there be a failure on the Levee Reach. Furthermore, the Levee Reach serves as flood control for thousands of acres of land and billions of dollars of property improvements. The Sacramento River is an important water supply feature conveying water to millions of Californians.</p> <p>On January 28, 2019, the State of California - Department of Water Resources (CA DWR) met with Sacramento Area Flood Control Agency and County of Sacramento - Department of Water Resources staff and suggested that local agencies could take on the task of repairing the critical and serious sites on the Levee Reach. Upon considering this request, it was decided that repairing the state-owned and maintained levee is not a task that local government should lead and manage, but rather should be led by the entity that owns and maintains the levee.</p> <p>Considering the functions of the Levee Reach, it is critical that design and safety standards are met.</p>	<p>Increasing prioritization of this Levee Reach by working with CA DWR to perform critical repairs.</p> <p>At a minimum, this Levee Reach should be certified to the Code of Federal Regulations 44CFR65.10, as well as meet 200-year flood protection standards for the Urban Level of Flood Protection Criteria including the Urban Levee Design Criteria.</p>	<p>On June 21, 2022, DWR submitted a letter to the Sacramento County Board of Supervisors regarding this issue. The letter noted that the seepage sites described are known to the Department and are being addressed on a system-wide priority basis. DFM is conducting a non-urban levee seepage evaluation to identify and prioritize seepage rehabilitation needs for levees of the State Plan of Flood Control, including the non-urban seepage areas in MA09. Additionally, an erosion site called out in this comment is identified and planned for repair in DFM’s FSRP. Monitoring of all known seepage and erosion sites will continue. DWR will continue operating and maintaining the levee consistent with the USACE Operations and Maintenance Manual for the design level of flood protection turned over from the USACE to the State.</p> <p>Finally, your letter discusses a desire to increase the level of protection of this area from non-urban (100-year) to urban (200-year) protection and requests DWR to provide levee accreditation and comply with 44 CFR 65.10. Increasing the level of protection of an area to urban standards is not the role of the Department. Changes to the design level of flood protection and levee accreditation should be initiated and completed at the local and regional levels and require participation by local, regional, State, and federal entities. To that end, Sacramento County, and SAFCA are the appropriate entities to initiate and lead the effort. Please also be aware that generally State and federal policy does not support increasing level of flood protection where changes allow for urbanizing growth.</p>	No.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
38	Mark Berry	General Public - President of Delta Construction Project Management, Inc.	Overall Document	<p>I appreciate the work you and the CVFPB do for the protection of the citizens of the Central valley. The CVFPP pursues ways to improve flood control reliability through nonstructural methods (e.g. building restrictions and building requirements) and structural methods (e.g. levee strengthening and dam construction).</p> <p>DWR and the Board have worked with State, federal and local agencies to reduce flood risks. Increasing the resiliency of the flood management system during extreme weather events should remain the primary focus. In consideration of potential modifications of the Flood Protection Plan please do not diminish the Designated Floodway.</p> <p>Dam and levee project improvement costs in our region since 1986 have been \$2.2B. The scale of levee modernization needed to avoid damaging floods is said to be vast and cities like Sacramento will need levee upgrades involving hundreds of millions of dollars. Taxpayers fund these projects because we are threatened by natural flooding. Many would believe it is unfair to ask taxpayers to spend dearly on flood control if private projects are allowed to encroach in the floodway with no public benefit, especially as the potential impacts of climate changes are unknown.</p> <p>At the public meeting on May 12, 2022, regarding the Draft 2022 CVFPP Update Overview, I made public comment that increased capacity due to levee and dam improvements should not set precedent for encroachment by private development into the existing DF, especially for those who rely upon nonstructural methods of flood control. Despite structural improvements to increase flood capacity, the demarcation of the DF should not be diminished because of expensive public efforts to increase security.</p> <p>The CVFPP should maintain the existing prohibitions for building residential structures within the existing designed floodway. The CVFPB protections of Title 23 California Code of Regulations (CCR) Waters, Division 1, Section 113(b), prohibits the construction of year-round dwellings within an Adopted Plan of Flood Control absent a Major Variance. Board's regulation Section 113(b) also prohibits the construction of structures for year-round dwellings within Adopted Plans of Flood Control which includes the American River Designated Floodway.</p> <p>Section 107 of the Board's Regulations also prohibits the construction of residential structures within the Designated</p>	None.	The CVFPP promotes wise use of floodplains throughout the Central Valley, including making room for rivers. Consistent with this direction, CVFPB regulates floodway encroachments through Title 23 of the California Code of Regulations. A figure has been added to Chapter 4 that lists the CVFPB's current programs.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>Floodways. Section 107, subsection (g) states, "Structures that are designed to have a minimum effect upon the flow of water ... provided that normally no structures for human habitation will be permitted."</p> <p>The draft CVFPP should not allow the filling in the "gap" in the structured floodway protections which were previously uninhabitable by humans, and which have become part of our river ecosystems. Hundreds of millions of dollars of taxpayer funds are spent on river and wetland restorations which among other things are intended to reduce climate change and its impacts.</p> <p>What benefit would the general public or State gain from a reduction in the currently existing floodway boundaries and allowing for-profit development within historic flood basins that were previously uninhabitable by the CVFPB regulations?</p> <p>In preparing the Draft 2022 CVFPP please do not create the opening in which for-profit development may realign the floodway boundary to build within the Designated Floodway Adopted Plan of Flood Control. Such a plan would be unnecessarily risky from a public safety standpoint, inconsistent course of action from a taxpayer perspective and contrary to accepted floodplain management policy advocated by FEMA, the USA CE, and the Department of Water Resources.</p> <p>The Board should maintain its regulations of the Designated Floodway Adopted Plan of Flood Control. In your considerations of updating the CVFPPP please do not set a precedence for increased urban development projects adjacent to waterways under the Board's jurisdiction.</p> <p>Thank you, the opportunity, to comment.</p> <p>Please add me to the appropriate list to receive notifications about further review with the CVFPP.</p>			

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
39	Cathy Birch	General Public - Sacramento resident	Overall Document	<p>Please do not consider allowing any residential housing developments to occur on Designated Floodway of the American River.</p> <p>There are so little undeveloped areas left that represents home and habitant to a variety of animals, and some of which are endangered.</p> <p>I have lived at the "dead end" of Stirling Park Drive for almost 34 years (adjacent to former Kassis property) and the nature setting of orchards and oak trees, the deer and many other animals is unsurpassed, and has provided much education of nature and beauty for family and friends throughout the years.</p> <p>The current regulations prohibit building dwellings on the designated floodway. Please do not allow change in the regulations, and please keep this area in tact.</p>	None.	The CVFPP promotes wise use of floodplains throughout the Central Valley, including making room for rivers. Consistent with this direction, CVFPB regulates floodway encroachments through Title 23 of the California Code of Regulations. A figure has been added to Chapter 4 that lists the CVFPB's current programs.	Yes.
40	Mary Wright	General Public - Native Resident of Rancho Cordova and Concerned Citizen	Overall Document	<p>I wish to participate in the public comment opportunity in supporting and strengthening the protection of our floodways like the Kassis property in Rancho Cordova. It is my hope that this floodway will be kept intact for the benefit of all.</p> <p>Thank you so much for creating such a thorough draft plan to deal for future flooding in the Sacramento region and for engaging the public. I appreciated having the opportunity to comment at the May 19, 2022 Hearing.</p> <p>I appreciate your professional expertise. These recommendations are respectfully submitted to enhance and/or clarify items in the draft plan.</p> <p>Section 1.1 Context for the 2022 CVFPP Update states that:</p> <p>"The projected impacts of climate change on ecological processes, habitats, and species necessitates a focus on building ecosystem resiliency and restoring ecological and geomorphic processes. This effort will require increasing the pace of multi-benefit project implementation, and an emphasis on nature-based solutions, such as widening river corridors and expanding floodplains to allow riverine habitats and species to be resilient and adaptable to projected changes in temperature, precipitation, and hydrology."</p> <p>Content in bold above emphasizes nature-based solutions, therefore, I wonder if the draft can declare the preservation and maintenance of all existing floodways by not allowing fill-ins or rezoning to allow future development.</p>	None.	The CVFPP promotes wise use of floodplains and making room for rivers to support CVFPP and Conservation Strategy goals. DWR is currently piloting a landscape-scale pilot of identifying opportunities for floodplain expansion and restoration for multiple benefits, working with local partners. This work may inform the next CVFPP Update in 2027. Also, please see response to comment 3.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>This section also states plans to expand floodplains. Is it possible to plan the implementation of these expansions first where there is currently no existing development?</p> <p>Specifying areas as described will further reduce the financial demand needed for local and federal funding of flood risk reduction projects addressed in Section 1.4.2 Local Funding Challenges and 1.4.3 Increased Federal Funding</p> <p>This will help address concerns in 1.3.1 Climate Resilience. Section 1.3.1 states that "Climate change is here and is impacting California now." Further, that there is an "urgency and resolve with which we must act to adapt to the current threats and prepare for even greater threats in the future."</p> <p>I would like to see the draft identify all areas along the river that already include nature-based solutions that help provide resiliency and counter the negative effects of climate change on the flood system and ensure they remain intact.</p> <p>Thank you for listening.</p>			
41	Ric Reinhardt	CCVFCA & FR RFMP	Page 2-11	The Yuba River Basin discussion highlights some of the improvements in the RD 784 basin but not all of them and does not mention the Marysville Ring Levee Project	Add a bullet that similar to the statement for the Sutter Basin. Something like: TRLIA working with local, State and federal agencies completed work for 200 year level of flood protection for the urban portion of the RD 784 levee system. Add another bullet stating: Improvements to the Marysville Ring Levee. Also, not clear what the "Star Bend Improvements" is in reference to. Is it the Star Bend setback levee? If so, that should be listed under the Sutter Basin.	Revised as requested.	Yes.
42	Ric Reinhardt	CCVFCA & FR RFMP	Page R-10	The TRLIA Board will make their ULDC finding for the urban basin on June 14	Change the text to state that the TRLIA program of improvements to the RD 784 urban basin is complete.	Revised as requested.	Yes.
43	Ric Reinhardt	CCVFCA & FR RFMP	Page R-11	The Goldfields, Crossing 21 and Site J improvements were completed in 2021	Update text to move this from "challenges" to "accomplishments".	Revised as requested.	Yes.
44	Ric Reinhardt	CCVFCA & FR RFMP	Feather River Spotlight	The Hallwood Side Channel Project is not mentioned in the draft CVFPP.	Consider adding the following text: The Hallwood Side Channel and Floodplain Restoration Project is a multi-benefit project designed to restore and enhance ecosystem processes with a primary objective of enhancing productive juvenile salmonid rearing habitat to increase the natural production of fall-run and spring-run Chinook salmon ( <i>Oncorhynchus tshawytscha</i> ) and Central Valley steelhead ( <i>O. mykiss</i> ) in the lower Yuba River.	Suggested text was too long to fit on the 2-page Regional Overview. Added "Implementing the Hallwood Side Channel and Floodplain Restoration Project." to the list of priorities for Feather River in response to the comment that the project was missing from the section. Project has been added to the 2022 Conservation Strategy Update as well.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					<p>Planning, permitting, design, and monitoring were initially funded by Central Valley Project Improvement Act (CVPIA via the United States Bureau of Reclamation) grants through the United States Fish and Wildlife Service's Anadromous Fish Restoration Program (USFWS AFRP). Yuba Water Agency is providing funding as the Project's implementation lead with assistance from Proposition 68 and the Wildlife Conservation Board (Proposition 1). The Project is intended to directly address the AFRP doubling goal to increase production of natural anadromous salmonids in the Central Valley. The Project will be implemented over 5 years, divided into four areas/phases and will rehabilitate or enhance up to 157 acres of seasonally inundated riparian floodplain. Phase 1 was implemented in 2019-2020 and created/enhanced 89 acres of seasonally inundated floodplain, 1.7 miles of perennial channels, and 3.7 miles of seasonal channels. Phase 2 was completed in November 2021, in which 34 acres of seasonally inundated floodplain habitat and 1.6 miles of seasonal channels were created, and 24 large woody material structures were installed. Across Phases 1 and 2, approximately 44 acres of riparian vegetation were planted across the combined 123 acres. During Phases 3 and 4, an additional 34 acres of seasonally inundated floodplain habitat will be created. Phase 3 is being implemented in 2022, enhancing 13 areas of seasonally inundated floodplain and creating 0.7 miles of seasonally inundated channels. Phase 4 is funded and is planned to be completed in 2023, enhancing 21 acres of seasonally inundated floodplain and creating 0.9 miles of seasonally inundated channels. An additional 10 acres of riparian planting in Phases 3 and 4 is also planned for 2023. Large woody material will also be installed within the Phase 1, 3, and 4 footprints over the course of the 2022 and 2023 implementation years. Once completed (i.e., Phases 1-4), the Project will result in up to 3-feet of water surface elevation reduction for the 100-year design flow. This water surface elevation reduction is a result of removing 3,200,000 CY of sediment from the floodway, most of which comes from large</p>		

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					linear tailings piles that separate the main channel from its floodplain.		
45	Tom Engler	FR RFMP	Feather River Spotlight	The Hallwood Side Channel Project is not mentioned in the draft CVFPP - in addition this project will contribute substantially to the Conservation Strategy Measurable Objectives	Please see note above from comment #44 and include language regarding progress towards the CS Measurable Objectives.	Suggested text was too long to fit on the 2-page Regional Overview. Added "Implementing the Hallwood Side Channel and Floodplain Restoration Project." to the list of priorities for Feather River in response to the comment that the project was missing from the section. Project has been added to the 2022 Conservation Strategy Update as well.	Yes.
46	Patrick Meagher	RD784 & FR RFMP	Page 2-11	Only one of the 5 listed TRLIA projects has been completed since 2017 which is the Goldfields 200-yr. levee. The rest were completed prior to 2017 (circa 2006 to the present time)	Revise the first sentence in paragraph 2 to say something like "The following sections identify actions that support urban level of protection that have been completed since 2006..." There are also other key projects that might want to be added to this list such as the Yuba River Levee Improvements (circa 2013), 1986 Break Repair (circa 2015), and the WPIC Improvements (circa 2018)	Revised opening sentence to "Actions that support urban level of flood protection in the Yuba River Basin that have been completed since 2006 include:"	Yes.
47	Patrick Meagher	RD784 & FR RFMP	Page R-11	The top of this paragraph says "200-year flood protection for RD784 and City of Marysville with levee improvement projects and enhanced reservoir operations. Yuba City's 200-year level of protection improvements are complete".	Add language that says something like: "RD784's 200 year level of protection improvements are complete".	Revised as requested.	Yes.
48	Tom Trexler	FR RFMP	Chapter 4	The overarching Investment Strategy seems unobtainable as the relative percentages between local, state, and federal is too heavily skewed towards locals and state/federal funding sources are too onerous to obtain (next comment)	Convene a focus group with RFMP leadership and representatives from DWR and CVFPB to dive deeper into this topic. Outcomes may include a redistribution of assumed/planned contributions towards the anticipated costs.	The total CVFPP investment increase was heavily influenced by the priorities recommended by the Regional Flood Management Planning program. To achieve the flood risk reduction goals and societal values articulated in the CVFPP over the next 30 years, much larger contributions are required from all cost-sharing partners. The local cost share in the 2012 and 2017 CVFPP was held at 8% for the total portfolio. The overall local cost share in the 2022 plan has increased to 14% for ongoing investments and 8% capital investments. The cost shares in the plan are the result of an aggregate of varied cost share agreements for a multitude of individual projects within each broader management action category. It is important to note these target cost share ranges are programmatic goals and not prescriptive decisions for specific projects. It is recognized that many local communities can't comply with the cost share requirements for some flood management projects because of the magnitude of costs involved and institutional capacity limitations. To	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
						reflect this, the cost share ranges in this 2022 CVFPP Update consider these financial and institutional capacity limitations. For example, local cost shares by disadvantaged communities have been identified as a barrier to participation in federal programs.	
49	Tom Trexler	FR RFMP	Chapter 4	Funding sources from state and federal funding are increasingly difficult to impossible to obtain due to a number of reasons. The first is that they often require unrelated improvements in other areas such as riparian habitat or recreation. Additionally, when applicants do include measures they may also be denied if the measures are not within the exact project footprint (i.e. bolt on projects). Moreover, grants often prohibit that the funds be used for environmental permitting or mitigation even though they are required by the grant.	As discussed at the CVFPB Coordinating Committee, there should be a high-level discussion that includes representation from RFMP Regions to discuss solutions to grant funding obstacles.	Regional collaboration will be key through applicable committees/workshops to address this issue.	No.
50	Tom Engler	FR RFMP	Feather River Spotlight	Projects in the Wheatland Region are not described.	Levee improvements have been completed on the reach of the Bear River levee that protect the City of Wheatland and were certified as meeting FEMA 100 year requirements, funded in part by the EIP program. A feasibility study funded by the Yuba Feather Flood Protection Program (YFFPP) was completed for the Dry Creek levee protecting the City of Wheatland that identified seepage and stability concerns with repairs estimated at \$15 million. A small community feasibility study has been completed for the remainder of the levee system in the Wheatland Basin that affirmed the Critical erosion site along the Bear River currently being repaired with a setback levee funded through FSRP, geometry concerns along portions of Dry Creek and the Bear River, and identified that the basin could benefit from the development of a relief cut plan in the event of a levee breach to reduce flooding to the City of Wheatland and downstream agricultural areas. This relief cut plan is being further evaluated as part of the update to the Yuba County Flood Operations Plan updates. In addition, the Wheatland basin levee system is currently operated and maintained by Reclamation Districts 817 and 2103. Governance studies completed by the Feather RFMP and the Yuba Water Agency have identified that the basin could be better governed by one consolidated District. In 2021, RD 2103	Provided text was too long for the 2-page regional overview. Added "Levee improvements have been completed on the portion of the Bear River levee that protects the city of Wheatland and was certified as meeting FEMA requirements for 100-year level of protection." to the list of regional accomplishments in response to this comment.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					completed a LAFCo process to annex RD 817 and form a new consolidated assessment district for improved OMRR&R of the basin. Although both successfully passed, some concerned property owners filed a lawsuit that has prevented the consolidation from occurring. However, the consolidated assessment district remains in effect and the two districts have agreed to divide the assessment revenues proportionately and coordinate OMRR&R activities until the consolidation lawsuit is resolved.		
51	Chris Fritz	FR RFMP	Page 1-2	The 2012 CVFPP identified a goal of providing a 100-year level of protection for small communities. However, Chapter 1 now states "up to 100-year" protection for small communities.	Delete the words "up to" (typical throughout document).	Edit not made. "Up to" is intentional and will remain in the document. "Up to" is an accurate statement of both state and federal intent. For example, DWR will fund small community projects that provide up to 100-year LOP depending on local objectives and if projects represent an effective approach to reducing small community flood risk.	No.
52	Chris Fritz	FR RFMP	Page 1-7, 2-15, and 4-30	The plan does a good job of acknowledging and describing the need for improvements to small disadvantaged communities. The plan also highlights a renewed focus on equity, social justice, and on correcting historic inequalities in investment and policy. However, there seems to be a disconnect with implementation of the plan. In the latest proposed State budget for FY 22/23 (where the State currently has a record budget surplus) DWR's Small Community Flood Risk Reduction Program is slated to receive \$0 in funding.	Chapter 4 should include a more robust description on how the implementation of the CVFPP will be achieved. The State should also work with local regional leads through the RFMP process to identify and prioritize funding for projects that improve protection to small disadvantaged communities.	DWR agrees that the Small Communities Program needs are high and it warrants additional funding as identified in the plan. The role of the plan is to support action by others to create policy and funding opportunities. For example, the CVFPP can provide the information and highlight needs for a GO bond and increased general fund contributions; but action is needed from the State legislature, elected officials, and the public to ultimately support and pass a GO bond that could provide funding opportunities. DWR will continue to work hard to secure funding for this program while acknowledging that there is an inherit lag between identifying need and restructuring to provide resources.	No.
53	Chris Fritz	FR RFMP	Page 2-11	There's no such thing as the "Sutter River Basin". Is this intended to be "Feather River Basin"?	Revise and correct (throughout document).	Revised to "Sutter Basin" throughout document.	Yes.
54	Chris Fritz	FR RFMP	Page R-11	"Robinson Rifle" is misspelled under the 'Priorities' section (should be "Robinson Riffle").	Revise and correct.	Revised as requested.	Yes.
55	Chris Fritz	FR RFMP	Page 3-26	In the 'Urban Management Actions' section, the description of what's planned to be completed by 2027 is vague and unclear. The reader of the CVFPP should be able to pick up the	Include information so that the reader can understand the status of where the State is at in providing a 200-year LOP for each urban area (i.e.	While the CVFPP highlights the collective goal of achieving 200-year LOP in the Central Valley urban areas, local agencies, not the State, are	No.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				document and 1) understand (at a high level) the plan for how each urban area will achieve a 200-year level of protection, and 2) what the status is of implementation.	what levee projects are complete, what's funded/in-progress, or where work and funding is still needed).	responsible for achieving 200-year LOP by 2025 to meet SB-5 requirements. While the State is providing leadership and cost share funding to facilitate flood risk reduction projects, local agencies are responsible for identifying the improvements that will achieve 200-yr LOP, implementing those improvements, and ultimately certifying the level of protection. On projects where DWR is a cost-share partner, the status of recently completed and ongoing flood risk projects is provided in the updated FSSR.	
56	Chris Fritz	FR RFMP	Overall Document	The Technical Appendices and some of the support documents were not made available to review by the June 6 Public Draft comment deadline.	DWR should prioritize the planning and RFMP efforts so that local stakeholders have adequate time to review and provide input.	DWR will work to better align releases of public draft plan and the technical summary report for Update 2027.	No.
57	MUSR RFMP	MUSR RFMP	Overall Document	The SSIA, as defined in the 2012 plan and updated in the 2017 Update, state that the target level of projection for small communities is a 100-year level, not, "up to a 100-year level".	Delete the words "up to"	Edit not made. "Up to" is intentional and will remain in the document. "Up to" is an accurate statement of state intent. For example, DWR will fund small community projects that provide up to or equal to 100-year LOP depending on local objectives and if projects represent an effective approach to reducing small community flood risk.	No.
58	MUSR RFMP	MUSR RFMP	Page 1-14	The State has the ability now to ease the local funding challenges now through their grant programs by eliminating retention requirements, speeding up reimbursements, and allowing for advance payments.	None.	DWR Program managers follow current State legal requirements for grants but acknowledge some of the requirements present challenges for local partners.	No.
59	MUSR RFMP	MUSR RFMP	Page 2-16	Clarify inclusion of Hamilton City (RD2140) project spotlight in the Small Communities section.	None.	Hamilton City is included in the Small Communities section because small communities are defined as having a population of less than 10,000 residents. While flood risk reduction planning for Hamilton City pre-dates the CVFPP and the Small Communities Program, DWR believes the project is a great example of a multi-benefit approach for small communities.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
60	MUSR RFMP	MUSR RFMP	Table 2.4	Under "Areas for Continuing Conversation" Significant portions of the SPFC are managed by State MAs. However, State MAs have no available mechanism to fund the planning, design, and construction of multi-year capital improvement type projects. Full SSIA implementation cannot be achieved without SMAs implementing SSIA projects	To ensure equity in implementation of the SSIA, develop policies to support State MAs developing multi-year Capital Improvement Plans to advance the planning, design, and construction of SSIA capital improvement projects	DWR understands this issue and intends to work with the CVFPB and local partners to further develop and evaluate solutions. Note that increasing the level of protection of an area to urban standards is not the role of the Department. Changes to the design level of flood protection and levee accreditation should be initiated and completed at the local and regional levels and require participation by local, regional, State, and federal entities. Please also be aware that generally State and federal policy does not support increasing level of flood protection where changes allow for urbanizing growth. Added "Further discussion is needed between State and local partners on logistics, authority, responsibility, and alignment of legal framework of capital improvements to facilities maintained by the State pursuant to California Water Code section 12878." to areas of continuing conversations.	Yes.
61	MUSR RFMP	MUSR RFMP	Table 2.4	Under "Areas for Continuing Conversation" The approach to multi-benefit should shift from focusing on individual MB projects to incenting overall MB Programs (suites of projects of different types). Within identified MB programs, individual single purpose projects should not be penalized or disincentivized.	Describe how the SSIA in totality is an MB program.	The SSIA supports and promotes a multiple benefit approach across the Central Valley and several flood management programs implement the SSIA. Due to specific local/regional needs and opportunities for multiple benefit projects, it is recommended that multi-benefit actions be identified and evaluated at a regional or watershed scale to inform development and prioritization of individual projects. The SSIA is a comprehensive approach of both structural and nonstructural actions for flood management, a multi-benefit portfolio of actions, and a portfolio of actions that supports formulation of single benefit and multi-benefit projects across local, regional, and watershed scales.	No.
62	MUSR RFMP	MUSR RFMP	Table 2.4	Under "Areas for Continuing Conversation" Invasive Aquatic weeds are impacting fish passage and their control/removal needs to become apart of the routine maintenance program.	None.	Revised as requested. Added "Consideration for including control of invasive aquatic weeds into routine maintenance programs." into areas of continuing conversations.	Yes.
63	MUSR RFMP	MUSR RFMP	Page 3-12	The SSIA was developed without consideration of 'Equity in Flood Risk Reduction', therefore the SSIA need to be reevaluated/revisited/redone particularly on how it addressed equity for rural areas.	None.	Added to recommendation 11 in Table 3.3: "Support advancement of equity across the flood system through refinements to the SSIA in future updates to the CVFPB so that the most vulnerable	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
						communities are addressed in program-level priorities.”	
64	MUSR RFMP	MUSR RFMP	Policy Rec. 6	Add: Improve Equity by revamping grant programs by eliminating retention requirements, speeding up reimbursements, and allowing for advance payments for rural areas and small communities.	None.	DWR agrees there are multiple challenges facing local entities seeking grants. Under current State laws, it is not possible to eliminate retention requirements. It is recommended that grantees work closely with their grant managers to invoice the Department monthly and alert DWR staff to prioritize invoices if the grantee is experiencing cash flow issues. The Department may also have some flexibility for advanced payments, but this is dependent upon the appropriation language or would require legislation. Addressing similar challenges associated with federal grants will require continued conversations and efforts with federal partners.	No.
65	MUSR RFMP	MUSR RFMP	Policy Rec. 9	Add: Prioritize Invasive Aquatic weeds removal and control	None.	Added "Consideration for including control of invasive aquatic weeds into routine maintenance programs. " to areas of continuing conversations. Aquatic weed maintenance will be considered in the development of policy recommendations for the 2027 Update. Content on invasive weed control has also been added to the Conservation Strategy in Sections 2.2.5, 3.4.4, and 3.4.5.	Yes.
66	MUSR RFMP	MUSR RFMP	Policy Rec. 9	Add: To ensure equity in implementation of the SSIA, develop policies to support State MAs developing multi-year Capital Improvement Plans to advance the planning, design, and construction of SSIA capital improvement projects	None.	DWR understands this issue and intends to work with the CVFPB and local partners to further develop and evaluate solutions. Note that increasing the level of protection of an area to urban standards is not the role of the Department. Changes to the design level of flood protection and levee accreditation should be initiated and completed at the local and regional levels and require participation by local, regional, State, and federal entities. Please also be aware that generally State and federal policy does not support increasing level of flood protection where changes allow for urbanizing growth. Added "Further discussion is needed between State and local partners on logistics, authority, responsibility, and alignment of legal framework of capital improvements to facilities maintained by the State pursuant to California Water Code	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
						section 12878." to areas of continuing conversations.	
67	MUSR RFMP	MUSR RFMP	Policy Rec. 11	Add: Ensure bond funding language recognizes and allows for single purpose projects to be implemented under a regional scale, long term MB program.	None.	This is outside of the scope of the CVFPP and is addressed through State Legislative processes.	No.
68	MUSR RFMP	MUSR RFMP	Policy Rec. 10	Add: Revisit SSIA concept to ensure equity can be accomplished	None.	Added to recommendation 11 in Table 3.3: "Support advancement of equity across the flood system through refinements to the SSIA in future updates to the CVFPP so that the most vulnerable communities are addressed in program-level priorities."	Yes.
69	MUSR RFMP	MUSR RFMP	Policy Rec. 10	Add: See Comment 66 above	None.	DWR understands this issue and intends to work with the CVFPB and local partners to further develop and evaluate solutions. Note that increasing the level of protection of an area to urban standards is not the role of the Department. Changes to the design level of flood protection and levee accreditation should be initiated and completed at the local and regional levels and require participation by local, regional, State, and federal entities. Please also be aware that generally State and federal policy does not support increasing level of flood protection where changes allow for urbanizing growth. Added "Further discussion is needed between State and local partners on logistics, authority, responsibility, and alignment of legal framework of capital improvements to facilities maintained by the State pursuant to California Water Code section 12878." to areas of continuing conversations.	Yes.
70	MUSR RFMP	MUSR RFMP	Policy Rec. 10	Add: See Comment 67 above	None.	This is outside of the scope of the CVFPP and is addressed through State Legislative processes.	No.
71	MUSR RFMP	MUSR RFMP	Chapter 4	More specifics are needed to drive implementation of the SSIA	For key deliverables provide schedules, and identify responsible parties tasked with implementation.	The CVFPP lays out a strategic framework for reducing flood risk while supporting multiple benefits through the SSIA. The CVFPP is not a project-specific implementation plan. Project-specific implementation plans should be developed by project proponents and partners. The CVFPP uses implementation information provided by RFMPs and other project proponents to inform the investment need and	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
						implementation phasing, but as a 30-year plan with 5-year updates, all projects are not at the same point in planning, design, or implementation.	
72	MUSR RFMP	MUSR RFMP	Page 4-9	Include local levee maintaining agencies (not just State teams) in the Emergency Management bullet. Include Training as a need of ongoing investment.	None.	Revised as requested.	Yes.
73	CDFW	CDFW	Page R-13	Reference to "advanced mitigation"	Revise to "advance mitigation"	Revised as requested.	Yes.
74	CDFW	CDFW	Table 2.4	Operations and maintenance of the Flood System, Areas of continuing conversation, bullet 2 states "Incorporating maintenance of habitat improvements into flood maintenance requirements could introduce further financial and regulatory burden on maintaining agencies..." Maintenance for habitat improvement projects within the floodway is a current challenge to achieving the goals of the CVFPP.	Recommend including a discussion that speaks to the need for flexibility of maintenance requirements for projects that increase ecosystem functions in the floodway without increasing potential flood risk. There needs to be a conversation between the CVFPB, local maintainers, resource agencies, and NGOs about how to build flexibility into permits and processes that require maintenance for projects that improve ecosystem functions when those improvements come with little to no increases in flood risk. CDFW encourages habitat improvements be designed to avoid the need for ongoing maintenance and increased potential flood risk.	Revised similar to requested.	Yes.
75	CDFW	CDFW	Table 2.4	Multi-benefit project, Areas for continuing, bullet 8 "Achievement of multi-benefit objectives can be challenged by inconsistencies between State, federal, and local agency regulatory mandates." This may be the view of project proponents. However, CDFW believes improved early engagement and coordination by project proponents during project planning and development would lead to inclusion of project components that would alleviate regulatory permitting challenges.	Recommend including a discussion that speaks to the benefits of early engagement and coordination with resource agencies during project planning and development. Also, recommend referencing Conservation Strategy, Appendix G, Multi-benefit Implementation and Permitting subgroup recommendations specific to early engagement with resource agencies.	Table 2.4 bullet 8 quoted in comment reads "Achievement of multi-benefit objectives can be challenged by inconsistencies between State, federal, and local agency regulatory mandates. Promoting and participating in early engagement and coordination with regulatory agencies can improve the permitting process and conservation outcomes." Early engagement is also mentioned in Table 3.3.	No.
76	CDFW	CDFW	Table 2.4	Coordination with Federal Agencies, Areas of continuing conversation, 4th bullet states "A process or multi-agency task force is needed to resolve policy or mandate discrepancies between State and federal agencies." It is unclear which specific policy or mandate discrepancies exist and how they would be resolved. Would this be done through the legislative process? Or is this suggesting a process or roadmap to help multi-benefit projects navigate State and federal regulatory requirements?	Recommend identifying specific policy and mandate discrepancies and the process of how each discrepancy would be resolved.	Added clarity to the bullet regarding O&M. "...between State and federal agencies, particularly focused on discrepancies between USACE operation and maintenance manuals and current State approaches to managing vegetation in the floodway."	Yes.
77	CDFW	CDFW	Table 2.4	Coordination with Federal Agencies, Areas of continuing conversation, 7th bullet states "Continued conversations are	Recommend also speaking to the appropriate time for early engagement and coordination between	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				needed about how to improve early coordination and collaboration amongst State and federal permitting agencies..."	project proponents and State/federal permitting agencies. Ideally, project proponents would include State/federal permitting agencies during project development and planning to increase effective and efficient implementation.		
78	Kathleen Schaefer	General Public	Page 1-2	Flood insurance can also mitigate residual risk.	Consider: Residual risk management actions include operation and maintenance activities; emergency preparedness, response, and recovery activities; affordable flood insurance; and floodplain management activities that help promote risk awareness and sound land use decision-making.	Revised as requested.	Yes.
79	Kathleen Schaefer	General Public	Page 1-4	A major flood event would have significant impacts on not only Central Valley residents, but all Californians and people nationwide.	Without post disaster resources, some small communities may never recover. Much needed workforce housing would be lost. Consider adding a sentence that makes mention of this concern. In other places in the document this concern	Revised as requested.	Yes.
80	Kathleen Schaefer	General Public	Page 1-5	I believe some experts suggest that the 2020 drought contributed to the fact that the SFOC was not triggered by the 2021 events.	Consider adding a comment about climate whiplash and the future challenges and opportunities of abrupt transitions from drought to flood.	Revised as requested.	Yes.
81	Kathleen Schaefer	General Public	Page 1-6	The pandemic poses challenges to emergency response personnel.	Consider adding a comment about the challenges associated with performing emergency operations in a pandemic.	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
82	Kathleen Schaefer	General Public	Figure 1.3 and Table 3.6	Using expected annual life loss paints a false picture of the flood risk and provides no opportunity to accurately measure the results. In section 1.2.1 DWR notes the role of AR5s in the Oroville Dam failure. In section 1.2.2 DWR notes that the Central Valley suffers from drought conditions. The one AR5 year followed by 4 drought years might lead one to suggest that the average estimated loss is quite reasonable and that no significant action is required. Further, it provides no measurable way of proving the success of the program. If there were no lives lost for 4 years due to a drought and on in year 5 an AR resulted in a levee failure where 4.5 times the estimated annual lives lost were actually lost, would DWR consider the project a success? Further, this metric ties DWR to the CVHS, which is based on Bulletin 17C. An independent review team, unanimously recommended that DWR stop using Bulletin 17C.	Studies show that flood losses are directly tied to AR4 and 5 and that ARs1-3 are largely beneficial. Consider implementing two metrics. Consider establishing a metric based on AR1-3 and a metric based on the ARkStorm 2.0 analysis. Consider setting a goal of "no losses associated with AR1-3 events." As AR1-3 events are largely beneficial, a focus on these events could strengthen the relationship with water supply planning. At the other end of the spectrum, the ARkStorm 2.0 scenario will develop a new suite of extreme winter storm meteorological scenarios extracted from climate projections. This work will empower the scientific and emergency management communities with new information on how climate change will impact winter storm emergency planning for the Great Basin, Southwest, and California regions. Many argue that this event is so large that structural measures could never be built to provide protection and thus it is unwise for DWR to spend limited CVFPP resources on such an endeavor. While the full suite of structural defenses for an ARkStorm 2.0 event may be an unattainable target, it provides an opportunity to demonstrate the effectiveness of the program in meeting modern flood resilience goals. This includes improving evacuation and emergency response planning. It might provide maximum loss information for insurance products. Additionally the hydraulics models developed by an ARkStorm 2.0 effort would advance the DWR modeling capabilities.	Both the use of the word "expected annual damages" and "equivalent annual damages" is used in the technical documentation. Expected annual damages is referred to as the outcome of the HEC-FDA computations where the annual maximum frequency curve is sampled while integrating the risk components and the uncertainty in each. The result is an expected annual value that represents a specific study condition and point in time. As expected annual values are computed for various points in time along the study horizon (2022 and 2072, for example), the expected annual value for any given year can change. The equivalent annual value is reserved for when that time varying value is brought to a single equivalent value over the planning horizon. This is useful for comparing alternatives given the dynamic conditions in the watershed.  Bulletin 17C is an update to Bulletin 17B and is the current practice to use in planning water and related land resources.	No.
83	Kathleen Schaefer	General Public	Page 1-17	DWR is to be commended for the communications and engagement process.	None.	Thank you. Comment noted.	No.
84	Kathleen Schaefer	General Public	Page 2-2	"the identified need has grown since 2017 to \$25 to \$30 billion..."	The Bay Area faces similar challenges with sea level rise. DWR might consider strengthening the statewide regional collaboratives to make a unified federal ask for multi-year funding.	This comment goes beyond the geographic scope of the CVFPP that is focused on the Central Valley.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
85	Kathleen Schaefer	General Public	Page 2-15	Small Community Actions - "Since 2017, 35 small communities received State funding for feasibility studies." There is no place to find all these studies. There are a number of studies that have been done as part of the ongoing effort. It would be nice to have a link to these studies.	Consider creating an appendix and/or a website where the different studies can be accessed or with information on where the study was done, who did the study and key actions.	Local agencies/grantees are generally considered the owners of SCFRR studies. Most grantees have uploaded study reports on their websites and/or reports may be available to the public by direct request to the agencies/DWR grant recipients. DWR does not maintain a website with these studies.	No.
86	Kathleen Schaefer	General Public	Table 2.3	Residual Risk Management. Insurance can play a key role in helping to manage the residual risk. Less than half the properties in the Central Valley that should have flood insurance actually do.	Consider increasing efforts to implement one or several insurance programs that help to close the insurance gap. This could include providing a parametric-micro insurance policy, providing a state-subsidized policy for less than \$500, and/or implementing community based insurance programs. This could work in tandem with the recommendation in Table 4.4	Added to Table 2.4 Areas of Continuing Conversation for Residual Risk Management, "Consider a pilot community-based flood insurance program to provide an affordable alternative to increasing costs of the NFIP. A community-based flood insurance program would be a mandatory program for all residents in a given area, and, similarly to health insurance, premiums can be lower than NFIP alternatives because of the number of individuals in the program." City of Isleton has also been added as an example of a community considering a community-based flood insurance program to Table 2.4.	Yes.
87	Kathleen Schaefer	General Public	Table 2.4	The NFIP regulations make certain agribusiness and agritourism activities difficult. The lack of meaningful change at the federal level continues to be a burden on agribusinesses. This challenge could be highlighted a little more clearly in the document.	In the absence of meaningful changes to the NFIP, DWR might consider supporting FEMA/DWR/local interest conversations around changing the FIRMs to a Zone D. In the past the high cost of Zone D premiums contributed to a reluctance to request the Zone D designation. With Risk Rating 2.0 that is no longer the case, adding to the justification of a dialogue to consider changes.	Added "Explore alternatives to the NFIP to support agribusiness and agritourism activities." to Table 3.3 in response to this comment.	Yes.
88	Kathleen Schaefer	General Public	Page 2-48	The lack of a governing body with the knowledge, expertise and capacity to apply for and manage grants is an identified problem for small communities.	Geologic Hazard Abatement Districts have the ability to overcome some of these challenges. DWR should consider supporting the formation of GHADs and/or standing up technical resource teams that could manage projects on behalf of the small communities. A GHAD might also a suitable entities to maintain multi-benefit projects. This is mentioned in actions, it might be helpful to highlight it a bit stronger.	DWR is learning about GHADs. Currently, the creation of a GHAD and a reserve fund are not eligible for funding under the FMPRA Grant Program guidelines. DWR continues to consider how a GHAD would work if future changes could support implementation of the CVFPP. Added "Further discussion is needed for how geologic hazard abatement districts and resiliency districts may provide models for developing governance options for small communities." to areas of continuing conversation.	Yes.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
89	Kathleen Schaefer	General Public	Page 2-52	Several of the indexes are based on census tracts. This misses some small communities like Isleton, that may be part of a wealthier census tract. For example Isleton, the poorest community in Sacramento County, did not qualify for the Proposition 68 funding for planning an monitoring.	Consider increasing the efforts to identify pockets of disadvantaged communities that may need additional resources.	DWR intends to scope efforts to better identify, understand, and support the most vulnerable communities for Update 2027.	No.
90	Kathleen Schaefer	General Public	Overall Document	At a recent Bay Planning Coalition presentation, the speakers made the case that instead of building more housing in the Bay Area, the housing shortage could be met by significantly increasing the number of new residential structures in the Central Valley.	As California struggles to meet the housing needs, the Central Valley is likely to face pressure to build more housing behind levees- increasing the residual risk. DWR should consider making presentations to other regional coalitions to highlight the potential for increasing residual risk and to strengthen alliances in support of Federal funding initiatives.	DWR will consider this comment when scoping outreach efforts following adoption of the Update. Wise use of floodplains is included in the Land Use and Floodplain Management policy issue.	No.
91	Kathleen Schaefer	General Public	Overall Document	Managed retreat is only mentioned in Table 2.2.	DWR should consider identifying areas where managed retreat might allow for more room for the river. DWR should support proposed legislation that would provide low interest loans to strategically purchase homes that are rented until such time as they are flooded.	Added "Perform analyses to identify areas where managed retreat is feasible and appropriate, and secure additional funding for programs such as Central Valley Tributaries." to Table 3.3 in response to comment.	Yes.
92	Kathleen Schaefer	General Public	Policy Rec. 5	The Independent Science Review Team recommended that Bulletin 17C no longer be used. As this is a foundational element of the CVHS, which is foundational to the CVFPP, following the recommendations of the Independent Science Review Team has the potential to significantly impact the overall decision making process.	DWR should elaborate more on whether or not they are going to make any of the changes recommended by the Review Team and consider adding a brief comment as to how making changes to the CVHS methodology might impact other actions.	Bulletin 17C is an update to Bulletin 17B and is the current practice to use in planning water and related land resources.	No.
93	Kathleen Schaefer	General Public	Overall Document	Overall the document is easy to read and presents a nice compendium of all the actions undertaken by DWR. The staff are to be commended for their hard work.	The final appendices are not yet available. As the technical activities have evolved over the past 10 years, DWR should consider editing the draft technical appendices so that they provide the detailed technical information in one place and clearly state all assumptions.	A revised Technical Summary Report will be released with the 2022 CVFPP Update. Detailed Technical Appendices are being revised in response to comments and will be available upon request.	No.
94	Kathleen Schaefer	General Public	Overall Document	Heat impacts are going to increase.	Consider strengthening the support for ways that flood mitigation measures might help to reduce heat impacts.	Added "Identify how flood risk reduction measures could reduce heat intensification resulting from climate change and increase access to rivers to reduce risks of climate change for most vulnerable communities." to Table 3.3 in response to comment.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
95	Erin Cali	General Public	Overall Document	It is not clear in the updated CVFPP that how floodplains/inundation patterns are changing under the effects of climate change impacts. The interactions and collaboration between FEMA floodplain engagement was not clearly planned and defined in the updates. There were also no systematic hydrology and hydraulics models that show-cased 100-yr and 200-yr (and above) floodplain delineations changes under the 2022 updates.	None.	DWR provides Levee Flood Protection Zone maps on our website. These maps estimate the maximum area that may be flooded if a State-Federal levee fails with flows at maximum capacity that may reasonably be conveyed. These maps specifically focus on flood risks associated with State-Federal levees. Lands within the Levee Flood Protection Zone may also be subject to flooding due to other factors including, but not limited to, levee failure at flows less than design capacity, overtopping of a levee, drainage problems, or other types of flooding from sources on the land side of the levee.	No.
96	Ric Reinhardt	CCVFCA	Page 2-11	The Yuba River Basin discussion highlights some of the improvements in the RD 784 basin but not all of them and does not mention the Marysville Ring Levee Project	Add a bullet that similar to the statement for the Sutter Basin. Something like: TRLIA working with local, State and federal agencies completed work for 200 year level of flood protection for the urban portion of the RD 784 levee system. Add another bullet stating: Improvements to the Marysville Ring Levee. Also, not clear what the "Star Bend Improvements" is in reference to. Is it the Star Bend setback levee? If so, that should be listed under the Sutter Basin.	Revised as requested.	Yes.
97	Ric Reinhardt	CCVFCA	Section 2.2.2	The River Islands Project is not mentioned in this section. This is an urban project.	Add a section describing the River Islands Project. Something like: The River Islands Project was constructed to provide 200 year protection to portions of the City of Lathrop. The project includes construction of setback and widened levees and was designed to meet state ULDC requirements.	Revised as requested.	Yes.
98	Ric Reinhardt	CCVFCA	Page R-10	The TRLIA Board will make their ULDC finding for the urban basin on June 14	Change the text to state that the TRLIA program of improvements to the RD 784 urban basin is complete.	Revised as requested.	Yes.
99	Ric Reinhardt	CCVFCA	Page R-11	The Goldfields, Crossing 21 and Site J improvements were completed in 2021	Update text to move this from "challenges" to "accomplishments".	Revised as requested.	Yes.
100	Ric Reinhardt	CCVFCA	Page R-11	Wheatland is missing from the priorities	Add text to include Implementing the small community feasibility study recommendations on Dry Creek in Wheatland.	Revised as requested.	Yes.
101	Ric Reinhardt	CCVFCA	Feather River Spotlight	The Hallwood Side Channel Project is not mentioned in the draft CVFPP.	Consider adding the following text: The Hallwood Side Channel and Floodplain Restoration Project is a multi-benefit project designed to restore and enhance ecosystem processes with a primary	Suggested text was too long to fit on the 2-page Regional Overview. Added "Implementing the Hallwood Side Channel and Floodplain Restoration Project." to the list of priorities for Feather River in	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					<p>objective of enhancing productive juvenile salmonid rearing habitat to increase the natural production of fall-run and spring-run Chinook salmon (<i>Oncorhynchus tshawytscha</i>) and Central Valley steelhead (<i>O. mykiss</i>) in the lower Yuba River. Planning, permitting, design, and monitoring were initially funded by Central Valley Project Improvement Act (CVPIA via the United States Bureau of Reclamation) grants through the United States Fish and Wildlife Service's Anadromous Fish Restoration Program (USFWS AFRP). Yuba Water Agency is providing funding as the Project's implementation lead with assistance from Proposition 68 and the Wildlife Conservation Board (Proposition 1). The Project is intended to directly address the AFRP doubling goal to increase production of natural anadromous salmonids in the Central Valley. The Project will be implemented over 5 years, divided into four areas/phases and will rehabilitate or enhance up to 157 acres of seasonally inundated riparian floodplain. Phase 1 was implemented in 2019-2020 and created/enhanced 89 acres of seasonally inundated floodplain, 1.7 miles of perennial channels, and 3.7 miles of seasonal channels. Phase 2 was completed in November 2021, in which 34 acres of seasonally inundated floodplain habitat and 1.6 miles of seasonal channels were created, and 24 large woody material structures were installed. Across Phases 1 and 2, approximately 44 acres of riparian vegetation were planted across the combined 123 acres. During Phases 3 and 4, an additional 34 acres of seasonally inundated floodplain habitat will be created. Phase 3 is being implemented in 2022, enhancing 13 areas of seasonally inundated floodplain and creating 0.7 miles of seasonally inundated channels. Phase 4 is funded and is planned to be completed in 2023, enhancing 21 acres of seasonally inundated floodplain and creating 0.9 miles of seasonally inundated channels. An additional 10 acres of riparian planting in Phases 3 and 4 is also planned for 2023. Large woody material will also be installed within the Phase 1, 3, and 4 footprints over the course of the 2022 and 2023 implementation years. Once completed (i.e.,</p>	<p>response to the comment that the project was missing from the section. Project has been added to the 2022 Conservation Strategy Update as well.</p>	

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					Phases 1-4), the Project will result in up to 3-feet of water surface elevation reduction for the 100-year design flow. This water surface elevation reduction is a result of removing 3,200,000 CY of sediment from the floodway, most of which comes from large linear tailings piles that separate the main channel from its floodplain. This should also be added to page 2-8		
102	Ric Reinhardt	CCVFCA	Figure 4.4	The pie chart lumps in construction underway with future need.	Consider adding a new category that breaks out costs for projects under construction. This will be demonstrate progress and remaining need.	Not all projects are associated with construction costs; projects are classified as in-progress or not started yet. Because individual project progress is not tracked, projects that are in-progress or not started yet are grouped together to estimate future need over the 30-year planning horizon. However, any provided encumbered, allocated, and/or spent-to-date costs are excluded from the future need estimate.	No.
103	Ric Reinhardt	CCVFCA	Overall Document	The draft report identifies the pace of implementation for multi benefit projects as a challenge. One of the impediments is navigating DWR FMO and the CVFPB permit conditions. FMO is put in a tough spot as they do not normally receive additional funding to address habitat project maintenance needs and they typically have compensatory mitigation requirements for maintenance that impacts habitat. Project proponents may secure funding for construction from a grant, but also may not have a revenue stream for O&M. The Board typically includes a special condition to permits that requires the applicant to be responsible for O&M even if none is believed to be required. These two issues effect decision making on whether to pursue projects.	This is something that should be identified as a challenge to implementation of habitat and multi benefit projects and consider exploring this further in the 2027 update.	Added "Developing strategies and best practices for the long-term O&M of multi-benefits projects." to Table 3.3 recommendations in response to this comment.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
104	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 1-8 through 1-10	It is important to point out that climate change is a two-sided coin, where one area gets wet and wetter and another area gets dry and drier. How one addresses climate resilience in one extreme could also impact conditions in the other extreme. The two climate extremes are interrelated as in an integrated system. A holistic approach must be adopted in finding solutions to climate change problems because climate change affects both ends of the extremes. However, some of the synergy or nexus between the management of these two extremes may not be so well understood which need further exploration, research, and development. In other words, when one starts thinking about actions for flood risk reduction due to climate change, one must also think about how these actions could affect drought resilience/preparedness and vice versa perhaps. For example, reducing drought induced wildfires may also reduce subsequent flooding.	We need to go beyond the conceptual by developing a holistic framework to consider these connections as part of a decision support tool for project design and analysis. The development of such as analysis framework should be included in the high-priority policy issue recommendation in Table 3.3 of Section 3.3.5	Update 2022 recognizes that the Central Valley is increasingly vulnerable to dramatic swings between drought and flood due to climate change. Coordinated management of floodwaters with water supply can support drought preparedness, sustainable groundwater management, and watershed resilience. For example, the technical analysis in Appendix D, Reservoir Vulnerability, evaluates the effect of lower storage conditions (potentially driven by drought) on flood flows. Also, watershed studies are being performed to understand the effect of recurring drought and flood conditions and evaluate multi-sector adaptation strategies such as Flood-MAR. These studies are in early stages and will inform Update 2027.	No.
105	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 1-11 and 1-12	An integrated approach to track flood action performance should include additional conceptual monitoring categories such as agricultural sustainability, drought resilience/preparedness, and others that may directly or indirectly impacted by implementation of the CVFPP.	Consider including additional SSIA outcomes categories in Sections 2.10 and 3.4.	The California Water Plan Update 2018 includes a performance tracking framework that includes a larger set of metrics. CWP Update 2023 is further developing a Watershed Resilience Framework that would include this broader set of metrics for performance tracking. The CVFPP will align with this initiative leading to Update 2027. The CVFPP tracks performance against plan goals and the plan does not currently have agriculture sustainability or drought-related goals. DWR recommends continued development and tracking these metrics through the Water Plan's Watershed Resilience Framework. This work is ongoing and will inform CVFPP Update 2027.	No.
106	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 2-4	What does it mean specifically by agricultural sustainability and its relations to flood risk management? Does it mean to continue and preserve agriculture as usual along side flood control infrastructures and management or modified agriculture such as types of crops or something like wildlife-friendly agriculture.	It is recommended to define the term agricultural sustainability and provide a good example in a Project Spotlight?	Agricultural sustainability is included in the useful terms section added to the document. Agricultural sustainability is a part of the vision of the Yolo Bypass-Cache Slough Partnership and a stated priority of several RFMP regions.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
107	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 2-28 and 2-29	This specific example is a good start for a climate change study focusing on a specific watershed (Merced River). Climate change analysis and impact evaluation would be much more meaningful to local communities when it is based on a granular scale if possible such as in this example rather than on a regional scale.	It is recommended that watershed scale climate change research and study should continue for all pertinent watersheds in the Central Valley.	DWR is currently performing five watershed studies in the San Joaquin River similar to the Merced Study using best available science highlighted in the latest 6th Assessment Report from the Intergovernmental Panel on Climate Change under the report: Climate Change 2022 - Impacts, Adaptation and Vulnerability Chapter 7, section 17.3 Decision-making Processes of Risk Management and Adaptation. These studies are scheduled to be completed in 2024. Recommendation 5 in Table 3.3 also includes "watershed-based climate change vulnerability and adaptation assessments building to a system scale for the Sacramento River and San Joaquin River basins to understand the anticipated changes in the flood system and investment needs."	Yes.
108	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 2-37	We appreciate the addition of this new section and other groundwater related project and policy spotlights (Sections 2.2.3 & 2.9.3) and revisions in other parts of the draft in response to our previous comments on the Working Draft. To move these floodplain management state initiatives forward as described, there must be an institutional framework where groundwater and flood managers come together in partnership as one decision making body to develop projects that would be mutually beneficial. This type of governance or institutional framework has to be in place not just for the management of groundwater and flood, but also for other beneficial users of this water such as ecosystem services, agricultural sustainability, and other social economic values that are important to the region. This should be a priority goal/action for the coming years.	Specifically define and include the development of such a high-level decision making institutional framework or governance structure in the high-priority policy issue recommendation in Table 3.3 of Section 3.3.5. Potentially, this institutional framework could also be part of an action item in Table 3.3 No. 01	DWR agrees with this comment that a forum for flood managers, groundwater managers, and other partners to collaborate on mutually beneficial projects is needed. Concepts for these collaboratives are being explored by the Sustainable Groundwater Management, Flood-MAR and CA Water Plan programs and recommendations will be forthcoming through these programs. For example, the CA Water Plan Update 2023 will include a framework for a Watershed Resilience Initiative that includes the formation of Watershed Resilience Networks. While these efforts are ongoing, recommendations are not ready for the 2022 CVFPP Update, but are expected to inform the 2027 CVFPP Update.	No.
109	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Table 2.4	Are there current existing examples of agricultural sustainability projects that can be illustrated under "Highlighted Accomplishments"?	See "Issue" comments	The CVFPP does not have explicit examples of "agricultural sustainability projects," but rather flood risk reduction actions that may support agricultural sustainability as a desired outcome in the project area. These actions may include agricultural easements and many rural and small communities flood risk reduction projects that protect areas that depend on agriculture for their livelihood. The Yolo Bypass-Cache Slough Partnership is explicitly formulating actions to	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
						sustain agriculture for multiple benefits in and around the Bypass.	
110	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 2-59	It is also equally important to point out the concerns, limitations, and challenges to Flood-MAR implementation so that the readers would not be misled and misinformed. A potential list of challenges and concerns may include: water rights, permitting issues, biological concerns, siting appropriate locations, groundwater quality concerns, lack of conveyance infrastructures, landowner resistance, and etc.	Provide concerns, limitations, and challenges regarding Flood-MAR implementation in the Project Spotlight in addition to all the benefits already listed, which are great.	Revised as requested.	Yes.
111	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 3-11	We support that multi-benefit projects, as feasible. However, "multi-benefit" should include flexible allowances with allowable land uses whereas such benefits may also be indirectly related but ultimately benefit the project objectives.	All potential benefits including indirect benefits should be considered for flood related projects.	Multi-benefit projects have been defined in the CVFPP and other potential benefits are highlighted throughout. Indirect benefits may be accounted for.	No.
112	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 3-11	We agree and support the integration of flood risk management with ecosystem services, agriculture, recreation. May want to consider replacing "Achieving a sustainable balance among flood risk management, ecosystem vitality, agriculture, recreation, and other benefits important to the regions." with "Achieving a sustainable integration among flood risk management, ecosystem vitality, agriculture, recreation, and other benefits important to the regions"	See "Issue" comments	Clarified text similar to requested change.	Yes.
113	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 3-18	Would be helpful to describe what is wildlife-friendly agriculture and the goals that it tries to achieve.	Describe in summary what is wildlife-friendly agriculture	A definition of wildlife-friendly agriculture has been added to the useful terms section. A new section was added to the CS on wildlife-friendly agriculture.	Yes.
114	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Policy Rec. 1	The draft recommendation to "Establish basin-specific task forces of high-level decision-makers and staff from State, federal, and local agencies, Tribes, and other partners ..." is quite general. It would be helpful to clarify the specific agency departments, divisions, and groups targeted for each of the government levels indicated for such task forces. Provide a current existing similar task force as an example.	See "Issue" comments	List of potential participants in basin-specific task forces was not added to the document, as participants would be basin and topic-specific (such as the Ag Ordinance Task Force). Task forces should include organizations that have a role in or responsibility for planning, selecting, designing, funding, implementing, or maintaining flood risk reduction projects.	No.
115	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Policy Rec. 3	The draft recommendation to advocate new tools for floodplain management is a sensible one. It would also be helpful to continue to update and improve upon floodplain best management practices and guidance documents to keep up with the science and latest understanding.	See "Issue" comments	Revised as requested. Added "Update and improve floodplain management best practices and guidance documents as best available science, tools, and data advance."	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
116	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Policy Rec. 7	Replace "Promote agricultural land stewardship..." with "Advance agricultural land stewardship..." or a word that would be stronger than "promote"	Use a word that would be stronger than "promote"	The CVFPP is not a project decision document, so use of "promote" is appropriate. Any stronger language would be beyond the scope of what the CVFPP can do.	No.
117	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Policy Rec. 12	Replace "...to promote sustainable floodplain land uses that..." with "...to advance sustainable floodplain land uses that..."	Use a word that would be stronger than "promote"	Revised as requested.	Yes.
118	Dick Tzou, Misty Kaltreider, James Bezek	Solano County Department of Resource Management	Page 3-54	Construction of set back levee projects or other modified land uses due to flood mitigation construction may also induce loss of farm lands or conversion of different type of crop that may increase or decrease agricultural productivity and revenues.	Both pros and cons of flood project construction should be included and considered in its economic analysis	The IMPLAN construction economic impact analysis is not meant to be "pro" or "con." It estimates the sum of primary and secondary economic effects in an economy resulting from project construction, although these are often considered as a "pro." If by "con" issues you are referring to the effects on agriculture (for example) by a levee setback, these will be evaluated for each project's feasibility study similar to what was done for the Lower Elkhorn Basin Levee Setback project. Feasibility-level analyses are anticipated to be done for more specific geographic areas prior to implementation of future projects, including some that may evaluate levee setbacks.	No.
119	Nedzlene Ferrario	Solano County on behalf of Solano Airport Land Use Commission (ALUC)	Page 3-38	Solano County ALUC recognizes the importance of multi benefit projects which promote ecosystem restoration and reduce flood risks. However, CVFPPan promotes multi benefit projects in proximity to public airports and Solano ALUC is concerned that multi benefit projects have the potential to create habitats that increase wildlife aircraft strikes and risks to aircraft safety; and inconsistent with Delta Plan MMRP measure no. 14-4 which require avoiding creating hazardous wildlife attractants within 10,000 ft of an Airport Operations Area and maintain distance of 5 statute miles between the farthest edge of the Airport Operations Area and hazardous wildlife attractants. Various projects within Solano County are planned and approved within the FAA restricted areas.	Solano County ALUC supports multi benefit projects which collaborate with public and military airports, and local entities in siting, funding and design of projects that incorporate measures to minimize risks to aircraft safety, mitigate risks when located between 2-5 miles of an airport and are not located within 10, 000 feet of an airport.	All projects will be subject to public review and comment under CEQA and will be formulated, designed, and implemented in accordance with all applicable State and local ordinances and regulations, including, but not limited to, the DSC's Delta Plan when projects are located in the Sacramento-Joaquin Delta such as projects near the airport in Solano County.	No.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
120	Yolo County	Yolo County	Chapter 1	<p>WD Comment: The first paragraph in the forward does not mention agricultural sustainability, although the second paragraph does. As agricultural sustainability is a vital element of maintaining vegetation in flood bypasses and other floodplains, as well as an important part of the California economy and the world food supply, the first paragraph should include improving agricultural sustainability.</p> <p>PD Follow-up Comment: Chapter 1: Updating the CVFPP on page 1-1 has new language as follows, "This part of California helps feed the world. The Central Valley is on of the world's most productive agricultural regions, supporting a \$17 billion agricultural economy that is unmatched in its diversity of commodities." This is a stand alone paragraph, the third paragraph from the top. The introduction is generally expanded and improved.</p>	<p>WD Comment: Edit the first paragraph of the forward to include agricultural sustainability, as follows: "The Central Valley Flood Protection Plan (CVFPP) describes a programmatic vision for improving flood risk management throughout the Central Valley. The CVFPP was adopted in 2012 and is updated every five years. The plan lays out strategies to improve flood risk management in a manner that supports implementation of structural and nonstructural actions, reduces system maintenance and repair needs, promotes ecosystem functions and multiple benefit projects, improves agricultural sustainability, and provides the institutional support needed, as well as strategies that inform, prioritize, and track the State's investment in flood management over the next three decades. The CVFPP and subsequent updates must fulfill the requirements of the Central Valley Flood Protection Act of 2008, which states the plan shall include a description of both structural and nonstructural means for improving the performance and elimination of deficiencies of levees, weirs, bypasses, and facilities, including facilities of the State Plan of Flood Control and meet multiple objectives. Multiple objectives include ecosystem health, linking flood management and the water supply system, agricultural land stewardship and sustainability, and identifying opportunities for groundwater recharge, among others defined in the Act."</p> <p>PD Follow-up Comment: Yolo County staff recommend adding information about the benefits of wildlife-friendly agriculture and the benefits of vegetation management to the flood control system.</p>	<p>The sentence in the first paragraph as written reflects the goals of the CVFPP as adopted by the Central Valley Flood Protection Board. Agricultural sustainability is not an adopted CVFPP goal, but content has been added throughout the document on the importance of agricultural sustainability in the Central Valley. Content on wildlife-friendly agriculture has been added to the CS and CVFPP Useful Terms.</p>	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
121	Yolo County	Yolo County	Page 1-2	<p>WD Comment: The State Systemwide Investment Approach is introduced but the purpose is not clear to the layperson, or the different from the CVFPP, other than it is introduced as a "road map." Since it guides investment, Yolo County's comments on this CVFPP Update should be included in the SSIA as well.</p> <p>PD Follow-up Comment: Chapter 1 : Updating the CVFPP on page 1-2 has been updated to more clearly delineate between the CVFPP and the SSIA. The CVFPP is the "strategic blueprint for Central Valley flood risk management" and the SSIA is the guides how the state will invest in flood management in the Central Valley; it is an assembly of the most promising, cost-efficient, and implementable elements studied in the 2012 CVFPP.</p>	<p>WD Comment: Add a couple of sentences of additional detail about the SSIA and the difference from the CVFPP Update. If the SSIA should also include agricultural sustainability actions consistent with these comments, Yolo County would like to recommend the SSIA also be updated to include ag sustainability actions.</p> <p>PD Follow-up Comment: No further comment needed.</p>	The foundational description of the SSIA with respect to the 2022 Update has been clarified within Chapter 1. More specific discussions around how to address agricultural sustainability as part of multi-benefit project implementation are occurring through the Yolo Bypass-Cache Slough Partnership, as described in Chapters 2 and 3.	No.
122	Yolo County	Yolo County	Page 1-3	<p>WD Comment: Thank you for including information about the potential impacts to food supplies resulting from severe flooding of agricultural land as follows, "Regional agriculture-based economics could be devastated, causing serious impacts to the State and disrupting national and international food supplies. (Quantitative data will be added to the Public Draft when available from Regional Economic Analysis):" We have suggestions for additional discussion and data that DWR should consider integrating into the quantitative data analysis to further support this statement.</p> <p>PD Follow-up Comment: The April 2022 Draft adds a new section called "1.1 Context for the CVFPP Update" on page 1-3 which appears to use the language starting on page 1-1 of the November 2021 draft. This language has been updated on page 1-4 as follows "A major flood event would have significant impacts on not only Central Valley residents, but all Californians and people nationwide. Agriculture-based communities could be significantly impacted and flood events during the growing season could disrupt national and international food supplies. This underscores the importance of understanding and focusing on the disproportionate impacts of flood risk to socially vulnerable communities."</p>	<p>WD Comment: The CVFPP Update should include some additional information about the importance of California to the national food supply, including the state's role as the only state with a Mediterranean climate producing over 300 crops and the number of acres of prime farmland. In addition, this section should include data generated by Yolo County on the potential impacts of proposed habitat projects in the floodplain on agriculture. Yolo County encompasses many parts of the Mid and Upper Sacramento River (MUSR) and Lower Sacramento River/Delta North (LSDN) Regional Planning areas. In recent years, Yolo County has completed an analysis of agricultural economic impacts associated with land use changes in the flood system that would inform the State's Regional Economic Analysis which should be integrated into that analysis. Yolo County also worked with UC Davis to complete a tipping point analysis for the Yolo Bypass, which demonstrates the point at which flooding could influence farmers to no longer farm in the Bypass and the resulting impacts on other industries. Yolo County also suggests that rural levee improvements and Flood-MAR/groundwater management efforts be factored into this the State's Analysis. Link to Yolo Bypass Agricultural Impact Analysis: <a href="https://www.yolocounty.org/home/showpublisheddocument/22478/635289380535200000">https://www.yolocounty.org/home/showpublisheddocument/22478/635289380535200000</a>.</p>	The CVFPP recognizes the importance of agriculture in the Central Valley. Agricultural sustainability is described in the plan as related to multiple desired flood-related outcomes, including public safety (through wise use of floodplains) and healthy economy. The foundational description of the SSIA with respect to the 2022 Update has been clarified within Chapter 1. More specific discussions around how to address agricultural sustainability as part of multi-benefit project implementation are occurring through the Yolo Bypass-Cache Slough Partnership, as described in Chapters 2 and 3.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
					<p>PD Follow-up Comment: While other items mentioned in this "Context" section have language related to what the state should do about the impact, the section on agriculture does not. The CVFPP Update should include what the state plans to do to help advance the agricultural economy. Yolo County suggests including the establishment of the Agricultural Advancement Fund or something similar to demonstrate what the state should do about the potential impact. An example of the information provided for other elements is as follows "The projected impacts of climate change on ecological processes, habitats, and species, necessitates a focus on building ecosystem resiliency and restoring ecological and geomorphic processes. This effort will require increasing the pace of multi-benefit project implementation, and an emphasis on nature-based solutions..." There is no such action-oriented language for the agriculture section of the "Context" paragraph.</p>		
123	Yolo County	Yolo County	Table 1.1	<p>WD Comment: Agricultural Sustainability is not listed as a policy issue. Ag sustainability should be added as a policy issue because of the complex nature of both protecting agricultural land important to the flood system and ensuring growers can continue to profit from farming given changing conditions and state priorities. Ensuring ag sustainability will help with some of the other policy issues listed, such as land use (farmers are less likely to sell their land to developers if they are making money farming) and development of multi-benefit projects (wildlife-friendly agriculture is the central conservation focus of the Yolo Habitat Conservation Plan/Natural Community Conservation Plan). In Chapter 2, the Update reports on progress related to policy issues, so the addition of agricultural sustainability as a policy issue will also ensure the state is held accountable for helping to address this policy issue.</p> <p>PD Follow-up Comment: While the April 2022 CVFPP Draft adds two new policy issues "Climate Change and Flood System Resilience" and "Equity", the April 2022 draft does not include "Agricultural Sustainability" as a policy issue. The list of policy issues has moved from Chapter 1</p>	<p>WD Comment: Add agricultural sustainability as a policy issue and describe the issues.</p> <p>PD Follow-up Comment: Yolo County recommends reconsideration of this request.</p>	<p>The 2022 CVFPP Update includes agricultural sustainability in Table 3.3 High Priority Policy Issue Recommendations for CVFPP and Agency Leads under recommendation number 7.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
124	Yolo County	Yolo County	Page 2-10	<p>WD Comment: The "Spotlight on Yolo Bypass Cache Slough Partnership" should perhaps focus less on highlighting it as an example of a robust state/federal/local partnership and more as an example of the challenges of establishing and organizing such a partnership. Even though it has been seven years since its inception, the Partnership has not met regularly, the working groups are still in the process of developing tangible work products, there is not a dedicated staff person at DWR to ensure forward movement of the process, and it's unclear whether there are outcomes to which the Partnership can point as successes.</p> <p>PD Follow-up Comment: The April 2022 Draft has the spotlight on page 2-14 now. The updated draft has new language as follows "Still, additional work remains to develop this program with clear agency roles and responsibilities, establish sufficient funding and dedicated resources from all partners, and collectively improve alignment of priorities and implementation of future projects." The updated draft has also toned down the language regarding accomplishments, instead citing specific examples of the work they have accomplished, such as establishing workgroups, including the Agricultural Sustainability Workgroup.</p>	<p>WD Comment: Edit this spotlight to focus on the importance of such partnerships but the challenges and lessons learned from the last 7 years in managing the partnership, as well as recommendations for moving forward. Recommendations for moving forward include applying the performance measurement framework listed in the CVFPP to the Partnership, as well as investing in staff resources to ensure regular meetings, follow up on action items, and make progress towards goals and measurable objectives.</p> <p>PD Follow-up Comment: No further comment needed, although Yolo County notes that establishing workgroups is not an accomplishment if the workgroup has not produced work products agreed to by local and state agencies. To our knowledge, the Ag Sustainability Workgroup is still working on completing deliverables and the Yolo Bypass-Cache Slough Partnership Steering Committee has not yet approved any work products from this group.</p>	Comment from the Working Draft was responded to in the Public Draft.	No.
125	Yolo County	Yolo County	Page 2-13 and 2-14	<p>WD Comment: The following statement on page 2-13 to 2-14 regarding agricultural easements is unclear: "Further, management actions that limit exposure and reduce vulnerability represent the most reliable ways to enhance resilience. These actions – such as communicate risk widely through flood risk awareness campaigns or promoting the wise use of floodplains via agricultural easements typically do not preclude other actions from being implemented later - thereby preserving the system's adaptive capacity. Such actions contribute to flood system sustainability and flexibility to accommodate future uncertainty."</p> <p>PD Follow-up Comment: Rather than adding a new section on agricultural sustainability as suggested by the County, this language appears to have been deleted. The term "agricultural easement" appears only once in the Update and the term agricultural conservation easement" also only appears once. There are at least 20 mentions of acquiring easements to allow flood flows, but no specific discussion of agricultural easements. On page C4-2 in the Appendix, in a table called "Supplemental CVFPP Recommendations," the plan states "Utilize landowner incentive programs and</p>	<p>WD Comment: Yolo County requests additional clarity here. What does "wise use of floodplains via agricultural easements" mean? What is the definition of "wise"? Does it include a focus on agricultural sustainability and ensuring agriculture on these lands is economically viable when the easement is placed on the property? What does "these easements do not preclude other actions from being implemented later" mean? Typically easements are in perpetuity, so are these short-term easements that will allow other actions in the future or are you referring to the State's ability to exercise eminent domain to extinguish an easement? Is this part of a State strategy to preserve its ability to widen bypasses or have a setback levee where agriculture is the current land use? We suggest the inclusion of a section in this chapter on the importance of agricultural sustainability, including the use of agricultural easements as a tool, and the role of agricultural sustainability in improving the flood management system, especially bypasses. The addition of this</p>	The Section was substantially rewritten between the Working and Public Draft to focus on State and Federal agency accomplishments since the 2017 CVFPP Update and this commented on text is no longer in the document. Efforts by the State floodplain manager to promote agricultural easements is noted in Table 2.4. Easements are also noted as potential rural and small community actions in Chapter 3. The importance of agricultural sustainability was woven throughout the document in the Public Draft. The authors chose to weave agricultural sustainability throughout the document instead of adding a dedicated section for document flow and consistency with other potential action outcomes.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>agricultural easements for flood conveyance with conditions for continued agricultural production."</p>	<p>section will solidify the state's focus on ensuring agriculture in the floodplain remains viable both because agriculture helps to maintain vegetation in floodplains and because of the importance of maintaining the food supply mentioned in Chapter 1. This type of clarification will help the reader understand the scope of the state's interested not just agricultural easements, but agricultural sustainability generally.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend creation of a new section on the importance of agricultural sustainability in the floodplain, including vegetation maintenance.</p>		
126	Yolo County	Yolo County	Table 2.4	<p>WD Comment: As mentioned in the comment on Chapter 1, agricultural sustainability is not listed as a policy issue and therefore the discussion of agricultural easements is lumped in with the discussion of land use and floodplain management. Agricultural sustainability in the flood system should be a separate policy issue and progress should be reported separately than these other issues. Since it is not currently a policy issue, statements like the one "promoted agricultural conservation easements" are unclear in terms of what was accomplished.</p> <p>PD Follow-up Comment: The updated April 2022 Draft does not address this comment. Agricultural sustainability was not added as a policy issue. On page 2-43, the updated "Land Use and Floodplain Management" policy issue has revised language to say, "The State floodplain manager worked with partners to promote agricultural conservation easements and to implement early environmental conservation projects." The language used to say "Promoted agricultural conservation easements and worked with partners to implement early conservation projects." The updated draft does not clarify what promoting agricultural easements means as an accomplishment.</p>	<p>WD Comment: Suggest adding agricultural sustainability as a policy issue, which will allow the CVFPB to clearly articulate the progress made towards agricultural sustainability since the 2017 update, as well as the use of agricultural conservation easements. In addition, the sentence here "promoted agricultural conservation easements and work with partners to implement environmental conservation projects" is actually two separate actions and should be separate into "Promoted agricultural conservation easements" with an explanation of what this means and "Worked with partners to implement environmental conservation projects." With a new agricultural sustainability policy issue, the agricultural conservation easement bullet can be moved to that policy issue section, along with the explanation of what "promoted" means.</p> <p>PD Follow-up Comment: Yolo County staff continue to recommend this change and more information about the accomplishments related to agriculture.</p>	<p>The CVFPP considers agricultural sustainability to be most closely related to the Land Use and Floodplain Management policy issue. More conversations would be needed prior to elevating agricultural sustainability to its own policy issue. This will need to be discussed with all the RFMPs and other key partners to better understand the issue framing across the Central Valley. These discussions will inform the decision to add a new policy issue for Update 2027.</p>	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
127	Yolo County	Yolo County	Land Use and Floodplain Management Policy Issue	<p>WD Comment: The sentence "a variety of interest and priorities exist related to achieving ecosystem benefits while preserving agriculture and associated rural economies" is unclear and minimizes the complexity and importance of preserving agriculture as part of improving the flood system. More information should be provided and the language should be clarified and strengthened.</p> <p>PD Follow-up Comment: An agricultural sustainability policy area was not added in the April 2022 draft. In addition, the unclear language related to the sentence highlighted in Yolo County's comment remains unchanged and is still unclear.</p>	<p>WD Comment: As suggested in the previous comment, a new agricultural sustainability policy issue should be added. The sentence "a variety of interests and priorities exist related to achieving ecosystem benefits while preserving agriculture and associated rural economies" should be included in this new policy issue and clarified, or replaced with more specific statements that articulate the state's intent when it comes to preservation of agriculture. Since most of the rural lands surrounding the State Plan of Flood Control are agriculture, it is critical to clarify the state's intent with regard to preserving agriculture as part of flood system improvements. Vague statements like this one should be avoided. As stated earlier in these comments, Yolo County partnered with University of California, Davis agricultural economists to demonstrate proposed habitat projects in the Yolo Bypass, if not appropriately designed, will have significant economic impacts on agriculture and conversion of land from agriculture to habitat could affect other related industries, such as processing facilities. Yolo County and its RFMP partners recognize the necessity to balance decreased flood risk in the system with the long-term viability of agriculture, but this principle is not reflected in the CVFPP Update despite longstanding efforts to promote its importance. Construction of setback levees or the expansion of bypasses will increase the frequency of inundation on agricultural lands and likely reduce agricultural yields or require crop changes, so measures to minimize these impacts or implement other measures to ensure regional agricultural sustainability is imperative.</p> <p>PD Follow-up Comment: Yolo County staff continue to recommend this change and more clarification about this comment.</p>	<p>Prior to the Public Draft, this sentence was changed to clarify meaning and respond to comment on the Working Draft. The sentence reads "Continued conversations are needed to identify strategies that balance decreased flood risk and enhanced ecosystems in the system with the long-term viability of agriculture in the Central Valley." See response to comment 126 in regard to the addition of an agricultural sustainability policy issue.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
128	Yolo County	Yolo County	Land Use and Floodplain Management Policy Issue	<p>WD Comment: No mention of Lower Sacramento River/Delta North Regional Flood Management Plan's Resources and Agricultural Sustainability Plan in the CVFPP Update</p> <p>PD Follow-up Comment: Page R-8 of the April 2022 Draft includes an overview of the Lower Sacramento River-Delta North Region, but does not mention the Agricultural Sustainability Plan described in the 2014 LSDN RFMP. In fact, the overview does not even list "agricultural sustainability in the floodplain" as one of the challenges or mention "agricultural sustainability" as a priority.</p>	<p>WD Comment: The CVFPP Update should describe the Resources and Agricultural Sustainability Plan developed by the LSDN RFMP and commit to implement these measures as part of flood system improvements, as well as report on progress in every update. The LSDN RFMP partners, including Yolo County, have worked hard closely to integrate the CVFPP's ecological goals into the proposed flood risk reduction projects, while at the same time identifying strategies for ensuring the existing agricultural operations within the region are sustainably maintained and protected. These efforts culminated in the development of the Resources and Agricultural Sustainability Plan (RASP) described in the 2014 LSDN RFMP. Yet this plan is not mentioned in the CVFPP 2022 Update, nor are any of the recommended measures included. The RASP has been developed to ensure the inherent benefits provided by agricultural land uses in achieving flood risk reduction and providing wildlife-friendly land areas are appropriately integrated into the flood planning and regional conservation efforts. Agriculture has long been recognized as an appropriate use within floodplains because it affords an economically viable way of maintaining the landscape consistent with the operations of flood risk management infrastructure. A healthy agricultural economy also provides a viable use for lands that otherwise could be converted to urban uses; therefore, limiting the expansion of residential land practices within flood-prone areas.</p> <p>PD Follow-up Comment: Yolo County staff continue to recommend additional language re agricultural sustainability in the RFMP overview section, including ensuring agricultural sustainability actions, including implementation of the RASP and support for furthering the Ag Advancement Fund proposal under development by Yolo County and Solano County staff.</p>	<p>The CVFPP Update 2022 does not mention the 2014 LSDN Agricultural Sustainability Plan as an accomplishment because the plan focuses on accomplishments since the last update (2016 and after). Agricultural sustainability has been added to the LSDN regional overview as requested. The CVFPP will work with the LSDN and other RFMPs on agricultural sustainability recommendations and actions leading to Update 2027.</p>	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
129	Yolo County	Yolo County	Chapter 2	<p>WD Comment: No examples are included on successful ways to sustain agriculture and improve the flood system.</p> <p>PD Follow-up Comment: While the April 2022 draft does not include a "Spotlight on Yolo Bypass Wildlife Area" to demonstrate a state success story of simultaneously sustaining agriculture, creating habitat, and improving the flood system, the draft does contain this language on page 3-28 under 3.3.3 Rural Management Actions: "Further, rural habitat restoration can restore and reconnect historic floodplains, improve water quality, and provide habitat for salmonids, migratory birds, and waterfowl and maintain agricultural production, such as in the Yolo Bypass Wildlife Area and in Flood-MAR project concepts." The Yolo Bypass Wildlife Area was not mentioned at all in the November 2021 draft.</p>	<p>WD Comment: The CVFPP Update should contain a "Spotlight on the Yolo Bypass Wildlife Area" to demonstrate a state success story of simultaneously sustaining agriculture, creating habitat, and improving the flood system. The 57,000-acre Yolo Bypass is a critical element of the state flood control system, provides a productive agricultural landscape, and is important habitat for listed fish and terrestrial species. Agriculture within the Yolo Bypass maintains the floodplain's flood conveyance capacity by managing emergent vegetation. The dense riparian canopy that would emerge if the farmers did not manage the land would substantially increase the flood plain's roughness and reduce its capacity to pass peak flood flows. Farmers have on-the-ground land management knowledge necessary to maintain vegetation consistent with flood system requirements and are the key resource stewards. The 16,000-acre, state-managed Yolo Bypass Wildlife Area is within the the Yolo Bypass and is an example of this work in practice. The state leases land to farmers at a discounted rate relative to the market for five years at a time (a relatively long contract), providing additional revenue to help farmers with wildlife-friendly agriculture techniques and increasing stability. In return, the agricultural lease revenue directly supports ecological restoration and habitat management within the Wildlife Area. In addition, the state funded over \$5 million in drainage and water infrastructure improvements to help improve management of both wetlands and wildlife-friendly agriculture in the Wildlife Area in response to a request by Yolo County. This Wildlife Area also allows for the extensive environmental education efforts of the Yolo Basin Foundation, an organization with over 24 years of experience working collaboratively with the state and local farmers. The Yolo Bypass Wildlife Area is therefore an excellent example of a multi-benefit project that</p> <p>PD Follow-up Comment: Yolo County staff continue to recommend a "Spotlight on the Yolo Bypass Wildlife Area."</p>	Revised as requested.	Yes.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
130	Yolo County	Yolo County	Page 2-31	<p>WD Comment: While it's helpful that the "Flood and Ecosystem Performance Accounting (formerly Hydraulic and Ecosystem Baseline and Program Phasing)" policy issue contains the language, "Measurable objectives should recognize the ecological value of wildlife-friendly agriculture," this bullet should also recognize the need to track the cost to growers of implementing wildlife-friendly farming techniques as part of the agricultural sustainability effort.</p> <p>PD Follow-up Comment: The updated April 2022 draft has this same section on page 2-45. Under "Area for Continuing Conversation" the new language is as follows, "Continued conversations are needed between State, federal, and local partners about how to recognize potential value and costs of innovative physical and operational improvements on agricultural land that may enhance ecological values for fish and wildlife."</p>	<p>WD Comment: Amend the bullet under "Areas for Continuing Conversation" under "Flood and Ecosystem Performance Accounting" to "Measurable objectives should recognize the ecological value and cost to growers of wildlife-friendly farming techniques."</p> <p>PD Follow-up Comment: Yolo County staff appreciate this change, as it addresses Yolo County's concern.</p>	<p>Comment addressed in WD as requested. No new comment for the PD.</p>	<p>No.</p>
131	Yolo County	Yolo County	Page 2-33	<p>WD Comment: Multi-benefit Projects - Stakeholders expressed concern that an emphasis on multi-benefit projects could carry unintended consequences such as increased costs to local flood agencies and landowners and conversion of productive agricultural land to floodplain habitat. - How environmental justice, equity, and agricultural sustainability can be included as goals for MB projects is appoint of discussion among DWR, partners and stakeholders</p> <p>PD Follow-up Comment: The updated April 2022 draft continues to contain this language in the same section, but now on page 2-47.</p>	<p>WD Comment: Agreed</p> <p>PD Follow-up Comment: No additional comment needed.</p>	<p>Comment addressed in WD as requested. No new comment for the PD.</p>	<p>No.</p>
132	Yolo County	Yolo County	Governance and Institutional Support Policy Issue	<p>WD Comment: Yolo County agrees with the statement under "Areas for Continuing Conversation" in the Governance and Institutional Support section that "many local and regional agencies are not structured or resourced to implement or maintain multi-benefit flood improvements." This should be amended, however, to provide resources directly to reclamation districts so they can hire staff (not just consultants) to help support their efforts to manage and develop projects.</p> <p>PD Follow-up Comment: The updated April 2022 draft contains new language to address this issue under "Areas of Continuing Conversation" as follows: "Entities with proper authorities to lead and mechanisms to fund the planning, design, and construction of multi-year capital improvement type projects in rural areas are needed."</p>	<p>WD Comment: Amend the bullet under "Areas for Continuing Conversation" under "Governance and Institutional Support" to state "Many local and regional agencies are not structured or resourced to implement or maintain multi-benefit flood improvements, so the state should provide funding to these agencies for staff (not just consultants) to manage, develop, and seek funding for projects."</p> <p>PD Follow-up Comment: Yolo County staff request DWR add "and professional staff" after "proper authorities." The goal is to ensure these entities have their own staff (not just consultants) to lead the agency and important projects in rural areas.</p>	<p>Revised as requested.</p>	<p>Yes.</p>

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
133	Yolo County	Yolo County	Coordination with Federal Agencies Policy Issue	<p>WD Comment: The item under "Highlighted Accomplishments" related to the NFIP program does not go far enough. The language is currently as follows: "DWR continues to support FEMA's Community Assistance Program – State support Services Element by serving as the State NFIP Coordinating Office. DWR continues to provide technical services assistance, education, and outreach to California communities in the NFIP and evaluate community performance in implementing the NFIP floodplain management activities. DWR continues to improve coordinate and collaboration to NFIP stakeholders."</p> <p>PD Follow-up Comment: The updated April 2022 draft does not appear to contain this language in the recommended location.</p>	<p>WD Comment: The CVFPP Update should include a new bullet in Coordination with Federal Agencies under " Areas for Continuing Conversation," "The State(DWR and the CVFPB) should engage with the Agricultural Floodplain Ordinance Task Force (AFOTF) and FEMA to advocate for the following changes to the NFIP program:</p> <ul style="list-style-type: none"> <li>• Allow umbrella policies where a farmer could bundle multiple low value agricultural structures under a single policy;</li> <li>• Allow limited construction of new agricultural structures in a floodplain when elevation or floodproofing are not practicable; and</li> <li>• Map leveed areas into a new zone that would specifically apply to lands protected by levees, but which do not reach the 100-year level of protection." Application of the National Flood Insurance Program (NFIP) is significantly disadvantaging farmers. Certain provisions of the NFIP, either original or from amendments, work well for suburban or urban communities, but are financially challenging for farmers, often removing the benefits of the program that would otherwise exist.</li> </ul> <p>PD Follow-up Comment: Yolo County staff defers to LSDN RFMP group on recommended next steps.</p>	Updated comment defers to LSDN RFMP group for recommended next steps. DWR will follow up to RFMP group to discuss how comment can be addressed and inform Update 2027.	No.
134	Yolo County	Yolo County	Coordination with Federal Agencies Policy Issue	<p>WD Comment: The item under "highlighted accomplishments related to the NFIP program" does not include a bullet related to researching a state or local flood insurance program for agricultural lands behind levees</p> <p>PD Follow-up Comment: The updated April 2022 draft does not appear to contain this language in the recommended location.</p>	<p>WD Comment: The CVFPP Update should include anew bullet in Coordination with Federal Agencies under " Areas for Continuing Conversation," "Evaluate options for the development of a State or local flood insurance program for ag lands behind rural levees."</p> <p>PD Follow-up Comment: Yolo County staff defers to LSDN RFMP group on recommended next steps.</p>	Updated comment defers to LSDN RFMP group for recommended next steps. DWR will follow up to RFMP group to discuss how comment can be addressed and inform Update 2027.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
135	Yolo County	Yolo County	Funding Policy Issue	<p>WD Comment: The "Areas for Continuing Conversation" under "Funding" includes language related to development of a rural levee standard, concern about the cost burden on rural levee districts, and the difficulty of securing federal cost share. This language is weak and should be strengthened to include an action for the state.</p> <p>PD Follow-up Comment: The updated April 2022 draft does not appear to contain this language; language appears unchanged from first draft.</p>	<p>WD Comment: The existing language for "Areas for Continuing Conversation" related to the rural levee standard, the cost burden on rural levee districts, and the difficulty of securing federal cost share should be strengthened to say "The state will develop a rural levee standard and evaluate options to help small communities and rural levee districts secure funding to meet this standard, including advocating for changes to the benefit-cost ratio for rural levee projects at the federal level used to determine levee funding awards and additional state resources." Yolo County supports development of a rural levee standard and associated priority investment in small community and rural levee repairs. Many of Yolo County's rural levee districts cannot raise sufficient funds at the local level given the small number of landowners and cannot secure any federal funding for projects because of low benefit-cost ratios. They are therefore almost entirely reliant on the state for levee repair and project funding.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	<p>At this time, DWR does not intend to lead the development on a rural levee standard. DWR's rural levee approach has focused on:</p> <ul style="list-style-type: none"> <li>• Restoring levee crown elevations</li> <li>• Repairing and resurfacing levee all-weather access patrol roads</li> <li>• Addressing critical levee integrity repairs first</li> <li>• Effective flood fighting</li> <li>• Robust inspections program</li> </ul> <p>The SSIA portfolio includes significant expenditures for rural levees that include both structural and non-structural actions that incorporate wise use of floodplain concepts, resiliency and flexibility for future conditions, and cost-effectiveness.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
136	Yolo County	Yolo County	Page 2-37	<p>WD Comment: Section 2.4 contains a broad and somewhat vague discussion of the elements of the CVFPP Update which align with other state efforts. This section lacks clarity because it is not divided up into topics. It appears that one potential topic is the use of floodplains as natural infrastructure and the consistency of this CVFPP proposal with other staff efforts, yet this section does not mention that agriculture is the most efficient and effective way to maintain flood bypasses as natural infrastructure, nor that sustainability of the agriculture is necessary to ensure agriculture remains a viable option for continue maintenance of floodplains. The current language is as follows, "Further, this 2022 Update acknowledges the importance and function of flooding as a natural part of riverine and floodplain ecosystems and the natural and beneficial functions of floodplains as natural infrastructure." The language needs to included a discussion of the importance of agricultural land to floodplain management, the importance of agricultural sustainability to this ongoing management, and the increasing efforts of farmers to integrate wildlife-friendly farming techniques into production agriculture.</p> <p>PD Follow-up Comment: The November 2021 language referenced in this comment is on page 2-53 as part of Section 2.9: Aligning with Other State Efforts. The language is unchanged and does not mention the importance of agricultural land to floodplain management in the second paragraph.</p>	<p>WD Comment: The CVFPP Update should include an expanded Section 2.4 that contains a discussion of the importance of agricultural land to floodplain management and the use of floodplains as "natural infrastructure," the importance of agricultural sustainability to this ongoing management, and the increasing efforts of farmers to integrate wildlife-friendly farming techniques into production agriculture, as well as how this work is consistent with other state efforts.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	<p>While DWR has participated in locally-led ag sustainability groups and efforts, for Update 2022 we were not aware of existing State programs for ag sustainability and wildlife friendly ag practices therefore did not actively align with any. This section focuses on activities to align with other State programs. However, these topics have been added in policy issues and recommendations in Chapters 3 and 4.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
137	Yolo County	Yolo County	Page 2-39	<p>WD Comment: The discussion of other state efforts does not include a discussion of the state agencies working on agricultural sustainability.</p> <p>PD Follow-up Comment: It does not appear the April 2022 Draft (starting on page 2-53 in Section 2.9: Aligning with Other Staff Efforts") addresses this comment. The Delta Protection Commission is not mentioned in the entire plan. This section is expanded and the organization is improved, with a section specific to individual plans, such as the CA Water Resilience Portfolio. The Delta Conservancy also is not mentioned, except for to mention elsewhere in the plan they funded a grant related to the Paradise Cut Bypass expansion in San Joaquin County.</p>	<p>WD Comment: The CVFPP Update should include as a topic under "Aligning with Other State Efforts," a description of the work of other state agencies to identify agriculture sustainability strategies. Farmers, the Delta Protection Commission, and DWR are evaluating the projected climate impacts on agriculture, for example, and recognize the importance of maintaining and improving rural levees in response to projected sea level rise. The Delta Conservancy has developed additional studies to conserve agriculture and working lands. The Delta Conservancy's Draft Strategic Plan, for example, contains the Strategic Goal to "Support economically and ecologically sustainable working lands. Increase implementation of sustainable ecologically beneficial farming and agricultural practices." The CVFPP should review these plans and summarize them in this section.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	<p>This section describes efforts by DWR to align the work of the CVFPP with other State efforts over the past 5 years. The team has noted several areas of continuing conversations and other efforts that highlight the importance of agricultural sustainability and agricultural lands for flood risk reduction and other benefits throughout the document. The potential areas for alignment noted in comment will inform scoping for Update 2027. A description of the Delta Conservancy Strategic Plan has also been added to Section 2.9.4.</p>	Yes.
138	Yolo County	Yolo County	Table 2.3	<p>WD Comment: under Watershed and Floodplain Management – Potential adaptation strategies and measures for "flood insurance"</p> <p>PD Follow-up Comment: This table is now Table 2-2: Climate Change Adaptation Types, Actions, and Measures on page 2-31 of the April 2022 draft. The updated draft does not appear to include the requested language.</p>	<p>WD Comment: Add as a potential adaptation strategy and measure continued implementation of the AFOTF recommendations and proposed efforts in rural areas to develop local or state flood insurance program for rural areas.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	<p>Lists of strategies and measures are not exhaustive and represent broad action types, for example "Flood Insurance" is included as a climate change adaptation action. The comment represents a much higher level of detail than what is intended for this table. More specificity may be added as adaptation strategies are explored for future updates. This comment may inform scoping for Update 2027.</p>	No.
139	Yolo County	Yolo County	Table 2.3	<p>WD Comment: There is no management action category for "Agricultural Sustainability" in Table 2-3. Agriculture must adapt to climate change just like other elements of the flood system and should be included in this table as a separate category.</p> <p>PD Follow-up Comment: In the April 2022 Draft of Table 2-3 (now Table 2-2), the title "Management Action Category" has changed to "Climate Change Adaptation Type." Agricultural Sustainability has not been added as a Climate Change Adaption Type to this table as requested.</p>	<p>WD Comment: Add "Agricultural Sustainability" as a management action category with potential adaptation strategies and measures for agricultural lands which are part of the flood system.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	<p>Agricultural sustainability considerations are included under the watershed and floodplain management action specifically within easements and land use. For the CVFPP, agricultural sustainability is considered to fall under our land use categories throughout the document. We do not plan to add new categories at this time, but further changes can be considered for Update 2027.</p>	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
140	Yolo County	Yolo County	Table 2.3	<p>WD Comment: The management action category for "Ecosystem Management" in Table 2-3 does not include an adaptation strategy and measure for wildlife-friendly agriculture.</p> <p>PD Follow-up Comment: The April 2022 Draft of Table 2-3 (now Table 2-2) does not appear to include this potential adaptation strategy.</p>	<p>WD Comment: Add as a potential adaptation strategy and measure, "Work with growers and landowners to improve and expand wildlife-friendly agriculture, including paying for growers to learn and implement new techniques which may have economic impacts."</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	Bullet added to Table 2.2: "Identify and promote wildlife-friendly agricultural practices and technology."	Yes.
141	Yolo County	Yolo County	Page 3-9	<p>WD Comment: The list of regional priorities provided by the six RFMPs does not include any mention of improvements to rural levees or agricultural sustainability. Yolo County finds it hard to believe the RFMPs did not identify these two items as priorities and would like more information about the process for setting these priorities and/or would like "rural levee improvements" and "agricultural sustainability" added to the list.</p> <p>PD Follow-up Comment: The April 2022 version does not contain this change, even though this is the section description the local RFMP. This section on "Regional Priorities" is now on page R-6 and R-7.</p>	<p>WD Comment: Add "Priority rural levee improvements" and "Implementation of agricultural sustainability actions" to the list of RFMP priorities, as well as provide a description in the CVFPP Update as to how the priorities were established. Did they use criteria? Who made the final decisions are priorities?</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	Bullets reflect summary of priorities that were mentioned in 2 or more RFMP priority white papers. Rural levels are mentioned in this bullet "Continuing urban actions, but also refocusing efforts in small and disadvantaged communities and critical repairs in rural areas" and agricultural sustainability is mentioned in "Achieving a sustainable balance among flood risk management, ecosystem vitality, agriculture, recreation, and other benefits important to the regions."	No.
142	Yolo County	Yolo County	Table 3.2	<p>WD Comment: Table 3-2 does not include a bullet under "Rural Actions" for ag sustainability, which is an ongoing action to sustain agriculture in the floodplain. The CVFPP talks about the importance of funding ongoing invasive weed removal in the flood system, but does not talk about funding agricultural sustainability efforts to ensure growers can continue to provide vegetation maintenance or implement wildlife-friendly techniques in floodplains that benefit the system.</p> <p>PD Follow-up Comment: In the April 2022 version, Table 3.2 is now Table 3.1 and is still on page 3-12. The requested bullet has not been added to "Rural Actions."</p>	<p>WD Comment: Add a bullet under "Rural Actions" as follows "Agricultural sustainability implementation, planning, and performance tracking"</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	Unfortunately, we are unable to add or remove management action categories for the 2022 Update due to category use in investment tracking and planning. This may be considered for development for the 2027 Update. Projects of this type, if provided by the RFMPs as having a flood risk reduction benefit, would fall under the local land use planning category.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
143	Yolo County	Yolo County	Page 3-17	<p>WD Comment: The spotlight includes language related to the aligning ecological improvements and environmental sustainability, but does not include a bullet in the list of potential elements related to sustainable agriculture.</p> <p>PD Follow-up Comment: In the April 2022 version, the Yolo Bypass-Cache Slough Program spotlight is now on page 3-18. The April 2022 version has new language as follows, "Support actions to sustain floodplain agriculture, recognizing the benefits it provides to the flood system such as drainage improvements, wildlife-friendly agricultural techniques, and other actions developed in coordination with local growers and landowners."</p>	<p>WD Comment: Add a bullet to the list in the second paragraph outlining the potential elements of a multi-benefit program as follows, "Implement actions to sustain agriculture which benefits the flood system, such as construction of drainage improvements, incentives to utilize wildlife-friendly agricultural techniques, monitoring of project impacts on agriculture, and other actions developed in coordination with local growers and landowners."</p> <p>PD Follow-up Comment: This language is very similar to the language requested by Yolo County, with the exception of "support" instead of "implement." Yolo County staff recommend continuing to advocate for the use of the word "implement" and to use this language in other places in the CVFPP draft where it will direct the state to take action on ag sustainability in the floodplain.</p>	Revised as requested.	Yes.
144	Yolo County	Yolo County	Page 3-29	<p>WD Comment: "The rural portfolio supports critical repairs for rural levees and hydraulic structures, along with an emphasis on traditionally nonstructural approaches, such as land acquisitions in fee or easements and habitat restoration and reconnection actions. State supports maintaining levee crown elevations and facilitating inspections/flood fighting... Land acquisitions in fee or easements can reduce risk intensification from future population growth and improve the system's ability to attenuate floods. Rural habitat restoration can restore and reconnect historic floodplains, improve water quality, and provide habitat for salmonids, migratory birds, and waterfowl while maintain agricultural production. Rural flood risk reduction actions that can achieve multiple benefits may increase in priority in context of each program that implements actions in rural areas. "</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on whether this has been addressed</p>	<p>WD Comment: Concern that repairs and improvements to the levee and hydraulic structures will only be performed and prioritized only if existing agriculture land can become modified to accommodate ecological habitat or be replaced by ecological habitat all together. As noted in the 2014 LSDN RFMP, farmers have a number of solutions available for reducing the impact of increasing flood risk due to climate change. Floodplain management strategies in agricultural areas can take many forms. Farmers can protect their land from floods by planting trees, changing their crops types, or restoring riparian vegetation. Such measures can help lessen flooding impacts on farmlands as well as downstream areas. Agriculture in the Central Valley is adapting to the altered conditions in order to sustain production. Would like to see an emphasis in supporting the modernization of FEMA's NFIP on agriculture.</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on recommended next steps.</p>	DWR recognizes that landowners/farmers have a number of solutions available for reducing their residual risks and impacts of flooding, but there is not a State role in these decisions, so these types of actions have not been included in the portfolio. To be responsive to the comment, the following text has been added to the section "Agricultural landowners may also consider measures to reduce flood impacts on and downstream of their properties, such cropping decisions, land management, and off-season irrigation."	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
145	Yolo County	Yolo County	Page 3-31	<p>WD Comment: Since new or improved levees in rural areas have potential to intensify risk in SPFC floodplains by potentially encouraging development the 2022 SSI portfolio emphasis actions to address critical repairs, pursue multiple benefit projects and floodplain management in rural areas consistent with the CVFPP.</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on whether this has been addressed</p>	<p>WD Comment: This is a problematic statement. First, land-use agencies and County floodplain managers have set aside agricultural areas to remain in agriculture and are not planning development in the floodplain. Emphasizing actions that only address "critical" repairs is subjective. It's a system – need to fix the system, not just parts of it.</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on recommended next steps.</p>	Revised text is included in the 2022 CVFPP Update to connect to system impacts and strategies. The example project list includes connecting rural actions to larger regional strategies to reflect potential for system benefits.	No.
146	Yolo County	Yolo County	Table 3.3	<p>WD Comment: The highest priority policy recommendations in the CVFPP 2022 Update, as listed in Table 3-3, do not include agricultural sustainability.</p> <p>PD Follow-up Comment: The April 2022 Draft has Table 3.3 entitled "High-Priority Policy Issue Recommendations for CVFPP and Agency Leads." Recommendation #12 has been amended to include the following NEW language: "Develop landscape-scale agricultural sustainability strategies alongside environmental conservation strategies to promote sustainable floodplain land uses that are compatible with periodic flooding and adaptive to climate change."</p>	<p>WD Comment: Add a priority policy recommendation to Table 3.3 as follows "Explore, create an implement an agricultural sustainability strategy to ensure agricultural land is protected, the impacts of projects on agriculture are minimized, and growers and landowners are encouraged to expand efforts to maintain vegetation, adopt wildlife-friendly agricultural techniques, and otherwise provide benefits to the flood system."</p> <p>PD Follow-up Comment: Yolo County staff strongly supports this new addition, but also recommend strengthening it to include minimizing impacts on agriculture from projects where feasible.</p>	The CVFPP considers actions that to reduce impacts to agriculture are already a part of agricultural sustainability strategies. Change not made as requested.	No.
147	Yolo County	Yolo County	Table 3.3	<p>WD Comment: Per a previous comment, this recommendation mentions "wise use of floodplains" but does not define it. This recommendation also does not mention agricultural sustainability.</p> <p>PD Follow-up Comment: The April 2022 Draft does not appear to include this change.</p>	<p>WD Comment: Define "wise use" of floodplains (or how the definition will be developed) and add a bullet to this recommendation as follows, "Opportunities to sustain agriculture."</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	Wise use of floodplains was defined in 2017. The 2022 CVFPP Update includes a bullet on working lands added to this recommendation. The definition of "wise use of floodplains" was added to Useful Terms section.	Yes.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
148	Yolo County	Yolo County	Table 3.3	<p>WD Comment: Recommendation 07 includes great language to potentially undertake an effort to, "Promote agricultural land stewardship and sustainability in multi-benefit project planning by leveraging regional flood management planning and partnerships to support the development and standardized use of relevant data and tools." This language should explicitly mention collecting information, both qualitative and quantitative, on the impact of proposed flood management and habitat enhancement projects on agriculture.</p> <p>PD Follow-up Comment: The April 2022 Draft does not appear to include this change.</p>	<p>WD Comment: Edit the bullet on ag land stewardship and sustainability as follows, "Promote agricultural land stewardship and sustainability in multi-benefit project planning by leveraging regional flood management planning and partnerships to support the development and standardized use of relevant data and tools, including the impact of proposed projects on agriculture during the development of project options (not the EIS/EIR)."</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	Feasibility studies should be conducted on a project-by-project basis to evaluate the economic impacts of projects (both positive and negative impacts). Added "to identify the potential positive and negative effects of a proposed project." to bullet in response to this comment.	Yes.
149	Yolo County	Yolo County	Table 3.6	<p>WD Comment: Table 3-6 contains a societal benefit of "produce or maintain economic benefits on floodplains" and identifies an indicator as "acres preserved for agricultural or industrial productivity." This indicator does not recognize that acres are not the only measure of agricultural or economic productivity.</p> <p>PD Follow-up Comment: The April 2022 Draft does not appear to include this change.</p>	<p>WD Comment: Add an indicator for this societal benefit that addresses the fact that agricultural sustainability is more than the number of acres preserved for agriculture. Yields should also be a measure, as well as input costs. In the Yolo Bypass, for example, agricultural economists at UC Davis were able to measure the potential impacts on rice yield from inundation in the Yolo Bypass past a certain date, since rice growers typically start preparing their fields in March and any delay can cause a decrease in yield and therefore have an economic impact.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	The 2022 CVFPP Update includes an additional metric of total value of acres preserved in dollars. Future CVFPP Updates may consider additional indicators, such as net income, gross income, employment, etc. Once we have the physical metric of acres the other indicators can then be measured. These will be considered as the performance tracking framework is implemented and refined for future updates.	No.
150	Yolo County	Yolo County	Table 4.1	<p>WD Comment: If Yolo County's recommendations on the CVFPP Update are implemented, this table should change to include investments in agricultural sustainability.</p> <p>PD Follow-up Comment: The April 2022 Draft does not appear to contain any investments for agricultural sustainability.</p>	<p>WD Comment: Update this table after decisions are made about inclusion of agricultural sustainability efforts to reflect the investment.</p> <p>PD Follow-up Comment: Continue to strongly advocate for inclusion of funding or agricultural sustainability strategies mentioned as a high priority recommendation as Yolo County's top request.</p>	The 2022 CVFPP Update includes a description of some agricultural sustainability activities included in the risk awareness, floodproofing, and land use planning ongoing investment category. Agricultural sustainability is included as provided by RFMPs and other project proponents as a part of flood risk reduction projects.	No.
151	Yolo County	Yolo County	Page 4-18	<p>WD Comment: State Flood Insurance Program – average historical expenditures</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on whether this has been addressed</p>	<p>WD Comment: Yolo County understands UC Davis has pulled together information related to historical expenditures with NFIP for comparison.</p> <p>PD Follow-up Comment: Yolo County staff defers to the LSDN RFMP group on recommended next steps.</p>	Updated comment defers to LSDN RFMP group for recommended next steps. DWR will follow up to RFMP group to discuss how comment can be addressed and inform Update 2027.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
152	Yolo County	Yolo County	Page A-12	<p>WD Comment: The list of three items on which the 2022 CVFPP Update is focused does not include agricultural sustainability. Given the importance of expanding floodplains to address climate change, and the importance of maintaining agriculture in these expanded floodplains, agricultural sustainability should be the 4th focus item.</p> <p>PD Follow-up Comment: It does not appear the April 2022 Draft includes this change.</p>	<p>WD Comment: Add "Agricultural Sustainability" as a fourth focus item.</p> <p>PD Follow-up Comment: Yolo County staff continues to recommend this change.</p>	The 2022 Update themes were identified years ahead of the update draft release to inform areas of analysis, research, and alignment to be documented in the 2022 Update. It is too late in the planning process to agricultural sustainability as an area of focus of 2022 Update. The 2022 Update does acknowledge the importance of agricultural sustainability to our local partners in the Central Valley.	No.
153	LSDN RFMP	LSDN RFMP	Overall Document	The Lower Sacramento River--Delta North Regional Flood Management Program (LSDN RFMP) Regional Working Group (RWG) has reviewed the Public Draft of the CVFPP Update. Some of our local agencies have prepared their own comments specific to their concerns. These were coordinated with the RWG and the LSDN Region supports consideration of these during the final drafting of the CVFPP 2022 Update.	The LSDN Region appreciate the active engagement with DWR and the CVFPB during the development of this Update. We look forward to continuing to work together as you finalize the 2022 Update and supporting documents	Thank you. Comment noted.	No.
154	LSDN RFMP	LSDN RFMP	Overall Document	The LSDN RWG has a vested interest in working with DWR and CVFPB staff to develop a near term timeline and strategy toward implementing the priority policy issues	The Region looks forward to continue to work together on implementation of the priority policy issues to ensure that the Region's interests in these priority policy issues result in - on the ground changes.	Thank you. Comment noted.	No.
155	Reggie Hill	USJR RFMP	Overall Document	Support for actions/project described in the USJR Priorities White paper submitted to DWR are not fully detailed but are instead included in overall concerns.	Need to add additional details to each RFMP section to highlight regional challenges.	Regional challenges provided in each RFMP overview highlight primary flood management challenges identified by each region and are not intended to be an exhaustive list. The CVFPP will continue to work with RFMPs to understand and address regional challenges through RFMP planning efforts.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
156	Reggie Hill	USJR RFMP	Figure 3.2 and 3.3	The Merced area continues to be ignored in the CVFPP and supporting DWR technical analyses. The area includes the Black Rascal Creek Diversion Channel (a SPFC facility) that protects the City of Merced and the adjacent disadvantaged Community of Franklin/Beachwood. Both the city and community experience severe flooding in 1997 and 2006 from overflows of the creek and channel. The City of Merced is required to meet 200-year flood protection per SB5. DWR is currently providing Small Community Flood Risk Reduction funding to support the Black Rascal Creek Flood Control Project. Because USACE didn't include the Merced area in the Comp Plan over 20 years ago is not justification for continuing to ignore the significance of flood issues in the Merced area.	Need to include the Merced area in H&H analysis.	The Sacramento and San Joaquin River Basins used in the 2022 CVFPP risk analysis were originally developed for the 2000 Comprehensive Study led by the USACE. At that time, the river basins and inclusive impact areas used for the risk analysis were based on potential flooding along the main stems and tributaries of the Sacramento and San Joaquin Rivers and not necessarily areas protected by the SPFC. Thus, Merced was excluded (along with some other communities), and that has continued through the 2022 CVFPP risk analysis. However, the focus of the CVFPP is upon areas protected by SPFC facilities, which applies to Merced. We are currently evaluating how to expand the study areas used for the risk analysis for a variety of reasons, including areas protected by SPFC facilities not currently included in the CVFPP risk analysis. This is a priority discussion concerning how to improve the 2027 CVFPP risk analysis.	No.
157	Reggie Hill	USJR RFMP	Page R-3	The costs associated with O&M and OMRR&R are increasing. While O&M revenue sourcing is mentioned as a challenge in the USJR, clear solutions are not articulated.	Need to addressing the challenges associated with O&M given that onerous permitting and compliance issues and rising costs of labor and materials make the implementation of flood management actions, and even routine operations and maintenance (O&M), difficult if not impossible. These issues and deficiencies challenge the function and reliability of the flood management system.	Added "Increasing costs associated with OMRR&R" to the list of region challenges in response to the comment.	Yes.
158	Reggie Hill	USJR RFMP	Page 2-60	Issues with the SJ River Restoration Program (SJRRP) related to infrastructure modifications and increased O&M costs are not addressed.	Address the SJRRP with included points on maintenance of flood bypass infrastructure and vegetation management under wetted conditions.	The CVFPP recognizes the SJRRP is one of several programs that require alignment and that influence the CVFPP Update and planning. This alignment is ongoing, and any flood management concerns related to SJRRP implementation are a part of continuing conversations. Costs to maintain the current system are included in the portfolio and any updates related to increased O&M costs will be considered for future updates.	No.
159	Reggie Hill	USJR RFMP	Page R-3	There is a need for greater funding for rural and disadvantaged communities such as funding provided by the Small Community Flood Risk Reduction Program and FSRP. Most communities don't have funds for cost share or staff to prepare funding applications.	Need to add the challenge of a lack of funding for FSRP and Small Community Flood Risk Reduction programs in this section, given that nearly all cities in the region are DACs based on per capita income levels.	Added "Much of the area is represented by rural and disadvantaged communities and more funding is needed" to the list of region challenges in response to this comment.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
160	Reggie Hill	USJR RFMP	Page R-3	The USACE deauthorization of the San Joaquin River Flood Control Project is not addressed adequately. It is only mentioned once in the document.	Need to add details such as the July 2015 letter from USACE which resulted in 192 miles of levees being deauthorized and ineligible for assistance from the USACE Public Law (PL) 84-99 disaster assistance and rehabilitation program. The State (DWR and CVFPB) has only recently responded to the 2015 letter from the USACE, leaving the LSJLD without PL 84-99 federal emergency funding.	This issue is mentioned in the region overview and in sections related to Water Resilience Portfolio 25.4 under modifying the SPFC. This issue has been captured as a priority action under the collaborative process to respond to WRP 25.4. Through that effort, a draft action plan is under development and conversations are ongoing. These efforts will inform Update 2027. The CVFPP team will continue to work with the LSJLD and the USJR RFMP to resolve this issue.	Yes.
161	Reggie Hill	USJR RFMP	Page 2-58	There is a need for more coordination with SGMA GSPs looking to divert flood waters out of the flood bypass. Land subsidence is mentioned as a problem in the San Joaquin Valley but flood water diversion is not addressed.	Flood water diversion as it relates to SGMA GSPs needs to be addressed within the document. Additionally, consider adding that funding for coordination with SGMA GSPs is essential for understanding the impacts of flood water diversion on the systemwide and regional-scale.	DWR agrees that more coordination is needed between flood and groundwater managers. Coordinated management of flood and groundwater is being evaluated in the San Joaquin Basin watershed studies, which are scheduled for completion in 2024.	No.
162	Reggie Hill	USJR RFMP	Page 2-5	Opportunities under 25.4 to improve conditions in USJR are not fully discussed. They are elaborated upon in great detail but a next-steps section or paragraph on potential improvements as a result of the legislation is lacking.	Need to add text on implementation and goals of potential improvements.	Chapter 2 focuses on accomplishments since the last CVFPP Update and focuses on the collaboration on WRP Action 25.4, so this section would not include implementation strategies. The CVFPP team initiated the "action planning" process to develop implementation strategies for the priority action identified in the 25.4 collaboration process. There is a current effort to better scope and resource these action plans - this is a parallel effort and information was not ready in time for publication.	No.
163	Reggie Hill	USJR RFMP	Overall Document	Recognition and proposed funding for Tier 1 projects identified in the RFMP updated project list is not included.	Mark the near-term projects within the public draft based on this project list	Project timelines indicated by RFMPs do not necessarily align with investment priorities and phasing over the 30-year planning horizon. Regional priorities are intended to be highlighted in the Upper San Joaquin regional overview.	No.
164	Reggie Hill	USJR RFMP	Page R-3	The impacts of subsidence to flood conveyance capacity and local infrastructure are extremely concerning and will impact flood operations. Diminishing capacity is mentioned as a challenge but effects on infrastructure is missing.	Subsidence due to deep well groundwater pumping has caused a significant decrease in flood bypass conveyance capacity and damage to local infrastructure. Need to add discussion to issues in the CVFPP.	Added "and damage to infrastructure" to bullet in list of challenges.	Yes.
165	Willie Whittlesey	Yuba Water Agency	Overall Document	On behalf of Yuba Water Agency, we appreciate this opportunity to provide comments on the draft 2022 Central Valley Flood Protection Plan Update (draft CVFPP).	None.	Thank you. Comment noted.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>Yuba Water Agency (Yuba Water) was established by the State of California in 1959 to develop and promote the beneficial use and regulation of the water resources of Yuba County. Yuba Water’s primary mission area of flood risk reduction is of critical importance in a region with history of catastrophic flooding. Yuba Water’s work over the past 60 years, including the construction and operation of New Bullards Bar Dam and Reservoir on the North Yuba River, has significantly reduced flood risk in Yuba County and across the draft CVFPP’s Feather River Region.</p> <p>Working with state, federal and local partners, including the Central Valley Flood Protection Board, Yuba Water has been able to further enhance flood protection by providing extensive technical, policy and financial support for projects and initiatives in the Feather River Region. We appreciate the inclusion of many of these efforts as “accomplishments” in the draft CVFPP, including:</p> <ul style="list-style-type: none"> <li>• Significant progress toward 200-year flood protection for urban areas.</li> <li>• Continued efforts to secure 100-year flood protection.</li> <li>• Advancing flood protection for small and rural communities.</li> <li>• Successful multi-benefit project implementation.</li> <li>• Piloting creative funding approaches.</li> </ul> <p>While these collective efforts have significantly enhanced flood protection in Yuba County and across the surrounding region, Yuba Water remains committed to continued work on additional measures to further reduce flood risk. We appreciate and support the inclusion of many of these ongoing and planned priority activities in the draft CVFPP, including:</p> <ul style="list-style-type: none"> <li>• Completion of projects currently under construction, including improvements to the Marysville Ring Levee.</li> <li>• Successful efforts to implement Yuba-Feather forecast-coordinated operations (F-CO).</li> <li>• Ongoing coordination to evaluate and implement Yuba-Feather forecast-informed reservoir operations (FIRO).</li> <li>• Collaboration with the Scripps Institution of Oceanography and the Center for Western Weather and Water Extremes to advance understanding of atmospheric rivers through</li> </ul>			

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>focused research in the Yuba River watershed to support Yuba-Feather F-CO/FIRO.</p> <ul style="list-style-type: none"> <li>The development of Yuba Water’s comprehensive flood risk management planning study.</li> </ul> <p>Finally, we appreciate the draft CVFPP’s continued inclusion of Yuba Water’s proposed Atmospheric River Control Spillway (ARC Spillway) as a component of the State Systemwide Investment Approach. As described in a “Project Spotlight” included the draft CVFPP:</p> <p>[The ARC Spillway] is a critical public safety initiative that will allow for implementation of FIRO for Lake Oroville and New Bullards Bar Reservoir, which would significantly reduce flood risk and improve climate change resilience for communities along the Yuba-Feather rivers system. With the new spillway gates at a much lower elevation in the reservoir and new operational procedures in place, YWA will be able to release more water in advance of large storm events and reduce peak flood releases downstream.</p> <p>Design for the New Bullards Bar new secondary spillway is underway to decrease flood risk to urban and non-urban areas downstream; protect State, federal, and local investments in improved levees; provide environmental and water supply benefits; and increase system adaptability to climate change by increasing storage capacity and providing enhanced operational flexibility for FIRO.</p> <p>As detailed in the draft CVFPP, the construction and operation of the ARC Spillway will advance a broad range of benefits and priorities, including state, federal and local interests. Completion of the project on the timeline described in the draft CVFPP (“Construction is scheduled to start as early as 2023 and expected to be complete in 2027.”) will require all of these interests to contribute technical support, funding, and other assistance to help move the project forward. Yuba Water is committed to advancing the ARC Spillway and has invested \$11 million in the design of the ARC Spillway to date, with 100% design expected later this year. With the completion of the ARC Spillway project’s design, we look forward to focused engagement around the comprehensive coordination that will be necessary to advance the project and its critical benefits.</p>			

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
166	Matt Conover	General Public - John McCormack Company	Overall Document	<p>I'm on page 167 of 222, at 4:50 pm, and still have not found any mention of flood control for the Cosumnes River, and overflow when joining Mokelumne near I-5 and overflowing into Lost Slough, past McCormack-Williamson Tract's DWR weir.</p> <p>It threatens overflow of our levees north of there, at the bottom of RD 1002, West of I-5, north to Lambert Road, and East to the SPRR at Franklin Blvd and Twin Cities Rd. between Walnut Grove and Galt.</p> <p>DWR's Tunnel Launch facility is planned for that corner, so you risk flooding that out during its proposed construction, if ever it occurs.</p> <p>I commented at hearing, and will try to go to July-Aug. Workshops.</p> <p>We need a dam on the Cosumnes, not breaking down levees to flood our RD for habitat. 100-year old ranches, employees, etc.</p>	None.	DWR recognizes the convergence of challenges in the Delta - flood risk, water supply, salinity, agricultural sustainability, and ecosystem needs. Chapter 2 has been updated to note Delta Legacy Community StoryMaps and a link. These StoryMaps characterize the unique issues in these communities.	Yes.
167	Marian Rawlins	General Public	Overall Document	<p>My name is Marian Rawlins, 5880 E. Fig Ave., Manteca, CA. 95337. In regards to the above-mentioned CVFPP Update, I as well as other landowners have a need to be considered. We are all Stakeholders. In our case we are External Stakeholders. We fall into one of these categories, "Unaware", "Resistant", "Neutral", "Supportive". Never-the-less, these landowners in the Manteca area south of Peach Avenue and West of Union Road that border the San Joaquin River to the south and to the west are still Stakeholders. These External Stakeholders will be adversely affected by the Central Valley Flood Protection Plan (CVFPP).</p> <p>San Joaquin Area Flood Control Agency, (SJAFCA) had previously sent a "Notice of Preparation of an Environmental Impact Report and Scoping Meeting for the Mossdale Tract Area Urban Flood Risk Reduction Project". The Placement of the Dry Land Levee, as it is shown in SJAFCA's Proposal, will create and additional flooding in the area south of its placement. To the north of the Dry Land Levee, with the use of slurry walls, there is the ever present danger of disrupting the flow of ground water to those with wells and agriculture. In addition there remains the ever present danger of an additional three feet of flood waters to areas previously flooded and flood waters to those not previously flooded. With Nile Garden School being approximately a half-mile (1/2 mile) to the south near the corner of Nile and Union Road, there is the danger of additional floodwaters reaching the</p>	None.	The CVFPP is a broad planning framework; individual projects must still undergo thorough project-specific public review in accordance with existing laws and procedures. DWR encourages interested local stakeholders to be involved in their local and regional flood management public forums to inform decisions and better understand how proposed projects will impact or benefit them. At a programmatic level, the impacts and benefits of the CVFPP are analyzed in the 2017 Supplemental Environmental Impact Report; and being updated through an addendum for the 2022 Update that is scheduled for completion along with the main document.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
				<p>school. (Reference point), during the flood of 1997, floodwaters were with 100 yards of reaching Nile Garden School. Imagine was another three feet of water could do.</p> <p>Every project has stakeholders and those stakeholders are ultimately divided into two group:</p> <p>Internal Stakeholders are those who are within the organization. The project directly benefits from them. (Cities, Government Planning, Bank, Developers, etc.</p> <p>External Stakeholders are those people who are outside of the organization and are indirectly impacted by the project. They do not benefit from this instead they are DIRECTLY EFFECTED BY THE PROJECT.</p> <p>Also attached please fine copy of letter signed by 81 External Stakeholders along with list of the 81 External Stakeholders submitted to the San Joaquin Area Flood Control Agency (SJAFC) Attached is email receipt of 81 letters received by SJAFC.</p>			
168	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>The feasibility studies for the five Sac County communities were just completed in February of this year, and the city of Isleton’s Small Community study is scheduled for completion before July 1 of this year, within the next 40-45 days.</p> <p>A couple of these communities have also submitted Pending Prop 68 grant applications and accompanying BRIC NOI’s with Cal OES, namely for the disadvantaged communities of Isleton and Locke to potentially implement flood risk reduction measures identified in the studies and potentially implement a new flood insurance program for the Delta Region with the recent formation of a Geological Hazard Abatement District (or a GHAD) that was established in late March of this year by the citizens of Isleton.</p>	None.	Thank you for your comment at the Public Hearing and bringing the StoryMaps and work completed to the CVFPP Team. Content has been added to Chapter 2 to reflect this work.	Yes.
169	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>The Sac County projects have included the development of community-specific ESRI story map web-based sites for each individual community, namely for:</p> <p>Hood, Courtland, Locke, Ryde, and both sides of Walnut Grove (east and west-including Ryde);</p> <p>and a separate website has also been developed for the City of Isleton’s flood risk reduction feasibility study.</p> <p>The websites identify the flood risks for each of the communities, and preferred flood risk reduction management actions... and the websites host the subject feasibility studies and all of their supporting technical appendices.</p>	None.	Thank you for your comment at the Public Hearing and bringing the StoryMaps and work completed to the CVFPP Team. Content has been added to Chapter 2 to reflect this work.	Yes.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
170	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>In reviewing the draft 2022 CVFPP update, including the inserted "Overview of Regional Flood Management Planning Areas, there is unfortunately little or no discussion of the subject small communities in the Lower Sac – North Delta RFMP. I hope this is largely due the subject studies not being completed until recently over the last couple of months. I also see where in the current reference section of the 2022 CVFPP draft there are useful web links to the RFMPS, but you should know the Lower Sac - Delta North weblink is not active. It would be ideal if the updated plan could also include the weblinks to each of the Sac County, and Isleton community-specific flood risk reduction web sites. These websites are quite informative and similar to the RFMP websites We are more than happy to provide the links to the CVFPP planning team. They are located here <a href="http://sacdelta.stormready.org/">http://sacdelta.stormready.org/</a> for the Sacramento County unincorporated Delta Legacy Communities of Hood, Courtland, Locke, East Walnut Grove, and West Walnut Grove/Ryde; and for the incorporated city of Isleton the links are provided here for the City of Isleton’s story map and the resources page. I think it would be great to include the noted links directly into the RFMP section for the Lower Sac North Delta Region, versus in a subsequent reference section. Do you think this might be possible going forward with the final draft?</p>	None.	Lower Sacramento Delta North RFMP website has been updated to link to the online RFMP plan, consistent with DWR's Regional Management Planning website. Added links to community-specific StoryMaps to Useful Links.	Yes.
171	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>Through our study and planning efforts in the Lower Sacramento – Delta North Region significant progress is being made on the Community-Based Flood Insurance program for the Delta region, with the Delta Region GHAD being recently launched by the citizens of Isleton on March 29 of earlier this year; and there is interest by both the director of DWR and the State Insurance Commissioner’s Office to explore community-based insurance pilot programs for not only the Delta Region, but possibly for the entire CVFPP planning area and potentially larger portions of the State. I see where there is some mention about pursuing alternatives to augment or provide an alternative to the NFIP within the CVFPP planning area. Hopefully these current efforts and those briefly mentioned in the current CVFPP update will materialize to a viable alternative to the current NFIP options for securing flood insurance, for not only small communities but for all areas, including urban areas located behind SPFC levees.</p>	None.	As efforts progress, the CVFPP team will consider how to best include in future updates.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
172	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>A common demand exists within a number of the Delta Legacy Communities to fund and repair several outstanding DWR Flood System Repair Project (FSRP) critical and serious sites requiring immediate, short-term attention in several RDs as well as within DWR MA9. I'm aware that Sac County and the communities of Courtland and Hood have had some limited dialogue in connection with DWR, including MA 9 representatives to prioritize funding associated with repairing the noted, outstanding FSRP sites... but it has not led to any real enhancement to potentially implement the needed repairs to the long-standing known FSRP serious and critical repair sites.</p> <p>In reviewing the regional overview for the Mid and Upper Sac River Region RFMP I see where similar challenges exist with having State Maintenance Areas operating out of the Sutter maintenance Yard also not being able to conduct substantial repairs and/or capital improvements, largely due to financial constraints to fund long-term multi-year projects. Hopefully some solutions can also be provided and secured through the current CVFPP planning efforts to secure additional funding that appears to be limited to annual general funds.</p>	None.	Funding and completing outstanding repairs and system deficiencies are critical to achieving the flood risk reduction goals in the plan. Chapter 4 indicates that more funding is needed to complete this work. The CVFPP recommends accelerated and urgent investment in communities with the highest flood risk and vulnerability.	No.
173	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>All of the Delta Legacy Communities not only contain significant cultural and historic values to the Delta and greater Central Valley Region, but several are also deemed disadvantaged or severely disadvantaged communities (DACs);</p> <p>It is good to see that Environmental Justice and Equity are now being considered when prioritizing investments in the CVFPP planning area as stated in Chapter 2 and Table 3.3 of your update. This would hopefully lead to some greater prioritization for the flood risk reduction measures for the subject disadvantaged communities in the Delta and other similar communities, containing several minority interests.</p>	None.	The CVFPP recommends continued efforts to identifying the most vulnerable communities and advance equity in flood management to be included in future updates.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
174	Jeff Twitchell	Delta Legacy Communities	Overall Document	<p>As recommended and mentioned in Table C-6 of Appendix C of the draft 2022 CVFPP, the draft update recommends using the Feather River Corridor Management Plan (CMP) as an example to help or better frame opportunities for multi-benefits and help define the RFMPs. As a former participant of the Feather River CMP planning efforts, I found that Corridor Management Plan very useful for implementing projects, particularly those containing multi-benefits, and some competing interests within the floodplain.</p> <p>Representative of the Delta Legacy Communities see a large opportunity to do the same for the Lower Sac River Corridor protected by SPFC levees between Freeport on the north, upstream end and Rio Vista on the south, downstream end. This geographic corridor area would encompass all of the 9 Delta legacy communities protected by SPFC levees that are all within the Lower Sacramento River Corridor.</p> <p>This CMP could also mimic or follow some of the current positive activities in the nearby Yolo Basin Cache Slough Partnership within the Lower Sac -Delta RFMP that could address flood risk reduction, ecosystem multi benefits, water conveyance benefits, and advance planning of the Great California Delta Trail. The subject Trail could be routed on former rail embankments and levee systems in the north and central portion of the Delta within the Sacramento River Corridor. This was most recently identified in the DPC's Great California Delta Trail Masterplan that was just released and adopted by the DPC this last January 20th, (4-5 months ago). The formulation of the CMP could also ultimately garner greater consistency to the Delta Plan Consistency Determination with the DSC as mentioned in Appendix B, Section B3.3.4 of the current draft plan.</p>	None.	DWR will coordinate with the RFMP to consider how an effort like this could inform future updates.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
175	Jeff Twitchell	Delta Legacy Communities	Overall Document	There is also one common structural management action or flood risk reduction element for each Delta Legacy Community to repair and improve-in-place several miles of the existing SPFC levee system upstream of and near the Delta Cross Channel to enhance the reliability and resiliency of conveying State Water Project (SWP) and Central Valley Project (CVP) in the north Delta as a viable alternative to other proposals to convey water in an isolated (single purpose) conveyance facility. The existing river corridor and the adjoining SPFC levee system serves as a nature-based solution or natural infrastructure for conveying water through the North Delta. The idea of incorporating natural infrastructure wherever possible for multi-benefit projects is favorably mentioned in Section 2.9 of the draft update, and such nature-based infrastructure in the Lower Sacramento River Corridor should be further explored as briefly mentioned in the subject Sac County Delta Legacy flood risk reduction feasibility studies.	None.	DWR will work with the RFMP to track progress of feasibility studies and planning for preferred alternatives.	No.
176	Jeff Twitchell	Delta Legacy Communities	Overall Document	The Sac County Delta Legacy communities are hoping they can connect soon with key CVFPP planning staff in upcoming CVFPP workshops prior to finalization of the 2022 CVFPP Update.  We welcome the opportunity to meet with you and your planning team with the thought and goal of ultimately implementing key management action items that have been identified in each of the subject Sac County and Isleton Small Community flood risk reduction studies.	None.	The CVFPP looks forward to connecting at the workshops.	No.
177	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Figure 2.17	Very little discussion is provided on the (SCFRRP) small communities within the CVFPP planning area, unless there was a subsequent Phase 2 funding element. There is no significant discussion regarding the vulnerability to deep flooding in the North Delta Legacy communities, containing potential loss of life, compared to other CVFPP communities in the Sac and San Joaquin planning area/RFMPS (This fact is evident in the 2012 CVFPP Technical Appendices.)	The current section only includes dots on a map where the communities are located, and only indicates if there is a completed, or a non-completed SCFRRP Feasibility Study Report. There could be greater discussion within the RFMP Inserts that should also be formally incorporated into the CVFPP and formally added as chapters or sections. Currently the RFMP discussions are not formally included in the text of the CVFPP.	Further expansion of the regional overviews may be considered as the next update is scoped for 2027 with RFMPs. This is the first time regional overviews were included in the CVFPP and there may be opportunity to include more regional-specific content in future updates.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
178	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Page 2-23	Consistent with the comment above, there should be a larger discussion of the RFMP planning and implementation efforts within a dedicated section or chapter of the CVFPP update. Please note that the Delta Legacy Communities have not been formally invited (aside from the public hearing meetings of May 2022) to participate in the concurrent CVFPP 2022 planning efforts. However, most recently in April of 2022 SAFCA has welcomed input from the Delta Legacy Communities in Sacramento County and is just becoming familiar with some of the key management actions identified for implementation. This is a positive result of the noted communities recently completing their DWR-funded SCFRRP feasibility studies.	Expand discussion of RFMPs, particularly for Lower Sac - Delta North RFMP to include findings and recommendation in 6 -8 SCFRRP Feasibility Studies in the Sac River Corridor between Freeport and Rio Vista. Include separate chapter on RFMPs, and make the RFMPs a larger part of CVFPP update	Further expansion of the regional overviews may be considered as the next update is scoped for 2027 with RFMPs. This is the first time regional overviews were included in the CVFPP and there may be opportunity to include more regional-specific content in future updates.	No.
179	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Page 2-23	The SCFRRP Delta Legacy Communities in Sac County/Isleton have asked SAFCA/RFMP reps to include/list all of its key management action items (structural and non-structural) in the latest RFMP planning efforts. This includes the latest Community-Based Flood Insurance program efforts launched in Isleton with the recent formation of a Delta Region Geological Abatement District (GHAD).	Expand discussion of RFMPs, particularly for Lower Sac - Delta North RFMP to include findings and recommendation in 6 -8 SCFRRP Feasibility Studies in the Sac River Corridor between Freeport and Rio Vista	Further expansion of the regional overviews may be considered as the next update is scoped for 2027 with RFMPs. This is the first time regional overviews were included in the CVFPP and there may be opportunity to include more regional-specific content in future updates.	No.
180	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Page 2-43	Decreased flood risks, as noted, should be balanced with enhanced ecosystems with the long-term viability of Ag in the Central Valley.	It should be noted/stated in the CVFPP update that each of the Delta Legacy Communities are indeed Ag based communities, (like most small SCFRRP communities in the CVFPP planning area); and they need to have flood risk reduction measures implemented, as identified in their respective SCFRRP Feasibility Study Reports (and ultimately in the RFMPs), to help sustain long-term viability of Ag in the Delta and the Greater Central Valley planning areas.	The CVFPP notes in several places that many of the communities in the Central Valley are agricultural-based communities and the long-term viability of agricultural is a priority in those regions. The CVFPP does not include agricultural sustainability as a plan goal, but DWR will continue to work with the RFMPs in future updates of the CVFPP to reflect regional priorities related to it.	Yes.
181	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Funding Policy Issue	Please note the Delta Legacy communities in Sac County are very vulnerable to deep flooding (as documented in the 2012 CVFPP technical appendices), thus there should be added priority to reducing flood risks to the noted communities in comparison to others with similar populations	Add additional discussion regarding deep flooding risks in the Delta compared to other areas protected by SPFC levees	DWR recognizes the risk of deep flooding in the Delta Legacy communities, and in other areas of the Central Valley. The CVFPP will consider how regional overviews may be expanded in future updates to include more region-specific flood risk details and related potential RFMP updates to inform Update 2027.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
182	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Table 2.5	Please note that all Sac County Delta Legacy Communities (with the exception of the City of Isleton) are in the Primary Zone of the Delta. The Primary Zone of the Delta contains very strict land use constraints that will not allow any significant development to occur beyond its current developed limits. Thus, flood risk reduction improvements will not induce uncontrolled development within in or adjoining in the Delta Legacy Communities, of which all are ag-based.	Some statements in the Lower Sac - Delta North RFMP section should include some discussion relative to the Delta Plan restrictions in the Primary Zone of the Delta. With these restriction already in-place, implementation of structural-based flood risk reduction measures will not result in subsequent growth in the noted vulnerable Delta Legacy Communities.	Table 2.5 is a crosswalk of Water Resilience Portfolio Actions and the actions under Maintain and Diversify Water Supply are primarily related to land use changes in response to SGMA, primarily related to changes on agricultural lands to reduce water demand (such as cropping decisions). It is unclear where and how the requested change should be made to the document. The current regional overviews focus on accomplishments since 2017, regional challenges, and regional priorities. The CVFPP will work with the RFMPs to consider how the regional overviews can be expanded in future updates.	No.
183	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Table 2.5	Climate Change vulnerability is a large element of concern to the vulnerable, disadvantaged Delta Legacy Communities relative to Sea Level Rise (SLR) and increased flows from the east side streams of Morrison Creek, the Cosumnes River, Mokelumne River and Dry Creek.	Please include, copy the Delta Legacy Communities in connection with advancing all planning actions in connection with "Building Connections" in the Delta ; including, but not limited to the Delta Adapts consistency determination that will take place with the DSC.	Table 2.5 focuses on State-to-State alignment. Including local and RFMP alignment with other State efforts could be included in future RFMP updates and summarized in future updates of the CVFPP.	No.
184	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Table 2.5	The City of Isleton, and possibly other neighboring Delta Legacy Communities, are launching the Delta Region GHAD that will be promoting and including a Community- Based Flood Insurance Program	Some mention of the progress of a Community-Based Flood Insurance program should be made in the current CVFPP Update, and it is hopeful that it can be expanded to areas beyond the Delta region and possibly beyond the CVFPP planning area.	Added City of Isleton as an example of a community considering a community-based flood insurance program to Table 2.4 instead of Table 2.5 as requested in the comment.	Yes.
185	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Table 2.5	As previously noted, little RFMP coordination has taken place until recently with the Delta Legacy Communities located behind SPFC levees in Sac County and Isleton. One of the key common structural-based management action items identified by the subject Delta Legacy Communities includes the multi-benefit objective of improving the existing SPFC levee systems in the Lower Sac River Corridor also serves to improve the reliability and resiliency of conveying State Water Project (SWP) and Central Valley Project (CVP) water through the Delta, particularly upstream of and near the Delta Cross Channel.	Consider formal development of a Lower Sacramento River - Delta North Corridor Management Plan to coordinate and advance multi-benefit opportunities. This should be mentioned and included in the CVFPP update as potential future actions in the Lower Sac-Delta North RFMP.	As funding and resources are available, DWR will work with the RFMP and Delta Legacy Communities to expand and update content in the RFMPs and regional overviews to better inform future updates.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
186	Jeff Twitchell, Dan Whaley	Delta Legacy Communities	Table C.6	Consider development of Corridor Management Plan (CMP) for Delta-North-Lower Sacramento River Corridor to address multi-objectives, including water conveyance through the Delta, ecosystem enhancements in the noted Sac River Corridor as well as recreational enhancements associated with developing and implementing components of the Great California Delta Trail identified in the DPC's Great California Delta Trail Master Plan.	Consider formal development of a Lower Sacramento River - Delta North Corridor Management Plan to coordinate and advance multi-benefit opportunities. This should be mentioned and included in the CVFPP update as potential future actions in the Lower Sac-Delta North RFMP.	As funding and resources are available, DWR will work with the RFMP and Delta Legacy Communities to expand and update content in the RFMPs and regional overviews to better inform future updates.	No.
187	Matt Conover	General Public - John McCormack Company	Not Applicable	Chapter 7 Title typo, pg. 7-1, "Food Control." Page 173 of 222 in my Microsoft Edge browser on wide screen setting. BTW, the Search icon in this browser, or your indexing method, did not respond to either "Cosumnes," or "Cosumnes River," nor any page numbers alone.	None.	Revised "food" to "flood" as requested.	Yes.
188	Justin Fredrickson	Farm Bureau	Overall Document	<p>2022 CVFPP Update was necessarily cursory. Accordingly, these brief public comments are limited, and merely intended as a brief overview of some thematic impressions on the Draft document, from my perspective as staff at the California Farm Bureau, employed over the last many years on matters including CVFPP updates and Central Valley flood management issues generally.</p> <p>Generally speaking, the document, like past Updates, is a good informational resource. I have not had time to look any of the Appendices to the Draft, but plan to look them over hereafter. I also think the document does a good job highlighting and summarizing most of the important issues and strategic goals in terms of long-term system management--including, notably, climate change adaptation and risk management, and integration with other state priorities programs, including SGMA and the WRP. The document's Flood-MAR connections are important and positive. At the same time, I see some areas of concern, as briefly summarized below.</p>	None.	Thank you. Comment noted.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
189	Justin Fredrickson	Farm Bureau	Overall Document	Of particular note, projections of potential climate risk, including potential annual economic damages, while good information, I feel, need much more urgent policy communication to avoid growing risks of foreseeable disaster(s) in coming years. A visually-oriented compilation of 'Highlights' for policy audiences, including the California Legislature and Governor's Office, similar to the Water Plan's Highlights documents, could potentially help here. In addition, I feel much more effort needs to be put in to education of both policy makers and the public at large, concerning the urgency of the challenges our state faces in the flood realm--and how these challenges overlap in important ways, and also include important potential synergies in terms the economy and social fabric and many existing policies. Related to this theme, the document's funding need and progress assessments to date highlight major shortfalls, and a continued lack of urgency and commensurate prioritization from state government as a whole.	None.	The 2022 CVFPP Update includes a Highlights document and "Call to Action" that were not included with the release of the Public Draft. These components stress urgency and significant impacts of climate change.	Yes.
190	Justin Fredrickson	Farm Bureau	Overall Document	There is also a large, concerning, and wholly unresolved disconnect in the area of funding for rural versus urban flood system. As summarized in the Draft, for example, the condition of rural levees system-wide is abysmal, while rural areas lack financial capacity to bring these system up to a safe condition. Making matters worse, state policies in other areas appear posed to result in large retirements of existing farmland and farm production, thus further depressing long-term rural capacity to invest in the system (something perhaps not sufficiently anticipated and accounted for in the Draft Plan's projections). This is true system-wide, but particularly on the San Joaquin side, where a confluence of factors point to major growing risks (many climate-driven), paired with the problem of extremely limited capacity to deal with the same.	None.	DWR is currently taking steps to increase the awareness of this issue and provide resources for flood risk management in underserved communities, and the CVFPP recognizes that more work remains to be done to serve rural and underserved communities considering local capacity limitations.	No.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
191	Justin Fredrickson	Farm Bureau	Overall Document	Funding goals, including proposed local contributions, are problematic and troubling when compared to actual performance to date. Also of note, while there has been lots of technical analysis and planning, it's clear there has been a corresponding lack of actual action on the ground. This leaves the system as a whole falling further and further behind, with no convincing solution in sight.	None.	The total CVFPP investment increase was heavily influenced by the priorities recommended by the Regional Flood Management Planning efforts. To achieve the flood risk reduction goals and societal values articulated in the CVFPP over the next 30 years, much larger contributions are required from all cost-sharing partners. The target cost-shares provided are programmatic goals and not prescriptive decisions for specific projects. It is recognized that many local communities can't comply with the cost-share requirements for some flood management projects because of the magnitude of costs involved and institutional capacity limitations. To reflect this, the cost-share ranges in this 2022 CVFPP Update consider these financial and institutional capacity limitations. For example, local cost shares by disadvantaged communities have been identified as a barrier to participation in federal programs.	No.
192	Justin Fredrickson	Farm Bureau	Overall Document	Flood management remains a 'fiscal orphan' that is forgotten in non-flood years, unfortunately, just waiting for a disaster to one day shake the system awake. Oroville should have been this, perhaps--and yet we seem to have rapidly lulled ourselves back into a slumber of short memories. Reservoir, floodplain storage, free board and channel capacity, along with forecast-based ops and levee condition, are clear urgent needs--and, yet, the reality is that there has been little actual progress. This is not the fault of the Department or of the Flood Board per se, or of local flood managers; rather, I think it is a system failure and a cultural failure on a larger scale that the flood community has so far been unable to surmount. Part of the solution here, I think, is connection to other program and policy priorities, and to the interests, including water and eco and equity and climate adaptation-related objectives, where public perceptions more readily appear to grasp related social and economic consequences.	None.	Political will to provide funding is particularly challenging in drought years. DWR agrees that alignment with other efforts is critical to address this challenge and has made Alignment with Other State Efforts one of the three primary themes of this update as described in Section 1.3.3.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
193	John Cain	MSJR RFMP/River Partners	Overall Document	<p>The document neglects to properly describe and communicate the alarming conclusions of the climate change analysis completed for the 2022 Update. As a result, readers will underestimate the magnitude of the challenge of adapting the flood system, particularly in the San Joaquin Valley, to the increased floods that climate change will bring. No numbers are provided regarding the increased magnitude or frequency of flooding, and the graphics provided on loss of life and annual expected damages are poorly constructed.</p> <p>Figures 3.2 and 3.3 are particularly ineffective. It is not clear what is being shown on the maps since the shaded area for the with and without SSIA scenarios doesn't seem to change materially between the two scenarios. Furthermore, the key factors – lives lost and expected annual damages – are presented as a number at the top and bottom of the map that most readers will probably not understand because of the poor graphic presentation. It would be more effective to use text or a bar chart to show how the numbers increase (i.e. 3 to 6 fold increase in expected annual damages for the San Joaquin Basin without SSIA).</p> <p>The state of California presumably spent significant amounts of money on the climate analysis for the CVFPP, but the draft CVFPP provides very little detail on the very important results. The draft should be modified to include graphics to show how much flood magnitudes will increase, and put those in the context of what the system is currently designed to convey. At least a few paragraphs should be added to describe the implications of these projections for the magnitude of smaller more frequent flood events, reservoir storage, floodway expansion, agricultural and habitat lands along floodways, and communities at risk. The results are very significant and must be presented in a manner that tax payers and their elected officials can understand and act upon.</p> <p>If adding additional text would require DWR to delete other text to maintain a concise report, we recommend that you cut all of section 2.4.2 which uses four paragraphs to describe what studies DWR plans to conduct. Instead, please report the results of studies you have already completed.</p>	None.	The 2022 CVFPP Update includes a Highlights document and "Call to Action" that were not included with the release of the Public Draft. These pieces stress urgency and significant impacts of climate change. Additional changes have been made throughout the document in response to this comment.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
194	John Cain	MSJR RFMP/River Partners	Overall Document	Please include the Western Monarch butterfly in the 2022 update to the Central Valley Flood Protection Plan Conservation Strategy. Both the impacts of flood system maintenance on Monarch habitat and the opportunity for multi-benefit flood system management to advance their recovery warrant inclusion of Monarch in the Conservation plan. River Partners previously asked for the Monarch to be included (see attached) and were under the impression that it would be, but we were disappointed that it is not included in the draft currently circulating for review.	None.	Revised as requested.	Yes.
195	Sarah Puckett and Amy Merrill	American Rivers	Page 1-1	It is unclear if the CVFPP looks at flood risk management for all of the Central Valley, or for just the levees protected by the SPFC. Pg 1.1 does not mention SPFC levees, but pg. 3-8 says the CVF Protection Act requires the CVFPP describe and prioritize structural and nonstructural actions to reduce flood risk in areas protected by the SPFC and pg. 4-2 says the CVFPP describes, estimates, and highlights the investments needed across the CV with a focus on the SPFC.	Clarify	The CVFPP is legislatively mandated to focus on areas protected by SPFC facilities. However, DWR recognizes the potential additional benefits that non-SPFC facilities and lands outside of the SPFC protected areas have to the system for flood risk reduction, ecosystem, and other water resources benefits. Therefore, the CVFPP also considers management actions that may be outside of areas protected by the SPFC but are within the larger Systemwide Planning Area. Future updates to the CVFPP may consider additional actions in the larger Systemwide Planning Area as well	No.
196	Sarah Puckett and Amy Merrill	American Rivers	Page 1-3	Socially vulnerable is not defined	Define socially vulnerable	Social vulnerability is included in the useful terms section of the 2022 CVFPP Update.	Yes.
197	Sarah Puckett and Amy Merrill	American Rivers	Page 1-5	Direct damages to Oroville Dam spillway were not mentioned (damages to flood system is mentioned at \$500M)	Include cost of direct damages to Oroville Dam spillway	Revised as requested.	Yes.
198	Sarah Puckett and Amy Merrill	American Rivers	Page 1-8	Are there other equity tools?	EPA Enviro Atlas	Thank you for sharing this information. This tool may be evaluated and considered to inform Update 2027.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
199	Sarah Puckett and Amy Merrill	American Rivers	Page 1-9 and 1-10	There is not enough emphasis on severity of flood risk from climate change, especially in low frequency events. The climate change models were not based on the most up to date climate science.	Emphasize severity of climate change in body of document	The CVFPP Update went through an internal procedure to determine the most appropriate approach to represent climate change in the 2022 Update. This procedure takes into account 8-analytical considerations. These include the purpose of the activity, the decision resulting from the activity, climate-sensitivity parameters, spatial scale/watershed area, infrastructure/systems and operational activities, legal and institutional issues, stakeholders and their interests, and continuity with previous work/studies. Since no significant hydrologic, reservoir, hydraulic and economic models were updated and the 6th Assessment Report from the Intergovernmental Panel on Climate Change with the latest climate change projection was only released in early 2022, the intent of this plan was to depict the uncertainties regarding future flood risk conditions, which are all heading toward higher flood risk but with a broad range. The 2022 CVFPP update used the most up-to-date downscaling information, an improvement from the 2017 CVFPP update, and three climate change scenarios covering most of the uncertainties regarding flood risk under future climate change conditions.	Yes.
200	Sarah Puckett and Amy Merrill	American Rivers	Page 2-2	SGMA not SMGA	None.	Revised as requested.	Yes.
201	Sarah Puckett and Amy Merrill	American Rivers	Page 2-8	State number of acres restored for Oroville Wildlife Project and Dos Rios Project	for Oroville: approximately 500 acres of water primrose and approximately 200 acres of terrestrial invasive species.	Added number of acres restored for both the Oroville Wildlife Area Flood Stage Reduction Project and the Dos Rios Ranch Floodplain Expansion and Ecosystem Restoration Project, Phase 1.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
202	Sarah Puckett and Amy Merrill	American Rivers	Page 2-8	Edit Paradise Cut language from: "Funded through non-CVFPP State programs (planning grants from the Delta Conservancy), an initial phase of feasibility planning for Paradise Cut Bypass expansion has been completed by American Rivers and South Delta Water Agency."	To "Funded through non-CVFPP State programs (planning grants from the Delta Conservancy), an initial phase of feasibility planning for Paradise Cut Bypass expansion has been completed by San Joaquin County Resource Conservation District in partnership with American Rivers, South Delta Water Agency, San Joaquin Area Flood Control Agency, River Partners, San Joaquin County Flood Control and Water Conservation District, and City of Lathrop. The project is a prime example of the scale of system improvements necessary to protect lives and property in the San Joaquin River Basin under climate change, and of the diverse partnerships necessary to achieve those improvements."	Revised text to "Funded through non-CVFPP State programs (planning grants from the Delta Conservancy), an initial phase of feasibility planning for Paradise Cut Bypass expansion has been completed by the San Joaquin Resource Conservation District in partnership with American Rivers, South Delta Water Agency, San Joaquin Area Flood Control Agency, River Partners, San Joaquin County Flood Control and Water Conservation District, and City of Lathrop. Project partners consider the project to be a prime example of the scale of system improvements necessary to protect lives and property in the San Joaquin River Basin under climate change, and of the diverse partnership necessary to achieve those improvements."	Yes.
203	Sarah Puckett and Amy Merrill	American Rivers	Page 2-9	which will create tidal wetland habitat and increase flood capacity not increasing flood habitat.	None.	Changed "increasing" to "increase" as requested.	Yes.
204	Sarah Puckett and Amy Merrill	American Rivers	Page 2-14	of the not "the of"	None.	Changed "the of" to "of the" as requested.	Yes.
205	Sarah Puckett and Amy Merrill	American Rivers	Page 2-14	name river or creek associated with Knights Landing Levee Repair Project	Indicate Sacramento River for the general reader	Revised as requested.	Yes.
206	Sarah Puckett and Amy Merrill	American Rivers	Page 2-15	Community actions not "communities actions"	None.	Changed "communities" to "community" as requested.	Yes.
207	Sarah Puckett and Amy Merrill	American Rivers	Page 2-14 and 2-15	Small communities and rural areas are not defined	Define small communities vs rural communities. Indicate if this is according to federal or other rule.	"Small communities" and "Rural areas" added to list of useful terms.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
208	Sarah Puckett and Amy Merrill	American Rivers	Page 2-22	Provide more specifics on "hydraulic modeling" used to evaluate channel conveyance. Which model? This could be a "project highlight"	State minimum resolution and version of HEC-RAS	Revised as requested. Added "The characterization of a channel's current conveyance capacity is derived from a hydraulic investigation that includes development of a one-dimensional USACE Hydrologic Engineering Center-River Analysis System (HEC-RAS) hydraulic model. The DWR Central Valley Floodplain Evaluation and Delineation (CVFED) Program provided the primary source of SPFC channel conveyance capacity data. DWR regularly gathers updated topographic, hydrologic, and hydraulic data, to develop updated mathematical models to understand flood risk and evaluate channel conveyance capacity in the Central Valley on a systemwide level as part of 5-year updates to the CVFPP. DWR's Flood System Operations and Maintenance Program conducts project-specific modeling that provides a second source of channel conveyance capacity data in the Sacramento River watershed."	Yes.
209	Sarah Puckett and Amy Merrill	American Rivers	Page 2-23	DWR funded the regional flood management groups in 2012, many of which developed plans in 2014. However, most of the RFMP's have not been updated since and it is unclear how the RFMP's are providing valuable perspective if they aren't all up and running and don't have updated plans. It does not appear that all RFMP's currently include representatives from environmental groups.	Include website or contact information or lead agency for each of the RFMP in the Regional Overview. Tribes and representatives from local communities should be included in future.	As the RFMPs are scoped to support the next 5-year update in 2027, participation in each RFMP may be revisited to see how broader participation or engagement may be achieved. While the regional plans have not been formally updated since the first plans, valuable work, communication, and engagement has continued through updates to the investment portfolio submitted by the regions. Regional priorities white papers and regional overviews included in the 2022 CVFPP Update have also served as means to highlight updates from each region. RFMP websites are available in Useful Links and have been added to the regional overviews. Additional RFMP contact information (e.g., tribes and representatives from local communities) may be considered in future updates to the CVFPP.	Yes.
210	Sarah Puckett and Amy Merrill	American Rivers	Page 2-32	Policy and regulations row - no period between climate and change	None.	Revised as requested.	Yes.
211	Sarah Puckett and Amy Merrill	American Rivers	Page 2-39	Are the results of the DWR levee inspections public information?	If so, reference where to find DWR inspection information. If not, explain why.	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
212	Sarah Puckett and Amy Merrill	American Rivers	Page 2-44	FEMA BRIC program has very difficult cost share requirements.	In third bullet under "areas for continuing coordination" add: "Identify and work through potential barriers of cost share and other issues that limit funding potential."	Revised as requested.	Yes.
213	Sarah Puckett and Amy Merrill	American Rivers	Page 2-51	socially vulnerable communities instead of just "vulnerable" communities.	Be consistent with language throughout	Deleted "vulnerable populations in" as the bullet is intended to compare spending in urban areas versus rural areas and small communities. The bullet was not intended to call out socially vulnerable areas specifically.	Yes.
214	Sarah Puckett and Amy Merrill	American Rivers	Page 2-53	Diversity, equity and inclusion is not mentioned	Mention diversity, equity and inclusion to align with other state efforts	Chapter 2 describes efforts that occurred from approximately 2016 to end of 2021. Unfortunately, there were not dedicated efforts during this time to better align equity-related activities with other State agencies. This is anticipated to be further addressed and described in Update 2027, depending upon available resources.	No.
215	Sarah Puckett and Amy Merrill	American Rivers	Page R-2	Great Valley Grasslands Floodplain Restoration Project. Encroachment Permit 19513 was recently approved by the CVFPB. Prop 1 grant funding was received to advance the project.	Revise to "Great Valley Grasslands Floodplain Restoration Project. American Rivers and California Department of Parks and Recreation's Encroachment Permit 19513 was recently approved by the CVFPB to breach a SPFC levee and reconnect the San Joaquin River to its historical floodplain. The project demonstrates the opportunity provided by strategic breaches of SPFC levees to achieve flood risk reduction, ecosystem, and water supply benefits. The project was developed through multiple phases of California Department of Fish and Wildlife Watershed Restoration Grant Program Prop 1 grant funding."	Revised as requested.	Yes.
216	Sarah Puckett and Amy Merrill	American Rivers	Page 3-20	Edit Paradise Cut language from "For example, refinements for Paradise Cut multi-benefit improvements in the San Joaquin River Basin have been advanced through partnership with the San Joaquin County Resource Conservation District, American Rivers (an environmental NGO), and others to further evaluate and expand on the work completed in the San Joaquin Basin-Wide Feasibility Study and 2017 CVFPP Update."	To "For example, refinements for Paradise Cut multi-benefit improvements in the San Joaquin River Basin have been advanced through partnership with the San Joaquin County Resource Conservation District, American Rivers (an environmental NGO), South Delta Water Agency, San Joaquin Area Flood Control Agency, and others to further evaluate and expand on the work completed in the San Joaquin Basin-Wide Feasibility Study and 2017 CVFPP Update."	Revised as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
217	Sarah Puckett and Amy Merrill	American Rivers	Page 3-28	appurtenant?	None.	Deleted "appurtenant"	Yes.
218	Sarah Puckett and Amy Merrill	American Rivers	Policy Rec. 6	No mention of how FEMA BRIC cost share is difficult	Add bullet: "Identify and work through potential barriers of cost share and other issues that limit funding potential from FEMA BRIC for multi-benefit projects."	Revised as requested.	Yes.
219	Sarah Puckett and Amy Merrill	American Rivers	Policy Rec. 8	NGO's are not a part of all RFMP's	Add "Increase involvement and engagement of NGO's" and "increase involvement and engagement of local populations"	Revised similar to requested.	Yes.
220	Sarah Puckett and Amy Merrill	American Rivers	Policy Rec. 11	Include "and implementation and monitoring"	Progress equity and EJ in flood management planning, design, decision-making, IMPLEMENTATION AND MONITORING (State/federal/local/Tribes)	Revised as requested.	Yes.
221	Sarah Puckett and Amy Merrill	American Rivers	Policy Rec. 11	NGO's are missing in this sentence: "Work collaboratively with State and federal partners to develop strategies to include social vulnerability..."	Include NGO's. Change to "Work collaboratively with State, federal, AND NGO partners to develop strategies to include social vulnerability..."	Revised similar to requested.	Yes.
222	Sarah Puckett and Amy Merrill	American Rivers	Table 3.7	Add indicator for "provide greater amount of recreational benefits"	Add "safe river access"	Revised as requested. Added "and river" to access indicator.	Yes.
223	Sarah Puckett and Amy Merrill	American Rivers	Table 3.7	make sure people can actually access recreational areas	Amount of recreational area and " Amount of recreational area OPEN TO PUBLIC"	Revised as requested. Added "open to the public" to the indicator.	Yes.
224	Sarah Puckett and Amy Merrill	American Rivers	Page 3-53	Use socially vulnerable not just vulnerable	Use socially vulnerable not just vulnerable	Revised as requested.	Yes.
225	Sarah Puckett and Amy Merrill	American Rivers	Table 3.8	Use socially vulnerable not just vulnerable	Use socially vulnerable not just vulnerable	Revised as requested.	Yes.
226	Sarah Puckett and Amy Merrill	American Rivers	Table 4.2	The San Joaquin has significantly less money in capital investments than Sacramento. Why is there 10 times more money for multi-benefit flood improvement programs in Sacramento than San Joaquin, especially when the annual lives lost is more than double in the SJ than the Sacramento, and has significantly larger projected economic damages?	The CVFPP needs to make capital investments for these regions more equal. Additional money is greatly needed to fund multi-benefit projects in the San Joaquin, especially in the metropolitan area of Stockton, which is projected to have massive damage due to flooding. The San Joaquin region should receive far more funding to address their needs, regardless if the San Joaquin Basin has been able to articulate these needs.	Investment needs are calculated using information provided by RFMPs and other project proponents, as known. Many projects in the Sacramento basin are further developed and have more detail at this time. It is expected the San Joaquin need will increase as the system needs are more fully understood and more projects are formulated and cost estimates are developed.	No.



ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
227	Sarah Puckett and Amy Merrill	American Rivers	Page 4-24	Flood bypasses are not specifically mentioned in systemwide investments	add flood bypass here: "Large systemwide projects (such as reservoir modifications, levee setbacks, FLOOD BYPASSES, and weir expansions"	Revised as requested.	Yes.
228	Morgan Chow	Delta Stewardship Council	Page 2-30, 2-55, 2-60, and 2-61	Thank you for mentioning Delta Adapts and coordination with DWR for the data on flood risk and for the shared goals between the Delta Plan and the CVFPP to support ecosystems and reduce flood risk, particularly in Chapter 7 and 4 of the Delta Plan.	None.	Thank you. Comment noted.	No.
229	Morgan Chow	Delta Stewardship Council	Page 3-53	We are interested in knowing what communities will be targeted for better integrating their perspectives into decisions to improve equity and social justice outcomes. Additionally, we suggest that staff follow the development of our Delta Adapts equity-focused metrics as the CVFPP continues to develop metrics for measuring progress.	Coordinate with Delta Adapts on metrics development related to equity.	DWR staff will coordinate with DSC staff as a methodology to identify the most vulnerable communities and outreach strategies are considered.	No.
230	Erin Mullin	Delta Stewardship Council	Page 2-22	Consider including what design elevation you are referring to. Is the State's adopted 200-year standard? The 57 Profile? It's not clear.	Include an explanation of what the design water surface elevation is.	Revised as requested. Added "Inadequacies in a channel's conveyance capacity are determined based on design flows and stages described in the 1957 USACE Levee and Channel Profiles, File Number (No.) 50-10-334 (1957 Design Profile) (U.S. Army Corps of Engineers 1957). For channels not covered in the Sacramento River watershed by the 1957 Design Profile and those in the San Joaquin River watershed, the as-constructed plans were used to determine the design stage."	Yes.
231	Erin Mullin	Delta Stewardship Council	Page 4-21	We are encouraged that disadvantaged communities and their ability to generate revenue has been identified as a barrier to participate in Federal programs. We look forward to learning more about how the Department intends to address this issue.	None.	Thank you. Comment noted.	No.
232	Erin Mullin	Delta Stewardship Council	Chapter 3	This is a general comment on the risk chapter. Consider including a discussion of the risk of losing federal dollars if RDs are not in compliance or have a SWIF with the Army Corps for levee O&M.	None.	Revised as requested. Added paragraph on PL 84-99 Program to Section 3.2.2.	Yes.
233	Annie Merritt	Delta Stewardship Council	Page 1-8 and 2-52	Thank you for mentioning the Delta Adapts social vulnerability index as an example of a tool to assess social vulnerability. We are interested to see how future updates of the CVFPP will assess social vulnerability and flood risk in the Central Valley.	None.	Thank you. Comment noted.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
234	Dan Constable	Delta Stewardship Council	Page 2-51	We support the attention focused on climate change and flood system resilience, including using the decision-scaling approach. We are currently preparing a flood adaptation strategy for the Delta, based on 1D modeling and future climate change scenarios. The Council can share this data if of interest, and welcomes any opportunities to coordinate with or learn from CVFPP updates in this area.	None.	DWR will continue to coordinate with the DSC to learn about new efforts.	No.
235	Dan Constable	Delta Stewardship Council	Page 2-47	We appreciate the focus on multi-benefit projects. Council staff participated in the Conservation Strategy update and support continued implementation of the objectives identified therein. However, as part of this process, we note that there was substantial conversation about defining what constitutes a "multi-benefit project", e.g. the proportion of funding, acreage, function, or other project factors. The Council's ongoing amendment to Chapter 4 of the Delta Plan includes reporting/guidance on restoration 'tiers', which could help inform aspects of this definition. We encourage you to review this material and consult with Council staff for more information.	None.	The 2017 CVFPP Update and CS included a definition for multi-benefit projects but recognize that this could be different for other programs. DWR will review Chapter 4 of the Delta Plan and will follow-up with any questions and look forward to future collaboration. No changes were made to the CS or CVFPP for this update in response to this comment.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
236	Eric Johnson	General Public	Overall Document	<p>Congratulations on a very comprehensive draft plan. The issue is so huge and has so much impact on California; I'm amazed you were able to keep it under 300 pages!</p> <p>I serve on the boards of a couple bird-focused organizations, and although this note is not in my official capacity as a board member, the multiple mentions of flood areas as important bird habitat were key. Thank you for including those, especially the specific callouts to the Tricolored Blackbird and Yellow-breasted Chat. That's the kind of thing that really brings the needs home to people.</p> <p>In the final plan, it would be beneficial to talk a bit more about encroachments and the threat they may pose to levee integrity. In Sacramento's Big and Little Pockets, there are many historical encroachments ranging from steps to lighting to docks and fences. I understand that there are legal issues with entitlements and the like; nonetheless, the final draft should incorporate language talking about the importance of maintaining the floodway, as many of the privately-installed fences reach far below the Ordinary High Water mark on the river side of the levee, and could be hazardous if enough debris piles up. Additionally, these fences prevent access to the public of a valuable outdoor recreational resource. Levees on the American River that back up to houses are free and open; these others should be free and open also.</p> <p>Thanks for your Herculean effort to bring this plan to fruition--it will have long-lasting consequences for the Central Valley and California as a whole.</p>	None.	The OMRR&R investment need includes inspection and repair of encroachments. Additionally, the portfolio includes the CVFPB operational costs (CVFPB is responsible for enforcement of encroachments).	No.
237	John Cain	MSJR RFMP/River Partners	Page 2-27	First sentence of first paragraph in section incorrectly implies uncertainty about the fact that peak floods will get larger	Rewrite first sentence to read "Extensive new climate and hydrologic analysis confirms that peak flood magnitudes will increase dramatically. The paragraph should then go on to say how much peak flows will increase in both the San Joaquin and Sacramento Basins at Vernalis and Rio-Vista respectively. We suggest a table showing high, median, and low projections for climate change compared to existing or, better yet, design flow.	Several changes were made to the document in response to this comment to illustrate the potential changes to Central Valley hydrology due to climate change.	Yes.
238	John Cain	MSJR RFMP/River Partners	Page 2-27	Second sentence is not particularly germane to the flooding or hydrology and is simply not necessary if you rewrite first paragraph as suggested in comment 1 above. If this section was titled climate change or instead of hydrology, the sentence would be more relevant.	Cut sentence and add new sentences related to new topic sentence. For example, "Peak flows will increase 1.5 to 5 fold in the San Joaquin and XX to XX in the Sacramento.	Subject sentence deleted as requested.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
239	John Cain	MSJR RFMP/River Partners	Page 2-27	The first sentence incorrectly implies there is uncertainty. Is there any uncertainty that peak flows will get larger, particularly in the San Joaquin. Are there any studies suggesting peak flows will get smaller? Table 2.4 states that there is "very high certainty" that it will get warmer, that more precipitation will fall as rain, and that peak flows will increase.	This sentence is problematic and should be rewritten just to explain the new climate change analysis that was done to validate or disprove the 2017 projections. If you do decide to use the word "uncertainty", better define the uncertainty. Clarify that there is strong evidence that peak flows will get large, but like all predictions fifty years into the future, there is uncertainty regarding the potential magnitude of peak flow increases.	Revised Section 2.4.1 as requested.	Yes.
240	John Cain	MSJR RFMP/River Partners	Table 2.3	Unregulated flood volume estimate incorrect. While the Climate analysis performed for the 2017 plan predicted a 2 fold increase in peak flows for the San Joaquin, the median projection under the new climate change analysis is for a 3 fold increase - and a range of 1.5 to 5 fold.	Correct the values.	The example impact of climate change on unregulated flows has been deleted from the table and moved into the text. No other trend in the table included examples.	Yes.
241	John Cain	MSJR RFMP/River Partners	Figure 2.4	Too vague and potentially incorrect. For example, will only regulated flow increase. Was the spill over the Orville spillway "regulated?" Why are so many of the hydrologic changes qualified by the word "regulated?"	None.	"Regulated flows" is used when flows are influenced by upstream infrastructure like weirs and dams and quantified flows reflect these infrastructure operations. "Unregulated flows" is used when flow is not interrupted by dams and weirs and the volume of water is based entirely of rainfall, runoff, or snowmelt. However, "unregulated flow" may also be used when referencing a flow event that cannot be retained or controlled by instream infrastructure.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
242	John Cain	MSJR RFMP/River Partners	Page 2-24 and 2-25	The last sentence of the page 2-24 promises key findings, but we only get four confusing and problematic bullet points on page 2-25 - no numbers, no graphs, no interpretation. What does bullet 1 mean and why is it a key finding that projections or increased warming are consistent for the entire region? Why is this key and worthy of a bullet point? Bullet three is confusing and implies that flood magnitude increases will be "caused by a reduction in precipitation falling as snow and more rapid snowpack melting." The increased peaks won't come from a "reduction in precipitation falling as snow, " rather they will come from precipitation occurring as rain instead of snow at high elevations, resulting in immediate runoff instead of storage as snow pack. This is a very clear mechanism, but it is hard to clearly explain.	It is really important to explain the logic of these four bullet points. They are not really the "findings" of the study but the mechanisms that drive the findings. Helping the reader understand the mechanism will really help people accept these extraordinary projections. Thus, you may want to list some of the key findings (i.e. a 1.5 to 5 fold increase in peak flows on the San Joaquin, increase in 5 and 10 year events as well as 100 year event, etc.) and then follow it up with some iteration of the four bullets that with some careful edits can clearly communicate following key points: 1) Under all scenarios the climate warms resulting in more precipitation falling as rain rather than snow, 2) Under all scenarios, even a drier climate, extreme precipitation events are expected to increase (please explain why and provide evidence), 3) Upper watershed areas that have historically been subjected to snowfall during winter precipitation events will now be increasingly subjected to rain, which unlike snow, will run off rapidly. Moreover, these upper watershed areas are generally rockier and steep resulting in disproportionately high ratios of precipitation to run-off (less infiltration) and increased travel time. This phenomena is comparable to increasing the size of the catchment area subject to runoff events (rain) but instead of just adding area that is similar to lower watershed forests, we are adding steep rocky terrain with very little capacity to infiltrate or detain runoff.	Revised bulleted list for clarity as requested.	Yes.
243	John Cain	MSJR RFMP/River Partners	Page 2-28	Why are you using so much real estate to talk about the methodology of future studies - studies that are more relevant to water supply planning than flood management. The last paragraph explains that the 2022 Climate analysis, which is already done, uses a similar methodology as these future studies, but doesn't really explain.	Instead, start the section by explaining the methodology for the 2022 climate analysis, spend the bulk of the section explaining the methodology and why it is better than the 2017 Climate analysis, and then perhaps spend a paragraph telling the leader about the future studies/refinements that will be available to inform the 2027 plan.	Section 2.4.2 describes pilot studies in the San Joaquin Valley that have been conducted since the 2017 Update to further advance and improve climate change analyses in the CVFPP planning area. DWR describes the work as part of informing the CVFPP and worth noting as accomplishments. A reference to the Technical Analyses Summary Report has been added to Section 2.4 so readers know where to go for greater detail on the climate change analysis methodology.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
244	John Cain	MSJR RFMP/River Partners	Page 2-30	This section reports that the climate analysis evaluated reservoir vulnerability, but doesn't really tell us anything new. It doesn't even tell us if our reservoirs are vulnerable. It ends with a number of generic suggestions about decreasing risk above the reservoirs, at the reservoirs, or downstream. Please tell us how vulnerable the reservoir system is. How often did the reservoirs spill uncontrollably over the auxiliary spillways?	Please, provide a report on how vulnerable the reservoirs are. Provide a graphic similar to the graphic in the 2016 San Joaquin Basin Feasibility Study that shows the volume of reservoirs relative to the volume of peak flows for both the base case and the median climate projection.	Clarified description of the work completed for the reservoir vulnerability analysis, some of the changes requested by comment would come from work still to be completed. Added graphic from 2017 San Joaquin BWFS as requested.	Yes.
245	John Cain	MSJR RFMP/River Partners	Page 2-30	This section reports that the 2022 analysis used a significantly higher sea level projection for then the 2017 analysis, but then reports that this projection is very conservative and unlikely to occur so the 2022 analysis evaluated a wide range of sea level projections presumably to find out how sensitive their stage projections for the Plan of Flood Control are to sea level rise.	Please provide some detail about how sensitive the findings of the new climate change study are to the sea level rise assumptions. Do estimates of flood damage vary widely for different sea level assumptions? Or are the findings relatively insensitive to the sea level rise assumptions?	Added text describing how water surface elevations in the Delta, especially in the Systemwide Planning Area that are more on the Delta exterior, are more influenced by climate change hydrology rather than sea level rise.	Yes.
246	John Cain	MSJR RFMP/River Partners	Page 2-3	The so called key findings are general and obvious. It really looks like somebody was too lazy to actually explain the key findings	Please provide more information and detail about the key findings. Please put some effort into this.	Added text describing how water surface elevations in the Delta, especially in the Systemwide Planning Area that are more on the Delta exterior, are more influenced by climate change hydrology rather than sea level rise.	Yes.
247	John Cain	MSJR RFMP/River Partners	Table 2.2	How does this table relate to the SSIA? Are these actions being recommended for inclusion in the 2022 CVFPP?	Clarify how the actions in Table 2.2 relate to the SSIA. Explain how the actions in Table 2.2 will be evaluated or whether they have already been evaluated. Identify the next step? Clarify the purpose of this table?	Climate change adaptation types and actions are aligned with the SSIA management action types and actions. Table 2.2 is intended to provide an overview of potential adaptation measures and strategies that can enhance flood system resilience under the impacts of climate change. Added "The climate change adaption action types identified in Table 2.2 are included in the SSIA. Refinement of these actions and consideration and inclusion of new adaptation strategies and measures may be included in future updates of the CVFPP" to the section in response to comment.	Yes.
248	John Cain	MSJR RFMP/River Partners	Page 3-47	The concept of average annual damages or expected average annual life loss is never explained in the document. I doubt many people could accurately describe what it means. Also, why Table 3.4 and the text report that EAD and EA Life Loss were calculated, it doesn't reference the technical appendix where this is explained.	Please provide an explanation of what average annual life loos and average annual damages means? Describe how it is calculated and why it is used as a metric nationwide. Also, reference the technical appendix where EAD and EA life loss was calculated.	Added explanation of EAD and EALL and references to the Technical Analyses Summary Report.	Yes.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
249	John Cain	MSJR RFMP/River Partners	Figure 3.23	Not clear why flood damages are going up in the Sacramento Valley with SSIA while they are more level in the San Joaquin. Partly explained that benefits of early actions not included in the baseline, but I also expect that development in Natomas, West Sacramento, and elsewhere may be major factors	Benefits of the Early Implementation Program (EIP) are included in the baseline 2022 without-project condition although not explicitly estimated as was done for the 2017 CVFPP risk analysis. Future condition (2072) EAD and EALL are greater than the 2022 with-project condition in the Sacramento Basin for all climate change scenarios. While we are assuming increased level of protection for urban areas in the 2072 with-project condition, this basin also has a lot of rural housing and other non-ag land uses for which we didn't assume growth but damages and life loss will still be increasing due to climate change. Thus, the 2072 with-project condition EAD and EALL are greater than the 2022 without-project conditions. In contrast, we are seeing some future scenario EAD and EALL estimates in the San Joaquin Basin that are lower than the 2022 without-project conditions. For this basin, most of the non-ag land uses are concentrated within the Stockton region for which significant levee improvements are assumed for 2072. Thus, we are seeing greater benefits in the San Joaquin Basin than the Sacramento Basin.	The benefits of the Early Implementation Program (EIP) investments are included in the 2022 CVFPP risk analysis baseline (without SSIA project) condition, but retroactive results of those investments are not calculated for the 2017 CVFPP risk analysis. EAD and EALL continue to increase in the Sacramento Basin even with SSIA investment because of the effects of population growth and climate change. Population growth is different for the Sacramento Basin compared to the San Joaquin Basin because there are several urban areas for which the level of protection needs to be maintained, whereas in the San Joaquin Basin, there is primarily one major urban area (Stockton). There is currently a lot of focus with the USACE LSJRF projects and also the Mossdale Tract (RD17) project which is part of the planned investments remaining for the CVFPP.	No.
250	John Cain	MSJR RFMP/River Partners	Figure 3.24	The lengthy notes caveating/explaining the figure are repeated multiple times in the document every time a similar figure is shown. This is redundant and takes up a fair amount of space in the report.	Perhaps you should just have a short footnote that directs the reader to a section of the text that provides this information, and per comment #13, better explains the concept of expected average annual damages.	The DWR style guide for graphics requires that graphics stand alone and that notes and acronym definitions are included with each individual graphic.	No.
251	John Cain	MSJR RFMP/River Partners	Page 3-46	The table showing societal goals in the 2017 Update was very compelling, but no such summary table exists for this plan - partially because of all the progress you made defining other metrics so they don't all fit in one summary table. But something is lost not being able to show it all in one table with cool icons.	Make a societal goals/outcomes summary table similar to the 2017 Update to communicate to the reader the comprehensive nature of the performance tracking element. Perhaps repeat figure 1.3 used in the introduction or reference it.	As the performance tracking framework is implemented, future updates of the plan will include visuals that illustrate progress toward societal values and outcomes over time. This information is not available for this update.	No.

ID	Commenter	Affiliation	Location in Public Draft	Comment: Issue	Comment: Proposed Solution	DWR Response	Change in Document
252	John Cain	MSJR RFMP/River Partners	Page 3-55	Three issues: figure does not have a title, the figure/map is not an effective way to convey the information, and it is unclear why this information is presented in the equity and social justice section instead of the economic vitality section. The second issue is probably the biggest issue. What are you trying to show with the map? I don't think you need a map to illustrate this information. The stimulus will not be just in the blue area on the map, which may be part of the issue. It would be good for disadvantaged communities to benefit from the stimulus rather than wealthy consulting and engineering firms.	Consider using a line graph or some other graph to compare the regional economic stimulus over time of base case and SSIA.	This spotlight was intended to be in the healthy economy section and has been moved. Figures in the CVFPP spotlights are not numbered. The map is just a visual representation of the study area and analysis results in each basin.	Yes.
253	John Cain	MSJR RFMP/River Partners	Figure 2.4	graphic difficult to load on my computer. It doesn't load like a normal picture	Test on other computers and save in a different format if others have same problem that I have.	Updated how graphic was saved and imported into the document.	Yes.
254	John Cain	MSJR RFMP/River Partners	Page 2-27	The 50 year climate projection period referenced in the second sentence is unclear and perhaps incorrect as worded. As worded, it implies that the projected increases will occur during the period 2022-2072. I believe that the projection is for a theoretical 50 year period if the climate and hydrology conditions were held steady at the 2072 conditions. This is a really important issue to clarify and explain, not just in this section, but other sections that use the projections - such as the flood risk sections.	Explain what period the projections are for? I believe they are for 2072. I suspect the 50 year part of the explanation is irrelevant and just relates to the fact that 2072 is 50 years into the future.	Revised as requested.	Yes.
255	Tony Deus	RD 70 (MBK District Engineer) RD 1660 (MBK District Engineer)	Page 3-11	Provide upgrades or increase the interior drainage/pumping capacity within rural areas.	None.	Projects of this type would be included in the bullet for "Implementing a regional portfolio of projects" in Chapter 3. However, this change was made as requested to the MUSR Regional Overview.	Yes.

## Notes:

AFOTF = Agricultural Floodplain Ordinance Task Force  
 AFRP = Anadromous Fish Restoration Program  
 ALUC = Airport Land Use Commission  
 AR = atmospheric river  
 ARC = Atmospheric River Control  
 ARCF = American River Common Features  
 BRIC = Building Resilient and Infrastructure Communities  
 CA = California  
 Cal OES = California Governor's Office of Emergency Services  
 CCR = California Code of Regulations  
 CCVFC = California Central Valley Flood Control Association  
 CDFW = California Department of Fish and Wildlife

CEQA = California Environmental Quality Act  
 CFR = Code of Federal Regulations  
 CMP = corridor management plan  
 CS = Conservation Strategy  
 CVFED = Central Valley Flood Evaluation and Delineation  
 CVFPB = Central Valley Flood Protection Board  
 CVFPP = Central Valley Flood Protection Plan  
 CVHS = Central Valley Hydrology Study  
 CVP = Central Valley Project  
 CVPIA = Central Valley Project Improvement Act  
 CWC = California Water Code  
 CWP = California Water Plan

CY = cubic yard  
 DAC = disadvantaged community  
 Delta = Sacramento-San Joaquin Delta  
 DFM = Division of Flood Management  
 DPC = Delta Protection Commission  
 DSC = Delta Stewardship Council  
 DWR = California Department of Water Resources  
 EAD = expected annual damage  
 EALL = expected annual life loss  
 EIP = Early Implementation Program  
 EIR = Environmental Impact Report  
 EIS = Environmental Impact Statement



EJ = environmental justice  
 EPA = Environmental Protection Agency  
 ESRI = Environmental Systems Research Institute, Inc.  
 FAA = Federal Aviation Administration  
 F-CO = forecast-coordinated operation  
 FEMA = Federal Emergency Management Agency  
 FIRM = Flood Insurance Rate Map  
 FIRO = forecast-informed reservoir operation  
 Flood-MAR = floodwater used for managed aquifer recharge  
 FMO = Flood Maintenance and Operations Branch  
 FMPRA = Floodplain Management, Protection, and Risk Awareness  
 FR = Feather River  
 FSRP = Flood System Repair Program  
 FSSR = Flood System Status Report  
 FY = fiscal year  
 GHAD = Geologic Hazard Abatement Districts  
 GSP = groundwater sustainability plan  
 HEC-FDA = Hydrologic Engineering Center-Flood Damage Reduction Analysis  
 HEC-RAS = Hydrologic Engineering Center-River Analysis System  
 I = Interstate  
 IMPLAN = Impact Analysis for Planning  
 LAFCo = Local Agency Formation Commission  
 LMA = local maintaining agency  
 LOP = level of protection  
 LSDN = Lower Sacramento River-Delta North  
 LSJ/DS = Lower San Joaquin River-Delta South

LSJLD = Lower San Joaquin Levee District  
 LSJR = Lower San Joaquin River  
 LSJRDS = Lower San Joaquin River-Delta South  
 LSJRFS = Lower San Joaquin River Feasibility Study  
 LSJRP = Lower San Joaquin River Project  
 MA = maintenance area  
 MB = multi-benefit  
 MMRP = Mitigation Monitoring and Reporting Program  
 MSJR = Mid San Joaquin River  
 MUSR = Mid and Upper Sacramento River  
 NFIP = National Flood Insurance Program  
 NGO = nongovernmental organization  
 NOI = Notice of Interest  
 O&M = operations and maintenance  
 OMRR&R = operation, maintenance, repair, rehabilitation, and replacement  
 PD = Public Draft  
 PL = Public Law  
 PPA = Project Participation Agreement  
 Prop = Proposition  
 RASP = Resources and Agricultural Sustainability Plan  
 RD = reclamation district  
 Rec = recommendation  
 RFMP = regional flood management plan  
 RWG = Regional Working Group  
 SAFCA = Sacramento Area Flood Control Agency  
 SB = Senate Bill

SCFRR = Small Communities Flood Risk Reduction  
 SGMA = Sustainable Groundwater Management Act  
 SJAFCA = San Joaquin Area Flood Control Agency  
 SJR = San Joaquin River  
 SJRRP = San Joaquin River Restoration Program  
 SLR = sea level rise  
 SMA = State maintaining agency  
 SPFC = State Plan of Flood Control  
 SPRR = Southern Pacific Railroad  
 SSIA = State Systemwide Investment Approach  
 SWIF = systemwide improvement framework  
 SWP = State Water Project  
 TRLIA = Three Rivers Levee Improvement Authority  
 UFRR = Urban Flood Risk Reduction  
 ULDC = urban levee design criteria  
 ULOP = urban level of protection  
 USACE = U.S. Army Corps of Engineers  
 USBR = U.S. Bureau of Reclamation  
 USFWS = U.S. Fish and Wildlife Service  
 USJR = Upper San Joaquin River  
 WD = Working Draft  
 WPIC = Western Pacific Interceptor Canal  
 WRP = Water Resilience Portfolio  
 YWA = Yuba Water Agency