

DEPARTMENT OF NATURAL RESOURCES
AND CONSERVATION

WATER RESOURCES DIVISION • 1424 Ninth Avenue, Helena, MT 59601
(406) 444-6601 Telefax (406) 444-0533



BRIAN SCHWEITZER, GOVERNOR

STATE OF MONTANA

DIRECTOR'S OFFICE (406) 444-2074
FAX: (406) 444-2684

PO BOX 201601
HELENA, MONTANA 59620-1601

Ruby Valley Conservation District
PO Box 295
402 S. Main St.
Sheridan, MT 59749-0295

May 10, 2012

RE: Crucial state need for RDGP application "Upper Missouri Headwaters River/Flood Map Development".

As Bureau Chief of the DNRC Water Operation's Bureau, my duties include overseeing the state's floodplain management program. The Montana DNRC Floodplain Management Program promotes common sense planning for development in flood prone areas through education for the benefit of public health, safety and welfare.

To that end, I am in strong support of the Ruby Valley Conservation District RDGP grant application titled "Upper Missouri Headwaters River/Flood Map Development" and support the project as a crucial state need for the following six reasons:

First, this project focuses on the synergy of developing comprehensive river hazard maps for local government and landowners in six major watersheds in the Upper Missouri headwaters. Comprehensive and accurate maps will allow these Montanans to understand and better prepare for their river hazards, including risk from flooding, erosion, and ice jams. The channel migration maps, flood scoping, and outreach will help Montana citizens understand and reduce their river hazard risk and minimize flood loss. I support a locally driven project of this scope to assist local governments and citizen with their land use planning and decision making.

Second, protecting public health, safety, and welfare are the key goals of Montana's Floodplain Management Act. Having accurate, complete information is crucial to meet these goals. Channel migration mapping addresses a different type of hazard than floodplain mapping, and each is made more powerful by having the other hazard also identified to help keep people out of danger from all river hazards.

As witnessed from the devastating floods of 2011, the impact of flooding and erosion is a major economic loss and disrupts lives, livelihoods, and public infrastructure. The information generated from this project will better protect flood-prone communities, homes, and businesses. Erosion impacts from the flooding included siltation of agriculture lands from excessive channel erosion, damaged and abandoned irrigation infrastructure as the river cut new channels leaving other channels dry, erosion and scour around road bridges, and other public and private infrastructure.

Montana was not alone in experiencing 2011 flood loss and there seems to be a growing increase in weather related flood damages. Recent testimony before the U.S. Committee on Banking, Housing and Urban Affairs Subcommittee on Economic Policy regarding the National Flood Insurance Program stated that in the first decade of the new millennium, floods and flood damage associated with extreme rainfall events have increased, with damages rising from \$6 billion to \$10 billion over this time period, despite the billions of dollars invested in flood control. In 2011 alone, there were 58 Federal flood disaster declarations, covering 33 different states. These trends all speak to the need to decrease risk and provide comprehensive river hazard information to Montana communities. There simply is not enough federal money to accommodate all the mapping and information needs in Montana. Developing this information is a crucial state need.

Third, this project sequences floodplain and channel migration mapping efforts so that the timing of mapping rivers for both hazards is coordinated. In this way it leverages resources from the grant program, local governments, FEMA and others. It identifies an efficient process of public outreach and involvement, comprehensively informing citizens and local government officials of riverine hazards. Providing scientifically-sound data and information related to flood risk, land use, and natural resources is essential to communicating the actual flood risk to people and properties. This project is an efficient use of funding.

Fourth, the channel migration mapping focus area of the upper Missouri headwater rivers is in line with the first and second priorities in the State of Montana RiskMAP Business Plan, prepared by DNRC for the Federal Emergency Management Agency, United States Department of Homeland Security, April 2012. DNRC surveyed Montana communities statewide and ranked those community mapping priorities as follows:

First priority: Gallatin County / City of Bozeman, including 35 miles of the Gallatin River (unmapped area and development pressures) and 19 miles of the West Gallatin River (re-mapping needed due to vast stream migration and development) .

Second priority: watersheds include the Jefferson River, Big Hole River, Ruby River, and Madison River, scoping is needed for some of the areas that have not previously been scoped.

Fifth, the Montana Disaster and Emergency Services August 2007 update to the State of Montana Multi-Hazard Mitigation Plan and Statewide Hazard Assessment supports the type of information generated from this project as a means to reduce hazard risk. It states that during the 20th century, floods were the number-one natural disaster in the United States in terms of the number of lives lost and property damage. From 1974 to 2006, Montana incurred about \$24 million in Federal and over \$5.5 million in State assistance for damage to public structures and infrastructure or about \$1 million per year. In the Hazard Risk Map of flooding, of the six counties involved in this project, four are identified as high hazard in their local pre-disaster mitigation plans (Jefferson, Beaverhead, Madison and Deer Lodge), while the other two are identified as medium risk (Silver Bow and Gallatin).

Finally, as described under the general provisions of Montana Code Annotated, Title 76: Land Resource and Use, Chapter 5: flood plain and floodway management, the following sections of state law are directly supported by the RVCD grant application project, especially in regards to public health, safety, and welfare:

76-5-101. Findings. The people of the state of Montana find that:

(1) recurrent flooding of a portion of the state's land resources causes loss of life, damage to property, disruption of commerce and governmental services, and unsanitary conditions; all of which are detrimental to the health, safety, welfare, and property of the

occupants of flooded lands and the people of this state; and

(2) the public interest necessitates management and regulation of flood-prone lands and waters in a manner consistent with sound land and water use management practices which will prevent and alleviate flooding threats to life and health and reduce private and public economic losses.

76-5-102. Policy and purposes.

(1) The policy and purposes of parts 1 through 4 of this chapter are to:

(a) guide development of the floodway areas of this state consistent with the enumerated findings;

(b) recognize the right and need of watercourses to periodically carry more than the normal flow of water;

(c) provide state coordination and technical assistance to local units in management of floodway areas;

(d) coordinate federal, state, and local management activities for floodway areas;

(e) encourage local governmental units to manage flood-prone lands, including the adoption, enforcement, and administration of land use regulations; and

(f) provide the department of natural resources and conservation with authority necessary to carry out a comprehensive floodway management program for the state.

(2) Specifically, it is the purpose of parts 1 through 4 to:

(a) restrict or prohibit uses that are dangerous to health or safety of property in times of flood or that cause increased flood heights or velocities;

(b) require that uses vulnerable to floods, including public facilities that serve the uses, be provided with flood protection at the time of initial construction;

(c) develop and provide information to identify lands that are unsuited for certain development purposes because of flood hazard;

(d) distinguish between the land use regulations applied to the designated floodway and those applied to that portion of the designated flood plain not contained within the designated floodway;

(e) apply more restrictive land use regulations within the designated floodway;

(f) ensure that regulations and minimum standards adopted under parts 1 through 4, insofar as possible, balance the greatest public good with the least private injury.

Thank you for submitting this RDGP application to address this crucial state need. The DNRC Floodplain Management Section anticipates serving on the Technical Working Committee and looks forward to working with you and others to ensure a successful project.

Sincerely,


Laurence Siroky, Bureau Chief
Water Operations Bureau