



# Meeting Summary

## Upper San Joaquin Regional Conditions Work Group Meeting #5

**October 29, 2009, 9:00 am – 3:00 pm**

**Location: UC Merced Cooperative Extension  
2145 Wardrobe Avenue  
Merced, California 95341-6445**

### WORK GROUP ATTENDANCE:

Name	Organization	Status
Leo Capuchino	City of Mendota	Member
Sarge Green	CA Water Institute, CSU Fresno	Member
Richard Harmon	Landowner/Grower, Dos Palos, Calif.	Member
Reggie Hill	Lower San Joaquin Levee District	Member
Kellie Jacobs	County of Merced	Member
Jerry Lakeman	Fresno Metropolitan Flood Control District	Member
Bill Luce	Friant Water Authority	Member
Mari Martin	Resource Management Coalition	Member
Diana Westmoreland Pedrozo	Merced County Farm Bureau	Member
Monty Schmitt	Natural Resources Defense Council	Member
Greg Farley	Madera County Flood Control Agency	Alternate
Gary Hester	CA Department of Water Resources	CVFMP* Program Manager
Brian Smith	CA Department of Water Resources	DWR Lead
Roger Lee	CA Department of Water Resources	CVFPO**
Jim Eto	CA Department of Water Resources	CVFPO**
Eric Clyde	MWH Americas Inc.	Technical Lead
Alexa La Plante	MWH Americas Inc	Team
Pam Jones	Kearns & West	Team, Facilitator
Ben Gettleman	Kearns & West	Facilitation Support / Note Taker

\* Central Valley Flood Management Planning

\*\*Central Valley Flood Planning Office

### Absent:

Randall Anthony	Merced Irrigation District	Member
Margit Aramburu	University of the Pacific, Natural Resources Institute	Member
Julia Berry	Madera Farm Bureau	Member
Dave Koehler	San Joaquin River Parkway and Cons. Trust	Member

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Jose Ramirez	City of Firebaugh	Member
Paul Romero	CA Department of Water Resources, Flood Plain Management Division	Member
John Shelton	CA Department of Fish and Game	Member
John Slater	County of Madera, Resource Management Agency	Member
David van Rijn	U.S. Army Corps of Engineers	Member
Douglas Welch	Chowchilla Water District	Member

### WORK GROUP HOMEWORK/ACTION ITEMS

1. Review Chapter 3 Problems and Opportunities and provide comments by November 6, 2009.
2. Review and provide comments on Problems and Opportunities – Revised Draft Summary of Contributing Factors and their Regional Differences by November 6, 2009.
3. Provide additional comments and suggestions on Draft Objectives by November 6, 2009.

Homework assignments should be sent to DWR lead Brian Smith, [besmith@water.ca.gov](mailto:besmith@water.ca.gov) with a copy to MWH lead Eric Clyde, [Eric.S.Clyde@us.mwhglobal.com](mailto:Eric.S.Clyde@us.mwhglobal.com).

### ACTION ITEMS: PROGRAM TEAM

1. Gary Hester will verify the source of the 200-year state levee criteria (i.e. which legislation the criteria come from).
2. Ben Gettleman will follow up with Margit Aramburu concerning Action Item #4 from Meeting #4 – develop criteria for data collection.
3. Roger Lee will send work group members the document that defines the road map/language in the legislation defining the state plan of flood of control.
4. Eric Clyde will add a question and response to the *Responses to Questions from Meeting #5* document concerning how “area” is defined in categorizing urbanized and urbanizing areas.
5. Alexa La Plante will follow up with Diana Pedrozo Westmoreland on responding to her comments on the Regional Conditions Report (RCR).
6. Eric Clyde will send work group members the draft Objectives statements that were created during Meeting #5 for review and additional comment.
7. Alexa La Plante will confirm what DWR is doing to notify the public of the Valley-wide Forum in February.

### GROUP RECAP (meeting highlights for use by Work Group partners in their communications)

The Upper San Joaquin Regional Conditions Work Group (Work Group) of the CVFMP Program continued its work on October 29, 2009 with the following actions:

- Reviewed and provided comments on revised Problems and Opportunities statements.
- Reviewed and provided comments on CVFPP Goals.
- Reviewed sample CVFPP Objectives and began developing draft Objective statements.

The Work Group’s purpose is the development of content for the RCR, a key component for developing the 2012 CVFPP. The RCR will identify resources, conditions within the Central Valley, flood management and related problems and opportunities, and goals and objectives for use in preparing the CVFPP. The Upper San Joaquin Work Group is one of five regional work groups in the Central Valley.

## MEETING GOALS

1. Respond to Questions Raised in Meeting #4
2. Discuss Refinement of Problem and Opportunity Statements (Chapter 3)
3. Continue Development of Goals and Objectives (Chapter 4)

## SUMMARY

### Welcome and Greetings

Brian Smith, DWR, and Pam Jones, meeting facilitator, welcomed the work group participants. Pam Jones reviewed the meeting purpose, goals and agenda.

### Opening Remarks

Gary Hester, CVFMP Program Manager, welcomed the group and provided opening remarks. Mr. Hester also reviewed with the group the *Responses to Questions from Meetings #4*. Key comments and follow-up questions during the group discussion included:

- **Question #2** – Sacramento and San Joaquin Drainage District and CVFPP Planning Area

Gary Hester noted that the legislation requires local jurisdictions within the Sacramento and San Joaquin Drainage District to consult with the Central Valley Flood Protection Board (CVFPB) prior to preparation and revision of the Safety Elements of their General Plans.

Q: Does the provision to consult with the CVFPB only apply to the dark green areas on the map (i.e. Sacramento/San Joaquin Drainage District)?

A: Yes, only the areas marked in dark green will be required to consult with the CVFPB.

- **Question #4** – Local jurisdiction briefings

Gary Hester reported that DWR is carefully considering how to best conduct briefings with local jurisdictions. Mr. Hester added that DWR has received feedback that complying with the requirements of the legislation is a difficult issue for local jurisdictions to fully understand, and that more outreach will be needed to ensure they understand the significance of the legislation and its requirements. He also noted that economic realities are different today than they were when the legislation was passed, and that many jurisdictions are unclear where the funding will come from to perform analyses related to compliance requirements.

Q: It appears that the issue of compliance is local one (i.e., cities). Why is DWR focusing on outreach in the counties as opposed to cities?

A: DWR is focusing on outreach in the counties first, but will also be conducting outreach in the cities.

Comment: With regards to the 200-year standard, it appears that there are two standards: the 200-year level of flood protection and the FEMA standards. It appears that cities can just meet the FEMA standards.

Response: The legislation requires urban and urbanizing area to comply with the 200-year standard and not the FEMA standard. DWR plans to charter a work group to focus on the 200-year criteria as early as 2010, and will recruit work group members to help identify the criteria.

Comment: Madera County Flood Control & Water Conservation Agency developed a flood hazard ordinance, and it was helpful. It would be helpful to consider developing a minimum standard ordinance to use to inform local jurisdictions.

Response: A document is under review concerning local jurisdictional requirements, and DWR will share that when it is ready. DWR will coordinate with both the planning and floodplain management agencies to ensure that efforts are coordinated.

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Comment: The process must define what an “area” is regarding urbanization. Any area can have 10,000 people depending on its boundaries.

Comment: The requirements are significant enough that developers won't be able to develop according to the legislation. It is likely that they will find ways of getting around them, however.

Comment: Merced County has four incorporated cities and several large urbanizing areas. Counties should have a plan to identify where development should occur. Development shouldn't be at the developers' whim. In Merced County, county lands outside of the urban or urbanizing areas are not protected. Merced County does not have a flood control entity, and it's in a conundrum.

- **Question #6** – Additional recommendations for the Bay Delta Conservation Plan (BDCP) and FloodSAFE coordination

Gary Hester commented that DWR is aware of concerns over coordination, and is trying to identify opportunities to coordinate.

### Review of Meeting #4 Action Items

Roger Lee reviewed the list of action items from Meeting #4 and provided updates:

1. Yung-Hsin Sun, MWH, will send a copy of the Merced County Board of Supervisors PowerPoint presentation (October 7, 2009) to work group members.  
**Status:** Presentation was emailed to work group members on October 16, 2009.
2. Ben Gettleman, Kearns & West, will send work group members the list of currently scheduled city and county board and staff meetings.  
**Status:** List of meetings was emailed to work group members on October 16, 2009.
3. Yung-Hsin Sun will investigate the possibility of presenting on the CVFMP at the California Association of Local Agency Formation Commissions (CALAFCO) Board of Supervisors meeting at Tenaya Lodge.  
**Status:** The program team was not able to get on the agenda for the meeting, but will continue to explore opportunities with CALAFCO and relevant Boards of Supervisors.
4. Eric Clyde, MWH, will develop criteria for data collection.  
**Status:** Ongoing
5. Roger Lee, DWR, will provide instructions to sign up for the FloodSAFE distribution list.  
**Status:** Instructions were emailed to Work Group members on October 16, 2009.
6. Roger Lee will provide an internet link to DWR's Third Draft of Interim Levee Design Criteria.  
**Status:** Internet link was emailed to work group members on October 16, 2009.
7. Facilitation team will identify meeting locations for Meetings #5, #6, and #7 as soon as possible.  
**Status:** Locations for Meeting #5 (UC Merced Cooperative Extension) and #6 (Fresno State Center for Irrigation Technology) have been identified. The location for Meeting #7 has not yet been identified.

### Roadmap and Overview of Topic Work Group Progress

Eric Clyde, MWH, presented on the group timeline and the CVFPP development process. He also provided an update on topic work group progress.

Highlights of the presentation included:

- The Draft RCR will be available for members to review during Meetings #6 and #7.
- The Draft State Plan of Flood Control (SPFC) Descriptive Document will be available in mid-November, 2009. This will define the SPFC. The program team has consulted relevant operations

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and maintenance (O&M) manuals and has summarized them in this document. It took over a year to track down and sort through all the relevant O&M manuals.

- The Flood Control System Status Report (FCSSR) will be revised as needed, as the system will constantly evolve. Some projects will be added and others will be removed.

Comment: A road map of the language in the legislation would be helpful. An official definition of the SPFC is needed. The current definition refers to several different pieces of legislation.

Response: DWR will share a document that defines the “road map” of the language in the legislation.

Q: Is each document a stand-alone document, or will they be used in other documents as well (i.e., California Environmental Quality Act (CEQA)). Will the documents be universal enough to use in other documents?

A: The program team aims to make much of the information re-usable, and doesn't want to lose any of the important detail that has been provided during the process. The team recognizes that a significant amount of information has already been developed, but the report should be concise and readable. There have been internal discussions about the need for a CEQA document for the 2012 CVFPP. The projects will likely require their own environmental documentation, but it is not likely that the Board will adopt the plan without a CEQA document. The CEQA document will allow DWR to make early recommendations.

Q: Will other planning efforts be able to tier off the documents that are created to implement their documents (i.e., CEQA)?

A: The discussion to determine how the documents can be used will happen in early 2010. DWR is trying to determine whether to establish the CVFPP as an actual plan or a guidance document.

Comment: DWR is using data and maps from 2002 for Merced County in the RCR. The data and maps, particularly regarding agricultural production, should be up-to-date and descriptive if they're going to be adopted. The Merced County Farm Bureau releases crop reports every year, which are more up-to-date than the maps DWR is using. The Agriculture Commission is the best source for the new data from crop reports. There is no mention of duck clubs and easements in the RCR. Who is making sure these data are accurate?

Response: The person on the program team who is responsible for addressing this section will contact you to ensure your comments are addressed.

### Chapter 3 – Revised Problems and Opportunities

Eric Clyde presented on the reorganization and revision of the Summary of Problem Statements. Mr. Clyde then introduced the handout *Problems and Opportunities – Revised Summary of Contributing Factors and their Regional Differences*, and invited comments from Work Group members on the document.

Comment: For Problem #8 in “Ecosystem,” there is an opportunity to replicate; duck clubs and farmers worked together to restore the ecosystem, using easements to convey flood flows (i.e., along Sandy Mush connecting eastside and Westside grasslands). We should incorporate success stories when we know about them. The San Joaquin Parkway River Trust also implements these types of programs.

The group then reviewed the handout *Excerpt from Problems and Opportunities – Operations, Maintenance and Repair*.

Comment: In the Opportunities section, a centralized permitting agency might not be best; perhaps just having a centralized permitting process would be better. Having only one agency responsible for permitting is not necessarily a good idea.

Comment2: Agencies currently spend millions of dollars making sure they comply with various entities, and there is no money remaining to implement the project.

## Revised CVFPP Goals

The group reviewed the handout *Relationship of Problems and Opportunities, Goals, and Objectives*. Eric Clyde invited comments from Work Group members.

### Comments on Problems and Opportunities

- **Other Water Resource Needs**
  - The title should be changed. It could be changed to “Water Resources Management Integration.”  
Response: Since this a problem statement, “integration” is not appropriate. It could be changed to “Water Resource Management Needs.”
  - Single-purpose flood management actions will be less competitive for funding, and will have less support. Projects with more support will get more funding.

### Comments on Goals

- **Simplify Operation and Maintenance of the Flood Management System**
  - Q: In this Goal statement, what does “more compatible with natural processes” mean?  
A: As an example, in the Sacramento River Basin, the flood management system was designed to move mine debris. River processes are now causing erosion of the levees, so the design is no longer appropriate. The natural meandering processes of the river cause erosion and sediment transport. There are other natural processes for which having levees right next to the river disrupts natural river processes.
- **Restore Ecosystem Functions in the Flood Management System**
  - This goal seems too absolute. There needs to be an assessment of the feasibility; you can't restore ecosystem functions everywhere.
  - Incorporate “feasible.”
  - Insert “where feasible” at the end of the Goal statement.
  - You want to incorporate the ability to support these things. No one project can provide all the benefits of physical processes, native habitats, etc. It should be a system-wide statement. This is more framed as a project-specific statement.  
Response: The program team wants to make sure the words aren't subject to misinterpretation. It recognizes that there will not be opportunities to incorporate restoring ecosystem function on every project.
  - There are two levels to this statement: plan-related and project-related. These levels should be separated. “Where feasible” is more pertinent to the project-related level.
  - The sentence should read: “Incorporate the recovery and restoration of key physical processes, ecological functions, and native habitats and species to the flood management system where feasible.”
- **Improve Institutional Support**
  - The goal, as stated, only addresses the financial aspect of institutional support. This sounds like collecting fees.  
Response: This goal is intended to highlight that there are multiple agencies and entities involved in the system (county, city, state, reclamation districts, flood agencies), and that they should talk to each other and work together in the same direction with shared goals. This goal also addresses preparedness, recovery, and land use.
  - If you have proper land use, you don't need to pay fees.
  - Regarding structures, there needs to be a reevaluation of the process as a goal to make sure it works.
  - The wording between the Problem statement and the Goal statement should be made consistent. Currently, the Problem statement mentions management first, then funding; the Goals statements mentions funding first, then management.

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- **Promote Multi-Benefit Projects**
  - Consider changing the goal to read “Identify opportunities for multi-benefit projects that can be implemented and provide multiple water resource-related benefits.”
  - Projects that show they’re creating additional benefits will be more competitive.

### Development of CVFPP Objectives

Eric Clyde presented on the development of CVFPP Objectives, and introduced Worksheet #9: Develop Draft CVFPP Objectives. Mr. Clyde introduced the sample objectives in the worksheet and explained the meaning and significance of SMART (Specific, Measureable, Achievable, Relevant, Time-based) criteria. Mr. Clyde then invited work group members to comment and ask questions regarding the sample objectives.

Comment: For Sample Objective #2, the goal of my agency is the opposite of this statement.

Q: Does DWR know how much shaded riverine aquatic habitat we have today?

A: Surveys have been conducted on this topic, but they may not be up-to-date.

Comment2: Habitat projects have taken place on the San Joaquin, Merced and Tuolumne Rivers. These projects should be counted in the inventory. You have to know the baseline data in order to set a quantitative goal.

Comment3: You need to have a clear enough objective so you know whether you’re reaching it or not.

Comment: What are the key things to make an objective achievable? This should be considered with the “Achievable” consideration because otherwise we’re not getting any new information from this. Anything is achievable. Maybe we should describe what it takes to achieve it.

Response: Objectives will initially be written without knowing whether they’re achievable or not. Through the various iterations that will take place, the program team will remove the objectives that aren’t deemed to be achievable.

Comment: Have you considered the San Joaquin Valley Blueprint efforts in developing your background data? Every county has a Blueprint Plan, and it considers land use and roadways and how to protect people from risks. It is a guide for future growth. Water and flood control have not been included yet, but they will be incorporated in the future.

Comment: For Sample Objective #3, this refers to all urban and urbanizing areas in the entire valley. We should just be talking about just flood prone areas.

Work Group members were then divided into two groups and asked to develop draft Objective statements. Each group then reported back to the larger group with their results. The draft objectives that were developed are listed in Worksheet 9 at the end of this document. Since some of the objectives that were developed were worded as management actions, Work Group members will be asked to help revise the objectives to better meet the criteria.

### SharePoint Tutorial

Eric Clyde gave a tutorial presentation on the information available on the SharePoint site, and how to navigate the site. The purpose of the SharePoint is to provide members with access to documents, maps, calendars, notices relevant to the CVFPP development process.

### Valley-Wide Forum

Eric Clyde presented on the Valley-Wide Forum, which has been scheduled for February 3, 2010 at San Joaquin Delta Community College in Stockton.

Q: How are you doing outreach to inform the public about the forums?

A: DWR will likely be advertising in local newspapers and websites, and informing the agencies that are involved in the development of the CVFPP.

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Comment: The Director of the County Supervisors Association of California (CSAC) should be invited to the Forum. The League of California Cities should know about the Forum as well.

### **Action Item Review**

Ben Gettleman, Kearns & West, reviewed the action items for meeting #5.

### **Meeting Recap**

Pam Jones, meeting facilitator, reviewed the meeting #5 Goals and Objectives. Ms. Jones also noted that this Work Group is participating in the beginning part of the CVFPP development process, and that management actions would be developed in subsequent work groups. Lastly, Ms. Jones noted the group's request to have the program team use current data, and to coordinate with the efforts of the San Joaquin Valley Blueprint.

Comment: When the planning process arrives at the solutions phase, DWR should involve high level representatives from the Integrated Regional Water Management Plans (IRWMPs) in the work groups.

### **Adjourn**

Pam Jones and Roger Lee, DWR, thanked the work group members for their participation and adjourned the meeting.

# Worksheet 9: Develop Draft CVFPP Objectives

## INTRODUCTION

During previous sessions you have generated a great deal of information about the:

- Vision for success (Community Success Factors)
- Problems and opportunities
- Goals
- Principles

Objectives are being developed from the identified problems and opportunities, and goals. Some objectives may address or contribute to a single goal, while others may contribute to multiple goals.

Ideally, objectives should strive to identify a potential level of accomplishment that either individual management actions or combinations of management actions try to achieve. Collectively, objectives define what is intended to be accomplished by the CVFPP.

An objective should be framed in a way that makes it easy to determine whether it has been met or achieved; this will help the Plan Development Team (PDT) later to measure progress and determine the success of the 2012 CVFPP. Developing this level of specificity in an objective may require an iterative process; objectives are likely subject to (1) change as new information is developed during the planning process, and (2) continual re-evaluation for feasibility and for alignment with the CVFPP.

There are three parts to this exercise:

**Part I** – Discussing sample objectives to understand the structure of an objective.

**Part II** – Developing potential objectives for consideration in the 2012 CVFPP

**Part III** – Homework (other potential objectives for consideration in the 2012 CVFPP)



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### Worksheet 9: Develop Draft CVFPP Objectives

Draft Objective	Specific Is there enough specificity related to the resolution and scale of the objective (e.g., how big and over what terrain)?	Measurable Are the measures appropriate for the objective (metrics such as % pass rate for levees, # of acres)? Are there other, more effective ways to measure contributions?	Achievable Is the objective realistic? How do you determine whether it is achievable? If you can't, what needs to be done to develop that information?	Relevant Which goals the objective helps meet and how					Time-based What is the timeframe the objective covers (e.g., "by ____" date or timeframe such as monthly, annually, etc.)? And if there isn't one, how do you determine an appropriate one?	Notes
				CVFPP Goals						
				Improve Flood Risk Management	Simplify O&M of the Flood Management System	Restore Ecosystem Functions in the Flood Management System	Improve Institutional Support	Promote Multi-Benefit Projects		
<b>FLOOD RISK:</b> Provide 5,000 acre-feet of transitory storage (i.e., detention basin) to reduce peak flood events by 10% (?) and improve overall flood protection.	There are 3 ways to improve flood storage – transitory storage, build higher, improve levee protection.	-Provide X acre-feet of storage -Reduce X-X (range)-year (peak) event by X%	This would require identifying lands where to create this storage facility.	X				X	By 2025  Take lowest levee at what level it would be overtopped to determine range X to X-year event. EXAMPLE- You would want to do this as far up in the SJ River system as you could to provide for the greatest benefits. Below Gravelly Ford is a good area. The entire east side of the SJ River is most flood prone. The town of Firebaugh is a bit higher than the east side, but very flood prone. This could meet multi-objectives in that ag land would be protected.	
<b>FLOOD RISK:</b> Provide 100-year LOP (FEMA standard) for Firebaugh.	Specifically for Firebaugh	X-year level of protection		X				X	By 2025  If you don't go for 200-yr. LOP just because you aren't urban or "urbanizing", you may be losing out on getting funding for a project such as this in case area urbanizing in the future.	

Draft Objective	Specific Is there enough specificity related to the resolution and scale of the objective (e.g., how big and over what terrain)?	Measureable Are the measures appropriate for the objective (metrics such as % pass rate for levees, # of acres)? Are there other, more effective ways to measure contributions?	Achievable Is the objective realistic? How do you determine whether it is achievable? If you can't, what needs to be done to develop that information?	Relevant Which goals the objective helps meet and how					Time-based What is the timeframe the objective covers (e.g., "by ____" date or timeframe such as monthly, annually, etc.)? And if there isn't one, how do you determine an appropriate one?	Notes	
				CVFPP Goals							
				Improve Flood Risk Management	Simplify O&M of the Flood Management System	Restore Ecosystem Functions in the Flood Management System	Improve Institutional Support	Promote Multi-Benefit Projects			
<b>ECOSYSTEM:</b> Increase the floodplain and shaded riverine aquatic habitat within the flood management system (not outside of levee system) by X acres from Gravelly Ford to the Merced River confluence to support the recovery of managed species and salmon restoration goals of the San Joaquin River Restoration Program (SJRRP).	Upper SJ area (150 miles along river)-to provide enough habitat for the fish species. Floodplain within the flood management system.	X acres	Won't be feasible in all locations (ie. Urban areas or where land elevation is too high).	X		X			X	By 2025	
<b>OTHER WATER RESOURCES NEEDS:</b> Modify existing facilities or create new facilities that increase the ability to utilize X% more flood flows for groundwater recharge benefits. Areas that are flooded could also be used for recreation and open space when it is not flooded.		Utilize X% more flood flows for GW recharge		X					X	By 2050	EXAMPLE: Ash Slough contributes to SJ River – if we put a dual purpose facility upstream of Chowchilla, then we could use it for GW recharge. Madera County. WAYS TO DO THIS: Pre-release (before winter storms) water from reservoir...Increase conveyance capacity of Friant-Kern Canal to divert or store behind a dam to release for GW recharge.
<b>OPERATION, MAINTENANCE AND REPAIR:</b> Re-prioritize public safety over protection of environmental/species protection.											
<b>OPERATION, MAINTENANCE AND REPAIR:</b> Develop a system-wide, continuous, integrated group of responsible entities/agencies to oversee and coordinate flood protection, operations and maintenance.											

Draft Objective	Specific Is there enough specificity related to the resolution and scale of the objective (e.g., how big and over what terrain)?	Measurable Are the measures appropriate for the objective (metrics such as % pass rate for levees, # of acres)? Are there other, more effective ways to measure contributions?	Achievable Is the objective realistic? How do you determine whether it is achievable? If you can't, what needs to be done to develop that information?	Relevant Which goals the objective helps meet and how					Time-based What is the timeframe the objective covers (e.g., "by ____" date or timeframe such as monthly, annually, etc.)? And if there isn't one, how do you determine an appropriate one?	Notes
				CVFPP Goals						
				Improve Flood Risk Management	Simplify O&M of the Flood Management System	Restore Ecosystem Functions in the Flood Management System	Improve Institutional Support	Promote Multi-Benefit Projects		
<b>OPERATION, MAINTENANCE AND REPAIR:</b> Increase funding and personnel to accomplish O&M.										
<b>OPERATION, MAINTENANCE AND REPAIR:</b> Make environmental agencies co-responsible for public safety relative to flooding.										
<b>OPERATION, MAINTENANCE AND REPAIR:</b> Change regulations to make it easier to get routine maintenance permits to guarantee public safety (save time and money).										
<b>POLICY AND INSTITUTIONAL:</b> Develop a non-Habitat Conservation Plan (HCP) Valleywide system for the whole CVP region (string together existing O&M operations).	For example: Habitat conservation plan that allows for flood protection O&M.									
<b>POLICY AND INSTITUTIONAL:</b> Develop a land tax or other financial instrument to pay for those that need funding to meet the 200-year flood requirement, or request it.										