

## Summary of Comments

### Page 5

- Paragraph 1: This is safer because less likely to break than a specific link. However, to aid a reader, could link directly to DLIS: <https://deltacouncil.ca.gov/dlis/>
- Paragraph 2: Again, fine to use our website, but could update or include a second link for covered actions: <https://coveredactions.deltacouncil.ca.gov/>
- Paragraph 5: OPC currently updating this to a new, scenario-based approach. Depending on when the PSP is released, please check that OPC 2018 is still the most recent available.
- Paragraph 6: "Required"? vs "requested" in the first sentence.

### Page 6

- Paragraph 1: It's not clear why this statement is here. Is it because there are islands/levees on the priority list and map that aren't eligible for funding? Maybe say "Not all islands/levees identified on the priority list are eligible for funding." or similar.
- Paragraph 4: Consider adding a map or list of eligible islands/tracts based on 10,000AF of AAS. Adds clarity regarding eligibility.

### Page 7

- Section 5A, last bullet: This doesn't seem to square with the footnote that "descriptions may be limited to a discussion of elements/objectives".

### Page 8

- Second bullet: Should add a footnote or further discussion on defining "net benefit", that mitigation is not eligible, and what will be eligible as "habitat" (i.e., planting native grasses vs. riparian). If aligned with the PSP, it could also benefit from expanding this to both aquatic and associated species, i.e. riparian not just fish.
- Second bullet: How are "improvements" and "benefits" measured?
- Third bullet: Area? Also, consider a note on habitat quality or current function.
- Fourth bullet: How are "improvements" measured?
- Seventh bullet: This definition could be added above and help address an earlier comment.
- Eighth bullet: Note that this implies a certain level of detail for the project description. Are these typically completed at the level needed to support an Initial Study?

### Page 9

- First bullet: Maybe differentiate a bit more that the Appendix 7 information won't be used to assess the 50-point climate change scoring item. This is a little confusing until you get to the end in Appendix 7.

#### Page 11

- First paragraph link: Again, may be easier for applicant to have more direct link: <https://deltacouncil.ca.gov/dlis/>
- Second paragraph: Or "applicant's district must be responsible for an island/tract considered a Very-High priority for funding ..." or similar. The priority designations run with islands/tracts rather than districts.
- Third paragraph: See previous
- Fourth paragraph: See previous
- Fifth paragraph: Or "that is not located on a Very-High or High priority island or tract"

#### Page 15

- Under "Scoring Considerations": Could consider connectivity as well, e.g. either improving connectivity to nearby habitat and/or provide a refuge when there is no nearby habitat. This would be narrative only.
- Under "Scoring Considerations", second bullet: May want to add detail here. For example, "Quantity of the enhancement being propose. For example, area, linear extent, quantification of habitat type and function, or other relevant factors"
- Under "Scoring Considerations", third bullet: Consider clarifying for "negative" habitat impacts. For example, "Avoidance or minimization of negative habitat impacts to existing on-site or adjacent habitat or functions, that could reasonably occur as a result of the project"

#### Page 17

- Table 7 text under "Project Benefits": Suggest adding some rationale for why the time period chosen is "reasonable" and aligned with the climate change assessment in the preceding question.
- Table 7 text under "Project Maintenance...": Somewhat similar to the last question. Consider combining.

#### Page 19

- 8D: Specifically call out Delta Reform Act as well?
- Last paragraph, 8F: Change to Delta Levees Special Projects

#### Page 22

- Appendix 1, Second bullet: Cannot comment in box above, but consider this URL:  
<https://deltacouncil.ca.gov/dlis/>

Page 25

- Does this only cover activities outside of district direct discretion, i.e. critical maintenance, emergency response? Or, any activity? Is there a financial requirement that the District would need to cover partial costs to implement this again?

Page 31

- Not critical, but could consider adding a link to most recent OPC guidance, future inflow projections/modeling from DWR. Or, simply refer to the guide that follows. It could be helpful for the organization to have a point of reference on which to describe their capacity to address climate change.
- At #4: And/or adaptation strategy

Page 33

- Agree. I like the idea of having a climate change guide, similar to what OPR has prepared, but more centered on levees/water resources:  
[https://resources.ca.gov/CNRALegacyFiles/docs/climate/01APG\\_Planning\\_for\\_Adaptive\\_Communities.pdf](https://resources.ca.gov/CNRALegacyFiles/docs/climate/01APG_Planning_for_Adaptive_Communities.pdf). Perhaps the guide could be a separate resource, and the content here can be made more concise as a checklist to address, with some key resources included.