



# Delta Stewardship Council

A CALIFORNIA STATE AGENCY

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April 11, 2025

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

Delivered via [email]: [disb@deltacouncil.ca.gov](mailto:disb@deltacouncil.ca.gov)

## **RE: Delta Levees Investment Strategy and Clarksburg**

Dear Independent Science Board members:

I'm writing in response to recent comments offered to the Delta Independent Science Board regarding the Delta Stewardship Council's Delta Levees Investment Strategy (DLIS), which was adopted by the Council as a regulation effective January 1, 2024, and now included in the Delta Plan. Specifically, I would like to clarify how the DLIS prioritizes human life and safety relative to other criteria, and to clarify how the DLIS addresses Clarksburg.

### **DLIS Methodology and Priorities**

The Council developed DLIS based on a comprehensive methodology that quantifies risk by considering both the threats to Delta levees and the assets protected by those levees. Risk is defined as the product of the probability and the consequences of flooding. Building on the results of previous Delta levee planning efforts, the Council collected and used best available existing data and information from numerous sources to evaluate risks to State interests in the Delta. Risks to State interests were defined by the Council through a public process and include

public safety, property and infrastructure, water supply reliability, the Delta ecosystem, and the unique attributes of the Delta as an evolving place (prime agricultural farmland, Legacy Towns, and State highways).

The DLIS establishes a prioritization that guides State levee spending to the islands and tracts that pose the greatest risks to State interests. Given the increasingly limited financial resources for levee investments at the federal, state, and local levels, the DLIS prioritization recommends the most efficient use of those resources by identifying the most urgent risks and evaluating the benefits and trade-offs of risk reduction alternatives.

Islands and tracts were grouped into three categories based on their risk: Very-High Priority, High Priority, and Other Priority. **A Very-High Priority or High Priority island or tract is not a reflection of importance to the State, rather it is a measure of the risk that the island or tract carries given the state of the island or tract's levees.** The risk analysis methodology estimated the risks of flooding Delta islands and tracts using both the probability of levee failure caused by hydraulic flooding or seismic hazards, and the consequences of flooding to State interests (people, property, ecosystem, and water supply).

#### How the DLIS Prioritizes Human Life and Safety

**In keeping with a Council directive to rank risk to loss of life in the Delta as the most important consideration,** the DLIS team identified the islands and tracts that together comprise at least 90 percent of the total risk to life across the Delta. For the other risk metrics, the DLIS team identified the islands and tracts that together comprise at least 80 percent of the risk in each category.

Using a Decision Support Tool (DST), 31 islands characterized as having more than one State interest were included in the Very-High Priority category. Forty-five islands and tracts characterized as high risk to a single State interest were included in the High Priority category. The remaining islands and tracts were listed in the Other Priority category.

#### How the DLIS addresses Clarksburg

Clarksburg is located on Netherlands Tract (Reclamation District 999). It is listed as High Priority because its levee system is insufficient to protect prime agricultural land, State Route 84, and the legacy community of Clarksburg.

Re: Delta Levees Investment Strategy and Clarksburg  
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Over time, as Delta levees are improved, the risk posed to Delta islands and tracts will drop to a tolerable level and some islands will drop down from Very-High Priority or High Priority to Other Priority. This allows for other islands in the High Priority (like Netherlands Tract) or Other Priority category to rise to a higher priority. Future risk assessments will be conducted at the Council's discretion.

Thanks for considering these points. If you would like additional information regarding this topic, please contact Erin Mullin at [erin.mullin@deltacouncil.ca.gov](mailto:erin.mullin@deltacouncil.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Jeff Henderson", with a long horizontal flourish extending to the right.

Jeff Henderson  
Deputy Executive Officer – Planning and Performance Division