

**4444 West Undine Road
Stockton, CA 95206**

Delta Stewardship Council
980 Ninth Street Suite 1500
Sacramento, CA 95814

June 12, 2015

Members of the Council:

RE: Request for Comments on the “Delta Flood Management Investment Strategy Principles”
(Agenda Item 11, Attachment 5, May 28, 2015)

Please consider the following regarding the draft “Principles”:

Principle 1. “The goals of State law and the Delta Plan – and therefore, the Delta Levee Investment Strategy – are to better protect life, property, and State interests in the Delta.”

Principle 10. “Non-project levee proposals seeking state funding must prove they protect many people and/or assets or help achieve the co-equal goals. Landowners have no entitlement to State funding of repair, improvement, or maintenance of non-project levees.”

Principle #10 is in complete opposition to Principal #1. Without repair and maintenance, “non-project” levees will not contribute to better protecting life, property, and State interests in the Delta. (And there are many more miles of non-project than “project” levees.)

Principal #10 is justification for the State to turn its back upon most of the levee miles in the Delta – the “non-project” levees. This is counter-intuitive to all the State has been promulgating regarding the risk of seismic failure in the Delta. If the State fears the results of multiple levee failures due to seismic activity, it should also fear across-the-board disregard for maintenance of non-project levees. The result will be the same – catastrophic failure of the levee SYSTEM.

It does not further State interests to allow non-project levees to degrade, threatening land, production, homes and lives. The old saying is “penny-wise, and pound-foolish”. By sharing maintenance costs with Reclamation Districts and local agencies, the State increases the overall condition of the levee SYSTEM, and improves its chances of achieving the co-equal goals. **State cost-sharing in “repair, improvement, or maintenance” is in fact necessary for achieving Principle #1.**

Further: “Entitlement” is a misnomer. In this DLIS process, landowners seek not “entitlement”, but ask the process to correctly evaluate their lives and property (including residences).

Comments on DLIS “Principles”

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Principle 2. **“Stop urbanizing flood-prone land. Local governments and **reclamation districts** must stop urbanizing the Delta...”**

Principle 2 should be edited to remove “reclamation districts”. Reclamation districts do not “urbanize” – they maintain levees.

In closing:

Regarding “State Interests”...

Principle 1, Principle 4, and Principle 8 each use the term “State interests”, but the “principles” do not set forth the meaning of these words. Any list of “principles” should begin with a very clear definition of these terms. What are the “State interests”?

Thank you for the opportunity to comment.

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