



September 2, 2014

Kelly Fucciolo  
Department of Water Resources  
3464 El Camino Avenue, Suite 200  
Sacramento, CA 95821

RE: Draft Urban Flood Risk Reduction (UFRR) Program Guidelines and Proposal Solicitation Package

Dear Kelly Fucciolo:

Thank you for the opportunity to comment on the Department of Water Resources (DWR) Urban Flood Risk Reduction (UFRR) Program Guidelines and Proposal Solicitation Package (PSP). On behalf of the Rural County Representatives of California (RCRC), we look forward to having regional flood damage reduction projects located within our member counties being successfully funded through the Disaster Preparedness and Flood Prevention Bond Act of 2006 (Proposition 1E). RCRC is comprised of 34 counties throughout the state; of which 11 are located within areas protected by the State Plan of Flood Control (SPFC) in the Sacramento-San Joaquin Valley and do contain some urban or urbanizing areas. We offer the following comments.

The six Regional Flood Management Plans (RFMPs) are either complete or soon to be completed. It is unclear how the Basin Plan requirement for application fits into the regional planning process. The Basin Plans should be coordinated and consistent with the RFMPs. Both the Guidelines and the PSP should include a clear explanation of the relationships between the Central Valley Flood Protection Plan (CVFPP), the RFMPs, and the Basin Plans.

Additionally, we recommend that each of the six RFMP areas be allocated a proportion of the available moneys. If acceptable projects are not received within the required deadlines, then the money could be reallocated into the other regions.

On page 1-3 the guidelines indicate “repairing erosion sites and removing sediment from channels or bypasses” are authorized under Proposition 1E; however on page 4-4 it states that routine maintenance of an existing facility, “including repair of

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erosion damage and removal of sediment from channels and bypasses' is an ineligible project. What is considered routine maintenance when it is applied to repair of erosion damage and removal of sediment from channels and bypasses? Is there a monetary cap?

On pages 5-1 and 5-7 the guidelines state that the State supports investing in "no-regrets" projects and programs. The term "no-regrets" is not defined or included in the definition section.

With respect to the PSP, the anticipated schedule has the concept proposals due by September 16, 2014. This seems like a very short time frame given the comments on the draft were not due until September 2<sup>nd</sup>. We request that this deadline be postponed at least 30 days after the Guidelines are adopted.

We again thank you for this opportunity to comment on the draft UFRR Program Guidelines and PSP. Please contact me at (916) 447-4806 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is written in a cursive style with a large, looped initial "M".

Mary Pitto  
Regulatory Affairs Advocate