



DEPARTMENT OF THE ARMY
SOUTH PACIFIC DIVISION, U.S. ARMY CORPS OF ENGINEERS
1455 Market Street
San Francisco, California 94103-1399

Bill Edgar
President
Central Valley Flood Protection Board
3310 El Camino Avenue, Room 151
Sacramento, CA 95821

4 JUN '12

Dear Mr. Edgar,

This letter transmits the US Army Corps of Engineers (USACE) technical comments on the draft Central Valley Flood Protection Plan (CVFPP) (these comments have also been submitted electronically to the CVFPP). I commend California's leadership and thoughtful stakeholder involvement to develop the CVFPP.

We have a long history of collaboration between the Central Valley Flood Protection Board (CVFPB), the California Department of Water Resources (DWR), USACE and others to create and manage the flood management system in the Central Valley of California. A recent example is the California Levees Roundtable that focused on levee vegetation management, which developed California's Central Valley Flood System Improvement Framework, but it expires in July 2012.

Looking past the Framework, we understand the CVFPP is the State of California's comprehensive plan for reducing Central Valley flood risk. The CVFPP was an opportunity to explain California's strategy for eventual transition of levees into compliance with USACE levee standards. DWR's position in the CVFPP is that vegetation is not a levee deficiency meriting correction. However, this does not reflect national standards. In this case, USACE recommends the CVFPP provide a long-term vegetation management plan in accordance with USACE's System Wide Improvement Framework (SWIF) to ensure continued PL 84-99 eligibility for CVFPB levee systems.

I look forward to our continued work together to reduce the flood risk for the Central Valley of California through the use of the SWIF and/or request for vegetation variances.

Very Respectfully,

A handwritten signature in blue ink, appearing to read "Michael C. Wehr".

Michael C. Wehr
Brigadier General, US Army
Commanding

Building Strong From New Mexico All The Way To The Pacific!

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/Section	Page No.	Comment	Proposed Modification
258	Justin Fredrickson	California Farm Bureau Federation	jfredrickson@cfbf.com	DPEIR			See Letter	
259	Susan Schohr	Agriculture Stakeholder	ricencows@schohr.com	CVFPP			See Letter	
260	Bill Emlen	Solano County	rsmith@solanocounty.com	CVFPP			See Letter	
261	Artemio Pimentel	City of Woodland - Mayor	ana.gonzalez@cityofwoodland.org	CVFPP			See Letter	
262	Ron Erny		rerny@succeed.net	CVFPP/DPEIR			See Letter	
263	Jeff Moresco	Agriculture Stakeholder	aggiejeff@frontiernet.net	CVFPP			See Email	
264	Mario Consolacion	Contra Costa County Flood Control and Water Conservation District	mcons@pw.cccounty.us	CVFPP/DPEIR			See Letter	
265	Max sakato	Reclamation District 1500	xminusmax@yahoo.com	CVFPP			See Letter	
266	Roger Swanson	Wild Goose Club	swanson409@sbcglobal.net	CVFPP/DPEIR			See Letter	
267	Duplication of Index No. 226							
268	Jared J. Gross	Wilbur-Ellis Company	jgross@wilburellis.com	CVFPP			See Letter	
269	Jack W. Baber	Reclamation District 1004	rd1004@comcast.net	CVFPP			See Letter	
270	Robert Scheiber	Reclamation District 1001	asstrd@syix.com	CVFPP			See Letter	
271	Daniel Desmond	Butte County Rice Growers Association		CVFPP			See Letter	
272-01	USACE	USACE		2012 CVFPP Public Draft	General	N/A	When compared to existing conditions, improvements to upstream levees and/or increased upstream system capacity will likely increase the probability of flood flows being conveyed downstream. The CVFPP does not describe how increased downstream flood probability (relative to existing conditions), will be addressed on a system wide basis .	
272-02	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The term "attenuation" is misused in many locations to describe peak flow reduction from several different processes. Attenuation should refer to flood wave attenuation .	
272-03	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Recommend describing what Early Implementation Project (EIPs) are included in the without-project, with-project, conditions used for analysis. Without additional information, it is not clear what assumptions are being incorporated into the document .	
272-04	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Many places throughout the document describe USACE policy as requiring removal of all woody vegetation from levee slopes and toe areas. The document does not point out that a vegetation variance may be sought that may allow some woody vegetation to remain .	
272-05	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The term "vegetation variance" is used when referring to the August 3, 1949 HQ approval to modify the O&M manual to allow brush and small trees to be retained on the waterward slope... Recommend using the term deviation so it's not confused with the vegetation variance policy currently being used .	
272-06	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Document should discuss potential growth inducement associated with the State Systemwide Investment Approach .	Add text addressing potential growth inducement associated with the State Systemwide Investment Approach
272-07	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Document should discuss how levee superiority could be incorporated into the State Systemwide Investment Approach .	Add text discussing how levee superiority could be incorporated into the State Systemwide Investment Approach
272-08	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Document should address how information from the National Levee Database, developed by the U.S. Army Corps of Engineers is being utilized in the CVFPP.	Add text discussing National Levee Database.
272-09	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The CVFPP does not include consideration of endangered and threatened species. Recommend including language acknowledging that site-specific coordination with resource agencies may be required to address impacts to listed species.	
272-10	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The CVFPP does not include any processes to analyze the cumulative impacts of permitted and unpermitted encroachments on levees. Encroachments, whether unpermitted or permitted, may present some of the most significant flood risk impacts to public safety within the flood protection system. There are currently over 18,000 permitted encroachments in the system with requests for future permits coming to the CVFPB daily. The State's Plan should address the issue of encroachments in some detail.	
272-11	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The CVFPP states that assistance under PL 84-99 has not been cost effective as compared to the dollars spent on rehabilitation assistance in recent years. This analysis does not take into account the losses that could occur if the rehabilitation is not completed in a timely manner after flood events. The cost analysis should be revisited with consideration given to potential losses that may occur if rehabilitation work is not undertaken .	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-12	USACE	USACE		2012 CVFPP Public Draft	General	N/A	To address water resources challenges in California, including flood risk management, an examination of the system from above the rim reservoirs to the headwaters and downstream into the San Francisco Estuary will be required.	
272-13	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Instead of proposing to continue the interim standards for vegetation management, the CVFPP should address the proposed long-term approach to vegetation management as contemplated in the February 2009 Framework agreement. The Corps expected for the Central Valley Flood Protection Plan to update or provide the basis for creating a new Framework document to address continued extensions of eligibility under the RIP and Pub. L. No. 84-99 for California.	
272-14	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The CVFPP frequently refers to "USACE Feasibility Studies." All US Army Corps of Engineers feasibility studies are conducted with a non-Federal cost-sharing partner. The California Department of Water Resources and/or the Central Valley Flood Protection Board often, but not always, fill that role.	
272-15	USACE	USACE		2012 CVFPP Public Draft	General	N/A	There is no discussion within the CVFPP regarding the approach for encroachment enforcement. There have been widespread identification of unauthorized encroachments that are negatively impacting levee stability and a plan for moving forward is appropriate.	Recommend adding an encroachment section
272-16	USACE	USACE		2012 CVFPP Public Draft	General	N/A	There are many stream gages listed in the O&M manuals. For example, 1 street gage is required for operation of Sacramento Weir. Are these also part of the SPFC? If so, what is their status relative to standard operating procedures, data quality, completeness, etc?	
272-17	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The comparison of performance should describe the overall performance throughout the system, for a range of flood events. From a flood risk management perspective, the critical performance is the flood frequency at which flood damages are likely to occur and this varies throughout the system. Suggest describing the performance of each alternative by reach. For example, describe performance by the frequency of the flood that would exceed a reaches capacity. Reach capacity could be defined for, overtopping, freeboard encroachment, or 90% Conditional Non-Exceedance	
272-18	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Suggest differentiating flood risk between geotechnical performance and hydraulic/hydrologic capacity. The focus of Hydraulic/hydrologic capacity is the size of features (width of conveyance, height, etc) and overtopping related flood risk. The focus of geotechnical performance (fragility curves) is reliability.	
272-19	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Operations and maintenance cost are repeatedly described as "high" throughout the document. Recommend that specific thresholds or general ranges are defined for the use of general terms such as "low", "medium", and "high."	
272-20	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The term "chronic erosion" is used throughout the document without definition. The USACE does not understand how this term is being used as applied. Please include a definition.	
272-21	USACE	USACE		2012 CVFPP Public Draft	General	N/A	In several locations the document uses the term 100-yr storm when it should be 100-yr flood. The term storm event refers to the precipitation event. A flood event is the result of precipitation in combination with antecedent conditions (snow pack, infiltration, etc). In most cases used in this document, the term 100-yr storm should actually be 100-yr flood. See http://ga.water.usgs.gov/edu/qafloods.html for clarification.	
272-22							Comment Removed per request of Commentor	
272-23	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Because the CVFPP's goals are different for urban and non-urban areas, recommend providing maps describing urban and non-urban areas.	
272-24	USACE	USACE		2012 CVFPP Public Draft	General	N/A	Recommend providing maps describing residual floodplain risk for each approach within the CVFPP. Also include a description of the residual risk of each approach compared to FRM objectives for urban and non-urban areas.	
272-25	USACE	USACE		2012 CVFPP Public Draft	General	N/A	In order to relate inadequate conveyance capacity to other potential system hazards, it would be helpful to highlight the history of geotechnical instability and seepage induced (i.e. non-overtopping) failures in the system. This would provide a very meaningful context for understanding the relative risk of the overtopping hazard.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/Section	Page No.	Comment	Proposed Modification
272-26	USACE	USACE		2012 CVFPP Public Draft	General	N/A	The state has also started a Climate Change pilot study that will examine the sensitivity of climate change variables and reservoir inflow in the Feather-Yuba river system and in the Merced River system. The results of this study will not be available until the fall of 2013. The remaining reservoir locations in the Central Valley will be examined in FY 13 and FY14 resulting in a sense of the sensitivity of climate change to reservoir inflow and a possible shift in flow frequency at downstream locations. The threshold study and the preliminary pilot study correctly discern the possible effects that climate change will have on the Central Valley flood protection system. The Corps has no additional comment on the Climate Change attachment.	
272-27	USACE	USACE		2012 CVFPP Public Draft	1	Page 1-1	Potential for failure is described as "high" in the document. Recommend that specific thresholds and criteria are defined for the use of general terms such as "low", "medium", and "high".	
272-28	USACE	USACE		2012 CVFPP Public Draft	1/1.1	1-1	There is reason to question the Hydrology appendix, section 1.1, page 1-1, 3rd paragraph, "Hydrology from the Comprehensive Study is applicable for use in the 2012 CVFPP because no major flood has occurred in the Sacramento and San Joaquin river basins to modify the hydrology since development of the Comprehensive Study". The hydrologic flow frequency estimates can also change because of new methods of analysis. For instance the USGS "Regional Skew for California, and Flood Frequency for Selected Sites in the Sacramento-San Joaquin River Basin, Based on Data through Water Year 2006", Scientific Investigations Report 2010-5260, will influence the skew coefficients used in development of new flow frequency curves. The state has begun a study of the Central Valley to refine flow frequency curves which is not yet ready for the 2012 CVFPP report, however new methods of analysis and an additional 10+ years of record will certainly result in some changes to the hydrology of the Central Valley.	
272-29	USACE	USACE		2012 CVFPP Public Draft	1/	Page 1-3	Second sentence is incomplete. The sentence refers to five locations but describes the latitude of Chico.	
272-30	USACE	USACE		2012 CVFPP Public Draft	1/	Figure 1-3	Figure should note if these are regulated or unregulated flows (or both). Assuming it is both, the historical records shown in figure 1-3 can be misleading because they are based on non-uniform hydrologic conditions. The document notes that 3-day values are used, presumably to approximate a uniform record with reservoirs. Suggest noting on figure when upstream reservoirs were completed.	
272-31	USACE	USACE		2012 CVFPP Public Draft	1/	Page 1-6	Recommend the term "regulate flood flows" rather than "moderate flows"	
272-32	USACE	USACE		2012 CVFPP Public Draft	1/	Page 1-16	Recommend revising the following sentence. "In addition, as the moderating effects of snowpack on runoff decrease..." The word "moderating" does not seem to apply and the description of the issue is unclear. It is more clear in chapter 4, attachment 7 because of the information in the supporting paragraph.	
272-33	USACE	USACE		2012 CVFPP Public Draft	1/	Page 1-18	Another impact of concern is the potential transfer or increase in flood risk to other locations within the system. For example, increasing upstream capacity to convey a larger flood would reduce upstream overtopping and allow larger floods to be conveyed downstream.	
272-34	USACE	USACE		2012 CVFPP Public Draft	1/1.4.1	page 1-19	FEMA's ongoing flood risk mapping program is an effort to consolidate better information and knowledge of increasing flood risk. The notable current trend is the increased flood risk, not the mapping program.	
272-35	USACE	USACE		2012 CVFPP Public Draft	1/1.4.1	Page 1-19-20	The USACE project delivery process, including project formulation, design, and funding, are largely defined by Federal law and regulation. Those constraints affect the scope of responsibilities that the State, or any non-Federal sponsor, is able to assume.	
272-36	USACE	USACE		2012 CVFPP Public Draft	1/1.4.1	Page 1-19-20	Multipurpose projects have an evaluation process that does take into account the values of ecosystem restoration. The reason for the disparity between urban and rural projects is the difference in the economic value of urban residences and structures vs. agricultural crops - not environmental restoration.	Recommend revising text to accurately reflect Federal regulations with regard to integrating ecosystem restoration projects.
272-37	USACE	USACE		2012 CVFPP Public Draft	1/1.6	page 1-21	The CVFPP was not prepared in coordination with the USACE. The USACE did not participate in the composition of the draft CVFPP or the analysis of the supporting data. The USACE is therefore not in a position to determine whether the CVFPP is a defensible document from the perspective of the federal government. Ultimately, in order to make that determination, the various elements of the CVFPP will need to be evaluated through the USACE project planning process. The USACE has provided comments on the CVFPP through the public commenting procedures. USACE comments provided are not exhaustive and should not be read to be an endorsement or support of the CVFPP as a whole.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-38	USACE	USACE		2012 CVFPP Public Draft	1/Box Inset: Coordination with other programs and projects	page 1-29	It is USACE's understanding that the California Water Plan is California's umbrella strategic document for water resource management in California. Coordination efforts specific to coordination between the CVFPP and The California Water Plan Updates should be addressed.	
272-39	USACE	USACE		2012 CVFPP Public Draft	2/	page 2-1	EAD as related to NED should not include local business losses. Business losses are usually accounted for in the Regional Economic Development (RED) account as most times these losses are viewed as transfers on a national level. Business Losses should not be added on to NED losses to establish the No Project condition damages.	
272-40	USACE	USACE		2012 CVFPP Public Draft	2/2.3.1	Page 2-4	Suggest including levee height increases as possible method to restore or enhance system capacity. Given the physical constraints, there may be locations where this is the only feasible method. In addition, there may be locations where this would promote higher geomorphic stability than other methods. Levee height increases are described in the technical documentation.	
272-41	USACE	USACE		2012 CVFPP Public Draft	2/2.4.1	Page 2-7	The USACE does not determine federal interest based on achieving protection from any particular flood event. Pursuing projects based on achieving a targeted level of protection may not be a viable approach for projects where California is expecting federal participation through the USACE.	
272-42	USACE	USACE		2012 CVFPP Public Draft	2	Page 2-7 and 2-29	There is no federal standard of flood protection defined for developed vs: undeveloped areas. FEMA uses a 100-yr base floodplain to define the Flood Insurance and floodplain management requirements necessary for a community to be included in the NFIP; however, NFIP does not distinguish between developed and undeveloped areas.	
272-43	USACE	USACE		2012 CVFPP Public Draft	2/;2.5.1	Page 2-12	Given the physical constraints, at what event(s) would 32,000cfs be diverted through the bypass identified in the first bullet point on the page? Please elaborate.	
272-44	USACE	USACE		2012 CVFPP Public Draft	2/2.6.1	Pages 2-14- 15	USACE projects are generally required to incorporate non-structural methods of achieving flood risk reduction. To the extent that USACE participation is expected in projects included in the CVFPP, the consideration of non-structural approaches to flood risk reduction should be incorporated.	Add non-structural elements to at least one of the three preliminary approaches.
272-45	USACE	USACE		2012 CVFPP Public Draft	2/	Table 2-2	Recommend that similar levels of forecasting and notification be included in all three approaches.	
272-46	USACE	USACE		2012 CVFPP Public Draft	2/2.6.1	Page 2-17	Note: The draft CVFPP uses the terms "ecosystem mitigation" and "ecosystem restoration" interchangeably. In order for the CVFPP to be integrated with the Corps' planning process, the CVFPP text should be revised for clarity and consistency. Mitigation is generally meant to compensate for loss of habitat due to the implementation of the project. Restoration is when habitat is restored above and beyond the compensation required for project impacts.	The CVFPP text should be revised for clarity and consistency with USACE terminology.
272-47	USACE	USACE		2012 CVFPP Public Draft	2/2.6.1	Page 2-18	Text notes that modeling considers levee condition and the probability of levee failure. These assumptions are critical to assessing flood risk and potential methods to reduce risk. Recommend describing these assumptions.	
272-48	USACE	USACE		2012 CVFPP Public Draft	2/	Figures 2-3 and 2-4	Stage sensitivity for a 1% Annual Chance Exceedance Flood are provided. The values are highly dependent on the hydraulic assumptions. However, the assumptions are not described. Suggest describing the assumptions in the document. In addition, comparison of stage for a single event does not reflect the residual flood risk for each approach.	Figure 2-6. This graphic would be helped by the addition of a no project column for comparison purposes. Comment valid for Figure 3-6 and 4-1.
272-49	USACE	USACE		2012 CVFPP Public Draft	2/2.7	pages 2-25 thru 2-28	The preferred approach- Enhanced Flood System Capacity – may be achievable over a long term approach, due to extremely high cost. Until then the State, Levee Maintenance Agencies, and USACE may spend a large amount of funding enhancing the existing system by improving structurally the existing flood control projects to provide a certain level of protection considering the existing system capacity. Some funding may be without any regrets but some of the expense may be not justified on long run, such as deep seepage cut-off walls for levees that may be later relocated, expensive seepage and stability berms designed for a water elevation that may be much higher than the design water elevation after the enhancement of the flood capacity, and other improvements like that.	
272-50	USACE	USACE		2012 CVFPP Public Draft	2/2.7	pages 2-25 thru 2-28	Achieving SPFC Design Flow capacity may provide protection for the agriculture area as long as the levees are functioning normally. However, these levees were not properly designed and constructed and may breach before the basin will reach its new design capacity. Some structural improvements of these levees may be still required.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-51	USACE	USACE		2012 CVFPP Public Draft	2/	Page 2-26	It is likely that the Protect High Risk Communities Approach would also provide ancillary benefits to rural agricultural flood risk reduction. In many cases there is no hydraulic boundary between urban and non-urban areas.	
272-52	USACE	USACE		2012 CVFPP Public Draft	2/	Page 2-27	Notes significant increases to stage but figures show max 1.2 feet increase. In comparison to the total flood depth along the levee, 1.2 feet does not as significant. Recommend also providing the depth of water to use as a relative comparison.	
272-53	USACE	USACE		2012 CVFPP Public Draft	2/	Page 2-29	There is no minimum level of flood protection (100-yr flood) required for participation in the NFIP.	
272-54	USACE						Comment Removed per request of Commentor	
272-55	USACE	USACE		2012 CVFPP Public Draft	3/	Figure 3-1	Figure shows Feather River Bypass diverting out of Thermalito Afterbay. Flows would be limited to 17,000cfs by the Thermalito power canal. How would 32,000cfs be diverted?	
272-56	USACE	USACE		2012 CVFPP Public Draft	3/	page 3-4	Versions 1.2.4 and 1.2.5 of HEC-FDA are the Corps certified Flood Risk Management Planning Center of Expertise models.	Specify which version of HEC-FDA was used.
272-57	USACE	USACE		2012 CVFPP Public Draft	3/	page 3-4	Explain how levee fragility was accounted for in HEC-FDA analysis.	Revise text per comment.
272-58	USACE	USACE		2012 CVFPP Public Draft	3/		The CVFPP lacks clarity as to real estate requirements for purposes of implementation. There are cases where there is no title or any easement for the flood protection structure and operation and maintenance or any improvement of these existing structures is impossible due to lack of a minimum easement. The plan should include achievement of an easement for the footprint of the levee plus some additional area along the levee toes for proper inspection, operation and maintenance of these flood control structures.	
272-59	USACE	USACE		2012 CVFPP Public Draft	3/3.2		Interior drainage is not addressed in the CVFPP. However, interior drainage is required to be addressed for FEMA certification. Also interior drainage structures may have a negative impact on the flood control structure.	
272-60	USACE	USACE		2012 CVFPP Public Draft	3/		One of the major issues and weaknesses of the existing flood protection is the encroachments and control of the existing encroachments. Some encroachments are not authorized and some of them are reducing the levee integrity. The plan does not indicate how will be this issue addressed.	
272-61	USACE	USACE		2012 CVFPP Public Draft	3/3.3	pages 3-9 thru 3-10	It is not clear how small communities and rural areas will receive increase flood protection through improvements focused on adjacent urban areas. As an example, it is not clear how the RD1001, on the north side of the Natomas Cross Canal and the 3 rural levees on the west side of the Sacramento River will benefit from the improvement made on Natomas levees (on the south side of the Natomas Cross Canal and east side of the Sacramento River) which include raising the levees to 200 year of protection. These rural levees will remain weaker than before the Natomas Basin and susceptible to overtopping due to increase in elevation of the Natomas Basin levees.	
272-62	USACE	USACE		2012 CVFPP Public Draft	3/	page 3-15	Specify what tool/program was used to estimate building costs per square foot by structure type.	Revise text per comment.
272-63	USACE	USACE		2012 CVFPP Public Draft	3/	page 3-16	It is standard USACE practice to use guidance specified in IWR Report 95-R-9 (April 1995) for the purposes of estimating depreciation. The CVFPP should include a rationale for utilizing the M&S method.	Provide rationale for utilizing M&S method for the CVFPP analysis.
272-64	USACE	USACE		2012 CVFPP Public Draft	3/3.5	pages 3-12 thru 3-18	The system wide improvement consisting of widening the existing bypasses and construction of new bypasses does not solve the biggest issues of the Central Valley Flood Control System which are the weakness of the existing flood control features either due to inadequate construction methods and materials; to foundation issues; to existing encroachments and penetrations; and due to woody vegetation on levee slopes.	
272-65	USACE	USACE		2012 CVFPP Public Draft	3/3.5.7	page 3-18	Suggest including levee height increases as potential method to mitigate for flood stage increases. Given the physical constraints, there may be locations where this is the only feasible method. In addition, there may be locations where this would promote higher geomorphic stability than other methods.	
272-66	USACE	USACE		2012 CVFPP Public Draft	3/3.7	page 3-21	Thirty samples may not be adequate to provide a statistically significant result, especially when you are using sample sizes greater than 30 for structure characteristics.	Step 6-7: Suggest conducting sensitivity using greater than 30 sampled parcels for empty parcels.
272-67	USACE	USACE		2012 CVFPP Public Draft	3/3.10	pages 3-25 thru 3-29	The leading paragraph of section 3.10 states "The following provides context for the USACE policy and the State's resultant levee vegetation management strategy described in Section 4." USACE does not agree that sections 3.10/3.10.1 accurately provide context for the USACE policy.	Section 3.10 should be completely rewritten to summarize ETL 1110-2-571, the draft policy guidance letter for vegetation variances which outlines proposed policy for regional variances as required by WRDA 1996, Section 202(g), and the 1949 deviation to the Sacramento River Flood Control Project Standard O&M manual.

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-68								
272-69	USACE	USACE		2012 CVFPP Public Draft	3/3.10.2	page 3-29	The intent of paragraph 3.10.2 is unclear.	The section should be completely rewritten to summarize the State's intent for vegetation compliance within rural-agricultural areas. To provide a complete picture, the revised section should not only address whether the State intends to comply with PL 84-99 inspection standards, but also if the State intends to comply with the requirements of the O&M manuals for these areas. If the State's intent is not to comply with the O&M manuals, the State should be clear what options may be pursued to meet the commitments of the original assurances provided for the authorized project (eg. Deauthorization, regional vegetation variance, etc.)
272-70	USACE	USACE		2012 CVFPP Public Draft	3/3.11	page 3-30	It is not clear whether the cost estimates for the three approaches discussed in Section 4 include costs for residual risk management. The last sentence of Section 3.11 of the draft CVFPP states: "investments in residual risk management must continue." That implies that costs for residual risk management have been included. Revisions for clarity are needed.	
272-71	USACE	USACE		2012 CVFPP Public Draft	3/3.13.2	page 3-36	Section 3.13.3 states, "Table 3-7 summarizes contributions of the SSIA to the five CVFPP Goals, compared with No Project." It is not clear where the five goals fit in the referenced table, which includes three major headings and eight subheadings, none of which are clearly identified as the five goals in question. Further, there are contradictions between the text and table, for example, the text states that SSIA would reduce economic damages by 75%, while the table identifies a 67% reduction.	
272-72	USACE	USACE		2012 CVFPP Public Draft	3/3.14	page 3-38	For the Federal government to share in the cost of a project, the Corps would typically identify the National Economic Development Plan (NED). The NED Plan is the basis for Federal cost share. Business production losses are not included in the computation of NED. Modeling should include a scenario that excludes business production losses.	
272-73	USACE	USACE		2012 CVFPP Public Draft	3/3.14.1	page 3-39	Provide specific project information for the "Final Economic Reevaluation Report (2008)" that is referenced in text.	Revise text per comment.
272-74	USACE	USACE		2012 CVFPP Public Draft	3/3.14.4	page 3-41	First Bullet, Text specifies that Expanded floodways would create space for river meandering, sediment erosion and deposition. River meandering does not appear to be applicable to setbacks along the bypsss reaches. During development of the improvement approaches, were levee setbacks evaluated along the Sacramento river where river meandering is applicable?	
272-75	USACE	USACE		2012 CVFPP Public Draft	3/	page 3-42	Need to clarify that not all crops would sustain losses based on the 5 day trigger point. Generally, field crops, alfalfa and other legumes, truck crops, and other basic crops can be evaluated using the 5 day trigger point. Orchards and vineyards, due to their deep root zones have a larger tolerance for flooding on average.	Consider an adjustment to the mortality rates on orchards and vines
272-76	USACE	USACE		2012 CVFPP Public Draft	4/4.1.1	Page 4-2	Section 4.1.1. does not thoroughly address the need to and strategy for informing the public during floods. Successful emergency response programs hinge on communication with the public. Please consider adding additional details to this section.	
272-77	USACE	USACE		2012 CVFPP Public Draft	4/4.1	page 4-2 to 4-10	The "Three Amigos" project is a non-structural alteration to the existing project. While a portion of the levees would be removed through breaching, the area behind the levees will become part of the Federal flood control project as a floodway. So there is still a Federal flood control feature at that location and the State of California will have to maintain this feature (i.e., floodway) in accordance with the revised O&M Manual that will be provided following completion of the project. The Three Amigos project is not a deauthorization of any portion of the flood control project, it is simply a change to it. The last sentence of the first paragraph is factually incorrect. The USACE has procedures in place for breaching the levees at Three Amigos but before this can occur, compliance with NEPA must be updated due to the lapse in time since the project started. Additionally, USACE and the USFWS will conduct outreach to landowners who will be affected again due to the amount of time that has passed since outreach was originally conducted. Once these steps are accomplished, the levee can be breached and the project completed.	
272-78	USACE	USACE		2012 CVFPP Public Draft	4/4.1	page 4-2	The FY11 Federal Discount rate was 4.125% and the FY12 Federal Discount rate is 4%.	Explain why discount rate of 7.625% was used.
272-79	USACE	USACE		2012 CVFPP Public Draft	4/4.1	Page 4-2	Suggest that the state also coordinate and maintain archive of post processed quality controlled flow and hydrologic data for use in engineering studies. Current CDEC real-time data are not quality controlled, have missing data when communication links are broken, etc. This limits the usefulness for engineering studies.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-80	USACE	USACE		2012 CVFPP Public Draft	4/4.1.2		The Operation and Maintenance program should address flood protection structures within a basin which are not part of the program such as non-program non-urban or urban levees, highways and railroad embankment. These levees and embankment are part of the flood protection system but are not maintained or operated by the CVFPP. Some of these structures are not designed and constructed for flood reduction purposes (i.e. highway and railroad embankments), there is no access for inspection or flood fighting and their poor maintenance may lead to flooding of the	
272-81	USACE	USACE		2012 CVFPP Public Draft	4/4.1.4	Page 4-7	The USACE now identifies our projects as flood risk management projects. Although modification of a Federal flood risk management project does require approval by the USACE, the USACE will not necessarily participate in any projects that receive that approval. With regard to feasibility studies that the Corps is conducting in the Central Valley, the USACE cannot anticipate or guarantee that any particular study will lead to either Congressional authorization or appropriation.	
272-82	USACE	USACE		2012 CVFPP Public Draft	4/4.1.5	Page 4-12	Recommend refining approach based on potential for system impacts. This may not be related to the size of project. For example, modification of flood control diagrams may impact water supply storage and would need to be evaluated as a system.	
272-83	USACE	USACE		2012 CVFPP Public Draft	4/4.2	page 4-14	The first two bullets appear to be the same. Please clarify or consolidate	
272-84	USACE	USACE		2012 CVFPP Public Draft	4/4.2	page 4-14	3rd bullet: How is this final bullet going to be achieved given the real estate challenges DWR has revealed regarding planting. A discussion should be included regarding updating easements to reflect current language if this is a goal	
272-85	USACE	USACE		2012 CVFPP Public Draft	4/4.2	page 4-15	2nd bullet: Recommend deleting the second sentence of this bullet because it doesn't relate to the issue raised in the first sentence of this bullet. Furthermore, USACE is not in agreement with the second sentence. Finally, the second sentence seems to conflict with the life cycle management approach as described elsewhere in the CVFPP	
272-86	USACE	USACE		2012 CVFPP Public Draft	4/4.2	page 4-15	3rd bullet: The first sentence is unclear. What is the accepted engineering practice or how will it be developed?	
272-87	USACE	USACE		2012 CVFPP Public Draft	4/4.2		Through inspections, both DWR and USACE have identified many areas where landscaping does not meet the visibility and accessibility standard. A discussion on <u>how this will be handled should be included</u>	A discussion on how this will be handled should be included
272-88	USACE	USACE		2012 CVFPP Public Draft	4/4.2	4-13 thru 4-16	There is no reference to the updating of California Code of Regulations, Title 23, <u>Waters technical sections to be consistent with the CVFPP</u>	Add a section suggestion that CCR Title 23, Waters technical sections <u>be update to reflect the CVFPP, as adopted</u>
272-89	USACE	USACE		2012 CVFPP Public Draft	4/4.2	Section Wide	Note: The last sentence of this comment isn't very clear. It suggests addressing vegetation under the Framework, but my understanding of the Framework is that is sets out interim actions pending completion of the CVFPP which would address more long term solutions. This comment seems to suggest continuing the interim actions...which is at odds with the comment at line 9 above.	
272-90	USACE	USACE		2012 CVFPP Public Draft	4/4.2.1	page 4-16	Change the word "indefinitely" to "while working on higher priority risks" as that <u>seems to better reflect DWR's described intent</u>	
272-91	USACE	USACE		2012 CVFPP Public Draft	4/4.4	page 4-18	"These feasibility studies will be prepared in coordination with the USACE and in conjunction with its CVIFMS." CVIFMS is a cost-shared study being led by USACE, <u>DWR, and the Central Valley Flood Protection Board</u>	
272-92	USACE	USACE		2012 CVFPP Public Draft	4/4.5	Section Wide	Note: Adding a specific reference to the relevant section of the Framework <u>Agreement would help to clarify this comment.</u>	
272-93	USACE	USACE		2012 CVFPP Public Draft	4/4.6		The cost of implementation of the Framework requirements should be included.	
272-94	USACE	USACE		2012 CVFPP Public Draft	4/4.7.1	Page 4-38	Figure 4-7 appears to assume a Federal contribution of 46% to the total CVFPP costs. It is premature to assume any Federal contribution that has not already been appropriated. Because federal interest has not yet been established in many elements of the CVFPP, the USACE is not in a position to determine whether this conjecture, or any other assumption regarding future federal participation, is reasonable. Further, because Operation and Maintenance costs are always 100% the responsibility of the local sponsors of federal projects, no federal participation in the long-term cost of the project should be assumed.	
272-95	USACE	USACE		2012 CVFPP Public Draft	4/4.7.1	page 4-38	The description of financing in the draft CVFPP appears to rely on several assumptions regarding Federal participation and cost-sharing. Those assumptions should be identified and explained. Because federal interest has not yet been established in many elements of the CVFPP, the USACE is not in a position to determine whether this conjecture, or any other assumption regarding future federal	Add text regarding assumptions for Federal cost share.

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-96	USACE	USACE		2012 CVFPP Public Draft	4/4.9	page 4-42	With regard to the list of federal program policies and permitting identified on Page 4-42: This is clearly not an exhaustive list of the federal programs, policies, and permit requirements. Recommend removing this entire sub-section. Rather, recommend summarizing in one bullet that there are many federal, state and local programs, policies and permits that will be required to achieve the goals of the CVFPP. In some instances these programs may be in conflict and a lot of	
272-97	USACE	USACE		Attachment 7 Plan Formulation	General	N/A	Suggest noting the date or version of any design criteria utilized (for example levee design criteria). The various criteria are evolving and reference needs to be clear.	
272-98	USACE	USACE		Attachment 7 Plan Formulation	General	N/A	Suggest describing the no project conditions in the no project conditions section (section 7.2) Most of the technical detail describing the no-project condition is distributed throughout each project approach (sections 7.3 and 7.4). Terms and metrics used in earlier sections are not explained until later sections.	
272-99	USACE	USACE		Attachment 7 Plan Formulation	General	N/A	Each table or figure should describe the condition (no project, or the project approach).	
272-100	USACE	USACE		Attachment 7 Plan Formulation	General	N/A	Comparisons of stage are presented for a 1% Annual Chance Exceedance Flood. However, stage may show more sensitivity at other frequencies. A flood stage comparison for a 5% ACE flood might be contained by the levee and increase by 5 feet. However, the 1% flood might exceed the levee capacity and only increase 0.5 feet.	
272-101	USACE	USACE		Attachment 7 Plan Formulation	General	N/A	Recommend providing maps that describe the improvements for each approach.	
272-102	USACE	USACE		Attachment 7 Plan Formulation	2/	Page 2-13	Frazier Creek/Strathmore Creek and White River/Deer Creek are located in the Tulare Basin, which is outside the CVFPP study area.	
272-103	USACE	USACE		Attachment 7 Plan Formulation	3/	Page 3-8	Recommend including description of Butte Basin Overflow area. Similar to reservoirs, the approximately 1 million acre feet of transitory storage within this area is extremely important to the operation of SPEC facilities.	
272-104	USACE	USACE		Attachment 7 Plan Formulation	3/	Page 3-17	Recommend describing how current flood protection requirements specified in the California Code of Regulations would affect population growth and development.	
272-105	USACE	USACE		Attachment 7 Plan Formulation	5/	Page 5-9	Description of section 9616 of the California water code includes the wording "eliminating" the levee threat factors. The term "Elimination" does not convey the concept of residual risk.	
272-106	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-2	Suggest changing the word "room" to "capacity" in the sentence - "This approach combines most of the features of the above two approaches and provides more room within flood conveyance channels."	
272-107	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-6	Generally, business losses should not be added to Structure/Content/Agriculture losses as they are in different categories (Regional vs. National).	Revise text per comment.
272-108	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-7	3rd bullet. Suggest clarifying this sentence. These fragility curves are for existing levees. Not new levees.	
272-109	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-10	Was the Feather River Star Bend setback levee included?	
272-110	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-12	Last Paragraph, If applicable, suggest noting that remedial actions would be based on the latest design criteria.	
272-111	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-14	Last sentence No changes in reservoir operations rules or in the way is unclear. Suggest rewording the sentence.	
272-112	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-15	Recommend providing more technical details on the ULE and NULE since this forms basis for each plan approach. For example, how were the ULE and NULE reaches identified? How does Low, Moderate, High relate to the levee design criteria.	
272-113	USACE	USACE		Attachment 7 Plan Formulation	7/	7-15	USACE does not believe that business losses of \$101 million is a correct estimate. That number should be verified and supporting information should be provided in the CVFPP.	Confirm that totals are correct.
272-114	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-30	Figure 7-14 and 7-15 and other similar maps. Are the reduction in damages color coded by basin or is this the amount for all areas of that color? The amount of benefits within the Butte Basin (largely agricultural) is shown to have a similar benefits as the Sacramento urban area. Recommend verifying those numbers.	
272-115	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-34	Suggest moving the discussion of threats earlier in the document where it is first discussed.	
272-116	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-54	Costs associated with F-CO/F-BO are included but description of alternative on page 7-47 specifies that F-CO/F-BO are not included in the alternative.	
272-117	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-55	Would the plan also include increased levee elevations in some areas?	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-118	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-61	For the proposed Feather River Bypass, recommend describing the flood frequency these flows would be bypassed.	
272-119	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-62	Figure 7-25 shows Feather river bypass from Thermalito afterbay. Is this correct?	
272-120	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-63	Suggest clarifying that transitory storage is not comparable with reservoir storage. Attenuation of flood waves attributable to levee setback transitory storage is likely to be very minor relative to the same storage provided as flood space.	
272-121	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-64	Figures 7-26 and 7-27. Note at top of graphic specifies increased flood storage at Lake Oroville/New Bullards Bar. Is the storage being increased or is this the "equivalent flood storage" mentioned in the text. Recommend not using the term "equivalent flood storage". Describe the actual component, for example reoperation. Figure uses the term "attenuate flood peak". Is flood wave attenuation the primary reason for the stage decrease or is it the result of increased conveyance	
272-122	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-68	Figure 7-30. The project diverts 32,000cfs from the Feather River into the Butte Basin. However, damages are shown to be reduced. Is this correct?	
272-123	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-72	Recommend that similar levels of forecasting and notification be included in all three approaches.	
272-124	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-73	The following sentence "LOP is defined as the amount of flood protection able to withstand flooding for AEP" is not clear. Recommend revising sentence.	
272-125	USACE	USACE		Attachment 7 Plan Formulation	7/	Page 7-75	Figures 7-32 and 7-33 What are the numbers at the top of each bar chart? It appears they are the total for the bar but there are more numbers than bars.	
272-126	USACE	USACE		Attachment 7 Plan Formulation	8/	Page 8-28	The 1997 event delta stages would have been greater under a sea level rise scenario. The 1997 flood event stages may serve as a sea level rise surrogate for smaller flood simulations (less than 1997 event), but would be the opposite for large flood events(greater than 1997 flood)	
272-127	USACE	USACE		Attachment 7A Regional and Local Project Summaries	1/	Page 1-145	David VanRijn is no longer with USACE.	Replace with Brandon Muncy.
272-128	USACE	USACE		Attachment 7A Regional and Local Project Summaries	1/	Page 1-148	William Edgar is no longer with the Sutter Butte Flood Control Agency.	Insert name of his replacement.
272-129	USACE	USACE		Attachment 7A Regional and Local Project Summaries	1/	Page 1-154	The USACE understands that the Project proponent of the West Stanislaus, Orestimba Creek project is the City of Newman, not the City of Woodland. The document should be corrected.	Revise text per comment.
272-130	USACE	USACE		Attachment 7A Regional and Local Project Summaries	1/	Page 1-156	An EA/IS is being developed for the West Stanislaus, Orestimba Creek project; no EIS/EIR is being developed. The proposed segment with adverse effects has been removed from the study. The bullet point regarding Adverse Environmental Effects should be removed from the draft CVFPP	Revise text per comment.
272-131	USACE	USACE		Attachment 7A Regional and Local Project Summaries	1/	Page 1-156	Redirected Hydraulic Impact - language should be changed to read: "localized increased in the depth of flooding up to half a foot may occur in areas outside of the chevron levee."	Revise text per comment.
272-132	USACE	USACE		Attachement 8A Hydrology	1/	Page 1-1	The lack of major flooding in the last 10-yrs is not a reasonable rationale to forego re-evaluation of the hydrologic frequency analysis. A more appropriate rationale would be that extension of the hydrologic record length to include recent data would not substantially increase the record length and computed statistics.	
272-133	USACE	USACE		Attachement 8A Hydrology	1/	Page 1-2	Text and figure 1-1 indicate that the points shown are the storm centers. These are not the "centers" These locations are the hydrologic index points for which a storm centered upstream produces the critical flow (or stage) at that location.	
272-134	USACE	USACE		Attachement 8A Hydrology	2/	Page 2-6	Suggest replacing the term "maximum allowable flow" rather than the term "maximum regulated flow."	
272-135	USACE	USACE		Attachment 7A	General	General	Water Resource studies and projects conducted by the USACE are always joint Federal-non-Federal efforts. USACE serves as the lead Federal agency. The non-Federal study or project partner is the lead non-Federal agency.	
272-136	USACE	USACE		Attachment 7A	General	General	The Delta Islands and Levees Feasibility Study is an active USACE-DWR feasibility study/ The study area is the legal Delta and adjacent floodplains. The authorized study purposes are ecosystem restoration, flood risk management and other related water resources purposes. The USACE POC is the Project Manger, Dennis Clark.	
272-137	USACE	USACE		Conservation Framework	1	1-2	"This Conservation Framework...will complement the federal Central Valley Integrated Flood Management Study (CVIFMS)." The CVIFMS is being conducted as part of a Federal-State partnership: USACE is the Federal partner; DWR and CVFPB are the non-Federal partners.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/Section	Page No.	Comment	Proposed Modification
272-138	USACE	USACE		Conservation Framework	General	General	The relationship between the CVFPP and the Conservation Framework and Strategy is not clear. Since the EIR is not yet available, it is also unclear if the Conservation Framework will be addressed in the EIR.	
272-139	USACE	USACE		Conservation Framework	5	5-32	Recommend this section include a discussion of how the new lead scientist and the CVFPP science and adaptive management programs would interface/integrate with other existing or planned monitoring, science, and adaptive management programs and their lead scientists. Key examples include: Delta Science Program and Lead Scientist, Interagency Ecological Program and Lead Scientist, State and Federal Water Contractors Lead Scientist, BDCP adaptive management plan and governance	
272-140	USACE	USACE		Conservation Framework	5.7 & 7	5-28, 7-2	"Improving environmental scientific and technical basis for informing flood management decisions." How will this effort interface with the Interagency Ecological Program?	
272-141	USACE	USACE		Conservation Framework	7	7-2	Bullet 3 - Recommend including "synthesis" in the following sentence: "Improvements are made through inventory, analysis and modeling, monitoring, management oriented-research, and information management and access. Recommend also including "synthesis" in Section 5.7 (page 5-28).	
272-142	USACE	USACE		Conservation Framework	7	7-2	Bullet 3 -Consider encouraging timely information transfer through conference presentations, and through publication in credible peer-reviewed publications. Recommend also considering this for inclusion in Section 5.7.	
272-143	USACE	USACE		Conservation Framework	General	General	While the Conservation Framework provides support for the CVFPP's goals by identifying environmental guidelines for flood project planning and previewing the long term conservation strategy to be completed in 2017, the strategy for vegetation management on levees does not sufficiently describe the plan for achieving consistency with Corps standards for control of wild growth on levees, including identifying areas where variances may be requested. The Conservation Framework also fails to recognize the State's responsibility for fulfilling the assurance agreements for operation and maintenance of the local flood protection projects that have been legislated into the Federal system or transferred in the traditional manner after a cost shared project has been constructed and conveyed to the State. The term "Levees with Preexisting Legacy Levee Vegetation" and the definition of this term will require further discussion with the Corps before being incorporated in the Conservation Strategy because this term is not used in the Corps' ETL 1110-2-571 or draft variance guidance. The vegetation maintenance strategy should focus on reducing risk to public safety. The life cycle management strategy can be an acceptable approach to reducing risk and complying with environmental values. Continuing to collaborate with the Corps	
272-144	USACE	USACE		VOL IV Attachment 8F	3	3-46	It is understood that the period of inundation of flood waters will affect the mortality of the crops in question. The mortality is expected to vary depending on the season of the year and the crop type. Annual crops are very vulnerable to flooding and be killed with as little as 3 days of flooding or less. Orchards and vine crops are typically more resilient and can be subjected to floods in excess of 30 days during certain times of the year without noticeable effects. The analysis presented makes a sweeping statement to all crops which is too general in nature; especially when one considers that the re-establishment of the orchards and vine constitute a significant part of the damages estimated in the analysis.	
272-145	USACE	USACE		VOL IV Attachment 8F	3	3-48	To accommodate the variability in prices received and prices paid, one could use an @Risk software program. This program could provide for uncertainty in the prices as well as the variability in seasonal plantings. This is easily accomplished and will handle the uncertainty issues around the prices and seasonal variability.	

Index	Commentor	Commentor Agency	Contact Email	Document	Chapter/ Section	Page No.	Comment	Proposed Modification
272-146	USACE	USACE		VOL IV Attachement 8F	3	3-53	The section "Business loss per flood event" addresses the affect of interrupted business to the brick and mortar businesses easily identified in the micro- economic arena. It is my contention that these losses also will also be felt by industries in the area. Specifically, impacts to hydropower generation and gas powered generation facilities could be impacted by floodwaters through restriction of access to manage these industrial plants. Additionally, the pumps that pump water from the Delta may be affected by floods, either from the direct impact of flooding to the facilities or by the necessity of the pumps to re-operate based on the impacts that floods cause to salt water intrusion, to name just one effect. Loss to recreation and tourism is another area that would be impacted. The industrial impacts, either directly or indirectly, can create a significant burden on the economy and should, at a minimum, be noted in the report.	
273	Jennifer Montgomery	Placer County Board of Supervisors	broberts@placer.ca.gov	CVFPP/ULDC			See Letter	
274	Joseph Grindstaff	Delta Stewardship Council		CVFPP			See Letter	
275	Jeffery Flynn	NA	jeff@flynnmail.net	NA			The proposed bypass expansion is a huge waste of tax payer money, violation of long standing property owner rights, destructive to legacy communities and completely unwarranted. This appears to be an environmental habitat expansion that is not essential to the core mission of flood protection. A state grab of over 40,000 acres (over sixty square miles) smacks of a gross over reach that adversely impacts state tax revenues as this is some of the most productive farming in the state. Many of the levee's in these areas have been recently renovated and their removal is a huge waste of money. This multi-billion dollar component of this plan should be eliminated.	Eliminate the following bypass expansion proposals: Feather River Bypass Sutter Bypass Yolo Bypass Sacramento Bypass Lower San Joaquin River Bypass
276	James D. Beck	Agriculture Stakeholder		CVFPP			See Letter	
277	Ken Anderson	Louis M. Anderson Enterprises		CVFPP			See Letter	
278	Evelyn Lund	Agriculture Stakeholder		CVFPP			See Letter	
279	Evelyn Lund	Indian HillLand Co		CVFPP			See Letter	
280	Ed Hulbert	Butte Creek Farms		CVFPP			See Comment Card	
281	Jackie and Jack Wisler	Agriculture Stakeholder		CVFPP/DPEIR			See Comment Card	
282	Ryan J. Coker	Agriculture Stakeholder		CVFPP			See Letter	
283	Charles Sheppard	CP Sheppard Farms		CVFPP			See Letter	
284	Dennis Lindberg	CD Farms		CVFPP			See Letter	
285	Larry Montna, Stanley Cleveland, Larry Munger, Jim Whiteaker, James Gallagher	Sutter County Board of Supervisors		CVFPP/DPEIR			See Letter	
286	Marco Bragoli	Anderson Bragoli Farms		CVFPP			See Letter	
287	Duplication of Index No. 213							
288	Brandon Flynn	Sacramento Valley Landowners Association		CVFPP			See Letter	
289	David Okita	Solano County Water Agency		CVFPP			See Letter	
290	Robert L. Frith	City of Biggs		CVFPP/DPEIR			See Letter	
291	Fritz Durst	Agriculture Stakeholder		CVFPP			See Letter	
292	Ken Grehm	Placer County Flood Control and Water Conservation District		CVFPP/DPEIR			See Letter	
293	Fred A. Freitas	Butte County Rice Growers Association		CVFPP			See Letter	
294	Herman Von Borstel			CVFPP			See Letter	
295	Mary Jane Griego	Three Rivers Levee Improvement Authority/Yuba County Water Agency		CVFPP/DPEIR			See Letter	
296	Robert Thomas	Reclamation District 2035		CVFPP			See Letter	
297	Marianne Fitzgerald	Agriculture Stakeholder		CVFPP			See Letter	
298	Rhon Hemdon	City of Roseville		CVFPP/DPEIR			See Letter	
299	Jerry Fichter	City of Gridley - Mayor		CVFPP			See Letter	