Comments on Draft
NBS Review
Prospectus

November 10, 2026

Delta Independent Science Board
715 P Street, 15-300, Sacramento, CA 95814

Dear Delta Independent Science Board,

On behalf of American Rivers and Restore the Delta, we appreciate the opportunity to comment on the *Draft Nature-Based Solutions for the Delta: A Prospectus for an Independent Science Board Review* (Prospectus). With the increase in more extreme weather events and loss of biodiversity, it is clear that nature-based solutions (NBS) present significant benefits to addressing growing environmental concerns in the Delta. With the NBS field rapidly evolving, we agree that it is important to take the time to analyze and eventually standardize NBS best practices. We believe that this review, along with the categorization of NBS in the Delta, is a great start to synthesize the available information, standardize NBS in the Delta, and find ways that organizations can work together to advance NBS in the region. After reviewing the Prospectus, we have comments on the following sections: R*eview Methodology* and P*revious Reviews and Relevant Efforts.*

Review methodology

Synthesize information about each type of action

American Rivers and Restore the Delta, with support from the Sacramento-San Joaquin Delta Conservancy, are currently communicating with the US Army Corps of Engineers (USACE) and the San Joaquin Area Flood Control Agency (SJAFCA) about exploring the use of NBS as part of the Lower San Joaquin River Project in Stockton. In these discussions, cost and implementation timelines play a large role in whether NBS can be feasibly implemented. In traditional cost-benefit analyses, co-benefits of NBS, especially social co-benefits, might not be accurately

captured. Therefore, we suggest the Delta ISB team synthesize and help standardize methods for analyzing the costs and benefits, including co-benefits, for each NBS category. These methods of analyzing costs and benefits would be helpful for organizations such as American Rivers and Restore the Delta to continue advocacy work for NBS.

Timeline for implementing NBS was also a large factor in our discussions for the Lower San Joaquin River Project. Therefore, we suggest that this review includes typical timelines of implementation for activities/categories. We also recommend weighing timelines against social co-benefits and broader environmental benefits to provide a holistic picture of NBS projects. Compiling a synthesis of potential barriers that affect timelines and how organizations and agencies have addressed them would further inform the Delta community on obstacles to NBS projects. For example, USACE has indicated pursuing a setback levee would extend the timeline an additional 2-4 years due to a deed restriction, which would thereby delay potential flood-risk benefits to the community. Although the potential social and environmental co-benefits of a setback levee are extensive, the shorter timeline makes the traditional alternative more appealing to project leaders. This has led our coalition to seek opportunities to hasten implementation of NBS.

We also recommend that practices for community outreach and feedback be included when synthesizing research. By including outreach strategies as part of the analysis, the Delta Stewardship Council can help standardize outreach as a part of the NBS process. The communities and tribes that will be affected need to have a voice in the evaluation and selection of NBS. As part of this, opportunities for Tribal co-management or co-governance when it comes to NBS development and selection should be considered, and this must include the exploration of funding mechanisms to ensure Tribes have capacity to participate.

Previous Reviews and Relevant Efforts

Approximately one third of the levees in the Delta are federal project levees. Therefore, we recommend considering the US Army Corps of Engineers' Engineering With Nature® (EWN) initiative as a relevant effort to advance nature based solutions in the Delta. EWN is defined as "the intentional alignment of natural and engineering processes to efficiently and sustainably deliver economic, environmental, and social benefits through collaboration". Led by the US Army Engineer Research and Development Center (ERDC), the EWN program maintains a website with extensive resources on applying NBS to flood risk management. ERDC has released, or plans to release, a series of Engineering Practice Guides, including the *Floodplain Benching Guide* (released), *Analysis of Potential Activities to Enhance Floodplain Connectivity* (expected December 2026), and *Best Practices for Vegetation Management on Levees* (expected

late 2026); translating these guides into formal engineering standards would help expedite their implementation on the ground.

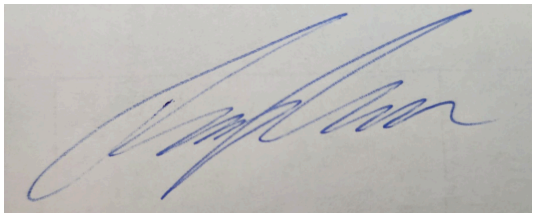
As stated previously, American Rivers and Restore the Delta are currently communicating with the USACE and SJAFCA about incorporating NBS into the Lower San Joaquin Levee Project in Stockton. As part of this work, American Rivers will be creating a nature-based solutions report that will summarize our research and efforts. We will reach out to the Delta ISB team with the report once it has been completed.

Conclusion

American Rivers and Restore the Delta appreciate the opportunity to review and comment on the Prospectus. Overall, we strongly support the Delta ISB's efforts to characterize NBS and advance the standardization of NBS practices.

Sincerely,





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