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From: Brian Keating [BKeating@placer.ca.gov]

Sent: Fri 4/23/2010 11:01 AM

To: DWR IRWM Grants

Cc: Ken Grehm; 'Rob Swartz'

Subject: Comments to Draft IRWM Grant Guidelines and PSPs

Attachments:

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Hello - please find our Flood Control District's comments to the Draft IRWM Stormwater Flood Management Grant PSP. We appreciate the opportunity to review and comment, and appreciate DWR's efforts to develop flood damage reduction cost benefit criteria which address the wide range of true costs and benefits associated with these multi-objective projects. As background, our District has prepared numerous prior grant applications with various Federal and State programs including DWR's Flood Corridor Program, the State Department of Conservation, and the federal NRCS and FEMA. Overall we find that the level of effort and detailed information required in this particular PSP exceeds any application package we have so far encountered. While some of the information can be developed in-house, many specific data requirements will mean the District must contract with a consulting firm, at its own expense, to appropriately respond to the PSP. We estimate that a grant application submittal under this PSP would be one of the most costly and time consuming we have yet prepared. Given the rather limited 20 million funding appropriation, 50% cost share requirement and likely competition from applicants across northern CA, we would need to seriously consider whether to apply.

Some specific comments:

- The requirements to analyze benefits under 3 storm events (rather than a single 100-year event, typically studied and available through FEMA) would require costly and time intensive HEC (or equivalent) type modeling efforts to determine areas affected by flooding in smaller events, as well as estimating their associated damages.
- Historical flood damage records for events smaller than the 100-year event are typically not tracked nor available, and to my knowledge, our County has one of the best data sources available on this subject, with little to no information below the 100-year event.
- Determining probability of failures for flood structures, by flood event, or by seismic event, would similarly require technical costly professional analysis. It's not clear what may define a flood structure.
- The process described for calculating EAD, as pointed out in the PSP, will require extensive modeling efforts likely requiring the use of a consultant.
- Under Part II, Item C please consider adding as an additional multiple benefit, "Recreational benefits/improved public access and use" as this benefit is not addressed yet is a typical and important component of multi-objective flood control projects.
- The PSP does not clearly address what stage of development a project must have achieved to be considered eligible. If only feasibility studies have been developed would a project be eligible?

Overall we would recommend DWR develop specific data requirements that can be generated with less effort from the applicant, but which also meet your objectives to define what the multiple benefits and costs are for a proposed project. We believe DWR's Flood Corridor Protection Program staff and experience could help in this regard and thanks again for the

opportunity to comment.

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