



CALIFORNIA FARM BUREAU FEDERATION

LEGAL SERVICES DIVISION

2600 RIVER PLAZA DRIVE, SACRAMENTO, CA 95833 • PHONE (916) 561-5665

August 16, 2019

Via electronic mail:

oal_amendRRP1@deltacouncil.ca.gov

Erin Mullin, P.E.
Senior Engineer Delta Stewardship Council
980-9th Street, Suite 1500
Sacramento, CA 95814

Re: : DLIS Rulemaking - Request for Extension of Public Comment Period

Dear Ms. Mullin:

The California Farm Bureau Federation ("CFBF") is a non-governmental, nonprofit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout the state of California and to find solutions to the problems of the farm, the farm home, and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing approximately 35,800 agricultural, associate, and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources.

CFBF writes, in conjunction with San Joaquin and Sacramento County Farm Bureaus, concerning the current August 19, 2019 comment deadline and related August 22, 2019 meeting agenda item concerning the Delta Stewardship Council ("Council")'s proposed rulemaking concerning its Delta Levees Investment Strategy ("DLIS").

A new rule potentially affecting funding for and maintenance of Delta levees is a matter of keen interest to our organizations. Farm Bureau has many affected members in the Legal Delta, whose farming operations, livelihoods, and property values depend on integrity of Delta levees.

A preliminary review of the Council's proposed DLIS rule suggests the rule is at odds with current laws, directives, regulations and long-standing systems and practices that, while themselves inadequate or sub-optimal in some respects, have nonetheless functioned



remarkably well in the Delta over many years. These existing procedures, programs and systems are the front line of defense on flood safety and protection for hundreds of thousands of acres of unique and highly productive farmland in the Delta.

The proposed rule also appears to conflict with existing federal and state standards and definitions and existing policies and priorities existing for Delta levees both within the California Department of Water Resources (concerning the existing Delta Levee Subventions and Special Projects programs) and at the Central Valley Flood Protection Board (with respect to state priorities for project levees).

In short, the Council's proposed rule appears to conflict with important existing policies, procedures, plans, regulations and programs relating to Delta levees, while communities directly affected by the proposed rule have not had sufficient time or opportunity to properly study and weigh in on the current proposed rule.

For these and other reasons, Farm Bureau respectfully requests that the Council delay its currently agendized August 22nd vote on proposed DLIS rule—and that it allow additional time for comments and further discussions.

Questions regarding this request may be directed to Justin Fredrickson at 916-561-5673. Thank you for your urgent consideration of this request!

Very truly yours,

A handwritten signature in black ink, appearing to read "Justin Fredrickson", with a long horizontal stroke extending to the right.

Justin Fredrickson

/JF

Cc:

Bruce Blodgett, Executive Director
San Joaquin Farm Bureau Federation
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Lindsey Liebig, Executive Director,
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