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Via Email: [DLIS\\_NOP\\_comments@deltacouncil.ca.gov](mailto:DLIS_NOP_comments@deltacouncil.ca.gov)

RE: Delta Levee Investment Strategy Policy EIR

We are submitting the following comments regarding the Draft Environmental Impact Report for the Delta Levee Investment Strategy Policy (DLISP).

In public meetings regarding development of the DLISP, Council and consultant staff (Arcadis) have agreed that certain measurements/calculations of “Asset Categories” are incorrect. This is particularly true regarding “Landside Assets”, including counts of “Residential Buildings”. (For example, this category for Upper Roberts Island lists 17 such assets – the true number is more than 55. On Middle Roberts, the consultant count is 27, the actual is over 75.)

Further, Council staff has admitted that regarding the category “Geometry”, (covering “Total Levees (miles), PL 84-99 Levees (miles), etc.)...

“RD [Reclamation District] levee lengths to be likely more accurate than DWR’s, given the RD’s intimacy with their levee systems.” \*

If the overall goal of the delta Levee Investment Strategy is to advise state agencies as to what in the Delta needs to be protected by levees, then The Draft Environmental Impact Report must address how the Levee Investment Strategy will correct or mitigate for errors in such basic calculations.

Council and Staff have complained that it is difficult to find “consistent” ways to measure assets. This is not surprising, given the large physical area under planning. Therefore, ttThe DEIR must

1) address the methods of overcoming inconsistencies, such that the actual data finally used as the basis for planning decisions is accurate.

2) provide clear mitigation measures for actions taken with reliance upon faulty data.

Thank you for the opportunity to comment.

Rogene and Bill Reynolds  
South Delta Landowners

\*Communication dd June 5, 2015 from Cindy Messer, DEO-Planning