

DEPARTMENT OF WATER RESOURCES

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MAR 20 2008

TO: Federal Flood Control Project Maintaining Agencies
Fall 2007 Levee Inspection Results

Over the last two years, the Department of Water Resources (DWR) has increased and improved its inspection activities to bring the DWR inspection program into closer compliance with the expectations of the U.S. Army Corps of Engineers (Corps) National Levee Safety Program. DWR completed the fall 2007 inspections in December, and enclosed are the Levee Mile Report, Unit Cover Sheet(s), and the Levee Maintaining Agencies (LMAs) Cover Sheet for your entire district. DWR used the Corps' updated Flood Damage Reduction System Inspection Report Checklist to evaluate the level of maintenance for all categories except for trees, other vegetation, and certain encroachments.

The Corps issued a draft final White Paper (hereafter White Paper) dated April 20, 2007, entitled *Treatment of Vegetation within Local Flood-Damage Reduction Systems*, which allows the existence of only short grass on levees. Most LMAs would have had difficulty meeting the White Paper requirements, and those failing to do so would have been rated as Unacceptable. Therefore, DWR established and applied interim criteria that require trees and other vegetation to be trimmed and thinned to allow open visibility and access on the landside levee slope and 10-foot toe easement, the crown, and the top 20 feet of the waterside slope. These criteria are depicted in the enclosed *DWR Vegetation Inspection Criteria for Standard Levees, October 2007*. In response to the White Paper, DWR has prepared a draft Vegetation Management Plan proposing application of the above visibility and access requirements while a comprehensive, system-wide plan for evaluating and upgrading all aspects of the levee system is developed. Each levee maintaining agency is responsible for satisfying all environmental and resource agency requirements or laws that apply to the removal of vegetation.

Previously, overall ratings for each unit and LMA were determined by the inspector's impression of the overall maintenance effort. To improve objectivity and consistency, DWR has developed and implemented a new method to determine overall ratings. Each maintenance deficiency is given a rating of M (Minimally Acceptable) or U (Unacceptable), and the location and length of the deficiency is recorded. The total length of all M entries in a unit is calculated and divided by the unit length to obtain a percentage of total unit miles rated as M, which we refer to as a mileage rating percentage. The same is done for U entries. The percentage of total LMA miles rated as M or U is calculated in the same manner. These total percentages are then compared to thresholds established by DWR to determine the unit's overall rating. Because 12 major maintenance categories are considered, most of which cover both landside and waterside slopes, overall mileage rating percentages in excess of 100% are possible. We have enclosed explanations of this rating method and a table for each unit that shows the number of miles of M and U and percentage of unit length within each rating category.

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Had the Corps' White Paper criteria been applied, we estimate that 103 of the 107 LMAs would have received Unacceptable ratings for fall 2007. With the application of the interim vegetation criteria and new overall rating method, 64 (of 107 total) LMAs received Unacceptable ratings in fall 2007. The Corps has proposed that LMAs failing to meet its vegetation criteria should be rated Unacceptable but that they would remain active for PL 84-99 rehabilitation eligibility in the interim. DWR does not determine PL 84-99 status of those LMAs rated Unacceptable in this DWR inspection.

The Corps, DWR, and the Central Valley Flood Protection Board are focusing greater attention on encroachments. DWR documented and rated three types of encroachments in fall 2007. Two of the types were rated as M or U: those that threaten levee integrity; and those that have no business on the levee, such as trash, prunings, abandoned equipment, etc. These encroachments are included in the mileage rating percentages, affect overall ratings, and should be addressed.

DWR also documented a third type of encroachment that the Corps has identified as unacceptable in some of their Quality Assurance inspections, but that may be beyond the current authority of the LMAs to correct or remove. DWR inspectors recorded the location and length of encroachments that obstruct visibility and access in the same manner as thick vegetation and rated them as Partially Obstructing (PO) or Completely Obstructing (CO). For example, an open fence at the levee toe should not be documented but the same fence covered in vegetation or a solid board fence should be documented. These PO and CO encroachments do not currently affect overall ratings. DWR is actively working with the Central Valley Flood Protection Board and the Corps on this issue.

As you know, the Code of Federal Regulations (33 CFR 208.10) requires four flood control project inspections per year. The spring and fall inspections are conducted by DWR; the summer and winter inspections are conducted by the LMAs. This is a reminder that you are responsible for completing the winter inspection cycle, which is December through February, and for returning your signed Unit Cover Sheet(s) to DWR by April 4, 2008. Each Unit Cover Sheet contains two checkboxes that you must use to report on the winter condition of that unit. It is acceptable if your inspection took place during the winter inspection period of December through February or within the last 30 days, as indicated in the checkbox narratives. Copy the Unit Cover Sheets, check the appropriate box and add any pertinent information, and sign and return the sheets to us by April 4, 2008, at:

DWR Winter Inspection Reports
3310 El Camino Avenue Room LL-30
Sacramento, California 95821-9000

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If you have any questions about the criteria or methods employed in completing the fall 2007 inspections, please contact your fall 2007 inspector, who is identified on your Unit Cover Sheets. Phone numbers are listed below.

Sincerely,



Jim Eckman, Chief
Flood Project Inspection Section

Enclosures

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