



**COUNTY OF PLACER**  
Community Development/ Resource Agency

**PLANNING  
SERVICES DIVISION**

Michael J. Johnson, AICP  
Agency Director

Paul Thompson, Deputy Director

**MEMORANDUM**

**TO:** Honorable Board of Supervisors  
**FROM:** Michael J. Johnson, Agency Director *MJ.*  
**DATE:** April 24, 2012  
**SUBJECT:** Central Valley Flood Protection Plan - Comment Letter

**ACTION REQUESTED:**

Authorize the Chair to sign a letter on behalf of the Board of Supervisors providing comments on the Central Valley Flood Management Planning Program which includes the Central Valley Flood Protection Plan (CVFPP) and the Urban Level of Flood Protection Criteria (ULFPC) and requesting a 30-day extension on the comment period.

**BACKGROUND:**

The California Department of Water Resources has recently released the draft CVFPP and related ULFPC and a Programmatic Environmental Impact Report for public review and comment. This memorandum is focused on providing comments on the CVFPP and ULFPC. The implementation of this program is intended to provide a 200-year level of protection in the Central Valley through the public investment of \$14-\$17 billion in infrastructure improvements over the next 20-25 years.

This program also seeks to insure that lands in the upper portion of the Sacramento River watershed address the potential impacts associated with communities that will grow where flood events occur. The boundaries of the Central Valley Flood Protection Act of 2008 include Placer County up to the Sierra Nevada Crest. The State will mandate that local ordinances and the General Plan must be updated. The General Plan will need to be updated within 2 years of adoption of the CVFPP (anticipated on July 1, 2012). Local ordinances must be updated within 3 years of adoption of the CVFPP. Once complete, the ordinance and policy/program updates will implement the CVFPP and ULFPC by providing a 200-year level flood protection standard in unincorporated Placer County.

The concern of staff is focused on the need for a more in depth assessment of the implications upon Placer County which has resulted in the request for a 30-day extension. The staff is also concerned that the State is mandating compliance with a new program but no technical data has been provided to support that effort. Consequently, it would be necessary for the County to develop that data at considerable expense and it will be necessary to require that data on a case-by-case basis of individual projects until such time that comprehensive data is available.

**FISCAL IMPACT:**

None at this time. However, the requirement to update the Placer County General Plan and local ordinances will require an allocation of staff to a one- to two-year effort to prepare the appropriate environmental documentation, to prepare the necessary ordinances, policies and programs, and to conduct public meetings and hearings. Additionally, it may be a requirement for the County or the Flood

Control District to fund a comprehensive effort to obtain the necessary technical data to implement a 200-year level of flood protection for all lands up to the Sierra Nevada Crest.

**RECOMMENDATION:**

Authorize the Chair to sign the attached letter requesting a 30-day extension and to consider comments from the County on the Central Valley Flood Protection Plan (CVFPP) and the Urban Level of Flood Protection Criteria (ULFPC) and requesting a 30-day extension on the comment period.

Attached to this report for the Board's information/consideration are:

**ATTACHMENTS:**

Letter to the Central Valley Flood Protection Board

cc: Ken Grehm – DPW  
Brian Keating – Placer County Flood Control and Water Conservation District  
Carl Walker, Roseville DPW

# County of Placer Board of Supervisors

175 FULWEILER AVENUE  
AUBURN, CALIFORNIA 95603  
530/889-4010 • FAX: 530/889-4009  
PLACER CO. TOLL FREE # 800-488-4308

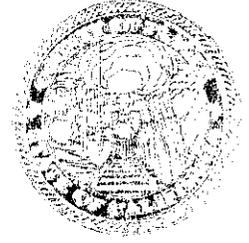
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District 1

ROBERT M. WEYGANDT  
District 2

JIM HOLMES  
District 3

KIRK UHLER  
District 4

JENNIFER MONTGOMERY  
District 5



April 24, 2012

Also sent via e-mail to attention: [cvfppcom@water.ca.gov](mailto:cvfppcom@water.ca.gov)

Ms. Nancy Moricz  
The Central Valley Flood Protection Board  
California Natural Resources Agency  
3310 El Camino Avenue, Room 151  
Sacramento, California 95821

**Subject: Central Valley Flood Protection Plan (CVFPP) and Public Draft Urban Level of Flood Protection Criteria (ULFPC)**

Dear Ms. Moricz:

Thank you for the opportunity to review the above referenced documents. Placer County covers a very geographically diverse area that stretches from the Central Valley, over the Sierra Nevada crest, to the Nevada State line, including parts of Lake Tahoe. The Placer County Community Development Resource Agency regulates the private land development projects in the unincorporated areas of Placer County, administers the advance planning work programs, and supervises the County's environmental review process.

In an effort to better understand these documents and how they may affect the citizens and businesses in the County, our development community, the County's capital improvement projects, and staffing needs and budget, we respectfully request a 30-day extension to the current comment periods for the various plans associated with the Central Valley Flood Management Program (CVFPP, and ULFPC).

Our staff recently received notice of these documents and deadlines, however we require more time to conduct a comprehensive review and provide you better feedback of this important program. In the event an extension is not provided, we offer the following general comments:

1. For Placer County to comply with the provisions of SB 5 regarding the 200-Year flood protection requirements, hydrologic and hydraulic information is needed well in advance of the mandated timeframes. Will the CVFPB be providing this information? If local agencies are required to produce this mapping, what source of funding is anticipated to be utilized and will the State offer grant programs to assist with funding? At a minimum, the following 200-Year event data would be necessary:

- Without-project and with-project design hydrographs and water surface profiles along any pertinent levied rivers (Bear River) and streams (both project and non-project systems).
  - Without-project and with-project floodplain maps.
  - Detailed identification of the Preferred Plan for System-wide Improvements that will provide urban and urbanizing areas 200-Year flood protection by 2025.
  - Detailed implementation plan for the Preferred Plan for System-wide Improvements that identifies all funding sources, in particular those available to the County.
2. Portions of the 200-Year flood protection plan depend on the completion of the major "System Improvements" as identified in the CVFPP. However, these improvements are under the control of State and Federal governments and will not likely be completed until after the 2015 mandate of SB 5. In the event this occurs, will Placer County be required to expend public funds to construct "interim" improvements that will ultimately be discarded once the "System Improvements" are completed?
  3. Figure 2-2 of the Draft CVFPP entitled "Urban Areas and Small Communities Included in Protect High Risk Communities Approach" does not include Placer County. Does that mean that the new levels of flood protection that apply to urban and urbanizing areas as defined in the Draft CVFPP and ULFPC do not apply to Placer County?
  4. Is there any available data of the hydraulic benefits DWR anticipates will be realized downstream within the State's Central Valley Planning Area corresponding with the change from the current 100-year level of flood protection to the new 200-Year urban level of flood protection? The hydraulic benefits would appear to be insignificant but should be verified and provided for our information.
  5. Does the new urban level of flood protection standard apply to proposed modifications or alterations to existing development within or associated with FEMA Special Flood Hazard Areas (SFHA), and specifically how these standards may apply. For instance, will a modification of a Use Permit or Subdivision application be a criterion for determining whether the new urban level of flood protection standard may or may not apply to existing entitlements (Vesting Tentative Map) or structures?

Thank you for your consideration of the request for an extension as well as the issues raised in this letter. We are prepared to work with you and your staff to successfully implement this program and provide the citizens of the State a high level of protection from catastrophic flood events.

Sincerely,

COUNTY OF PLACER

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Jennifer Montgomery, Chairwoman  
Supervisor District 5  
Placer County Board of Supervisors

cc: Board of Supervisors  
Holly L. Heinzen, Interim County Executive Officer  
Ken Grehm, Director of Public Works  
Brian Keating, Placer County Flood Control  
Carl Walker, Roseville DPW

