



CALIFORNIA CENTRAL VALLEY
FLOOD CONTROL
ASSOCIATION

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November 17, 2017

State Water Resources Control Board

1001 – I Street

Sacramento, CA 95814

Sent Via Email: RB5S-Climate-Change-Comments@waterboards.ca.gov

SUBJECT: Comments on CVRWQCB Proposed Climate Change Work Plan

Dear Water Board:

The California Central Valley Flood Control Association (CCVFCA) is writing to offer comments on the Proposed Central Valley Region Climate Change Work Plan, which focuses specifically on addressing impacts due to drought and flooding.

CCVFCA was established in 1926 to promote the common interests of rural and urban local flood management agencies sharing in the responsibilities associated with reducing the risks of flooding in the Sacramento and San Joaquin Rivers and their tributaries, including the Delta. Today, CCVFCA is the premier flood protection advocacy organization comprised of over 75 members with a wide spectrum of flood control expertise: reclamation districts conducting surface drainage and routine levee maintenance; cities and counties managing stormwater and levee systems; regional agencies constructing urban flood control improvements; and associated consulting firms.

Overall, the Work Plan does a good job of anticipating potential strategies for responding to future conditions resulting from increased frequency of extreme flood and drought events and long-term rises in sea level due to climate change. The report acknowledges these changing hydrologic forces are expected to produce increased concentrations of sediment that will impact navigation, reservoir storage capacity, and other beneficial uses. Sediment loading also reduces channel capacity needed to quickly and safely evacuate flood flows during high water events that are predicted to occur with more frequency and intensity (atmospheric rivers).

If losses in reservoir capacity due to sediment loading coupled with more frequent and intense atmospheric rivers and larger snow pack require changes in reservoir operations such as releasing water earlier or in greater volumes, then the State will also need to take action to ensure these flood flows can be accommodated downstream. The Work Plan should therefore identify responses that could accommodate higher volume and velocity flows in river channels.

CCVFCA recommends that *Section 2.3 State-Wide Climate Change Response Measures* of the Work Plan acknowledge that changes in reservoir operations and increased investments in levees are types of actions to consider in response to the amplified erosion processes and increases in sediment loading that affect water storage management capacity and efficient evacuation of flood flows.

In addition to funding levee improvements to keep up with sea level rise, sediment can be managed by conducting dredging operations rivers and Delta channels to maintain the design flood flow capacities. These efforts would be consistent with public safety and climate change objectives in the Central Valley Flood Protection Plan being implemented by the Central Valley Flood Protection Board and Department of Water Resources.

Thank you for the opportunity to comment on actions that can be incorporated into the Central Valley Region Climate Change Work Plan to address anticipated changes in hydrology by building resilience to increased risk of more intense floods under increased precipitation and sea level rise conditions.

Sincerely,

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

Melinda Terry,
Executive Director

Cc:

Grant Davis, DWR Director
Bill Edgar, CVFPB Chairman