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Subject: Sacramento Co's Comments on the DSC's DLIS" NOP and Draft Principles
Date: Tuesday, June 16, 2015 3:35:21 PM

Cindy/Dustin:

Our floodplain manager, George Booth, and I have reviewed the Delta Levee Investment Strategy (DLIS) draft "principles" and Notice of Preparation (NOP). We want to provide you with our initial comments, with the caveat that we are continuing to review and analyze all available DLIS-related documents and will be providing additional written feedback. For example, we are particularly interested in reviewing and providing feedback on the forthcoming "risk assessment/asset value" maps due to be released later this summer.

For now please accept Sacramento County's initial comments and we look forward to additional engagement with Delta Stewardship Council (DSC) staff as this very important levee policy evaluation process continues to unfold:

NOP Comments

- To clarify, the "Proposed Project" is an update to the Delta Plan's Delta Levee Investment Strategy, which will be unveiled at the June 30th scoping meeting, just one day prior to the due date for comments on the NOP? If so, we will need more time to comment after we review and analyze "the Project".
- As you know, the statutory definition of "coequal goals" (Water Code section 85054) refers to the Delta as an "evolving place". Therefore to ensure the Delta's unique resources are protected for generations to come any new/revised policy statement should clearly acknowledge that the value of the Delta goes far being a water supply resource. Further, will the "Proposed Project" speak to what form the State foresees the "evolution" of the Delta (e.g., 50, 100, or 200 years hence)?
- Suggested additions to the three goals listed in the table on the bottom of page 5 of the NOP (and included on page 272 of the adopted Delta Plan):
 - Goal 1 suggests that there is a list of levee reaches that serve to protect freshwater aqueducts and the primary channels that carry fresh water through the Delta. Sacramento County staff would like the opportunity to see the list or map.
 - Goal 2, Protect Small Communities: The County suggests the DSC consider adding to the Levee Network description ... "and mitigate flood risk for small communities". It is not enough to only suggest "non-structural" mitigation measures (e.g., home elevation and non-residential flood-proofing), indeed the infrastructure should also be protected even if the levee system is not certified to 44CFR65.10

federal levee standards. Therefore, a strategy for protecting small communities in the Delta should include ring levees to protect the infrastructure; as well as, elevation or flood-proofing measures for buildings at risk of flooding.

- Goal 3, Protect Agriculture: The DSC should consider adding to the Levee Network description ...”and agri-business”
- Page 6 of the NOP second paragraph, mentions “levees of State interest” – the County would like to see a list or map of these levees and to learn what criteria has been used to determine the “State interest”.
- For your information, using grant monies provided by State DWR, Sacramento County is in the initial stages of developing a Delta Flood Emergency Action Plan (EAP). The planning effort (which should work alongside the subject policy planning process) will focus on:
 - Levee breach scenario mapping
 - Critical facilities
 - Flood preparedness
 - Flood warning
 - Evacuation and life safety
 - Recovery
 - Flood risk mitigation

Instead of drawing a distinction between federal project levees and those that are not project levees, might a more holistic system-wide analysis be appropriate in considering the value of each reach of levee in contributing to the coequal goals? Thus, there might be value in improving certain levee reaches beyond PL84-99 or Hazard Mitigation Plan level. The County’s Flood EAP workshops should yield a significant level of public thought to the subject Policy Plan. DSC staff and/or its consultants of the revised DLIS policy are highly encouraged to participate in the public meetings the County will hold in developing the Delta Flood EAP.

Draft Principles Comment

- Principle #11, “The Delta needs a Flood Control District”: It is important to explore the cost/benefit on a holistic Delta approach. The State cannot afford to leave the protection of critical infrastructure to the underfunded rural reclamation districts. If there is found to be local, state, or federal interest in a reach of levee, there should be a cost share mechanism to fund such a District that includes those interests.

Sacramento County looks forward to the release and review of future DLIS-related documents and maps. Should you have any follow-up questions about the above comments, please call or e-mail me.

Thank you,
Don

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