

EXTRACTS OF USACE MAY 23, 2007 COMMENTS

The assumption that the 23 large watershed's 100-year flows can be added together to produce the 100-year Delta flow is invalid.

The assumption that failures in a levee system will not significantly reduce stage elevations along channel is questionable.

Annual mean number for seismic levee failures is 3.41 341 failures per 100 years which is 341 more than observed in the past 100+ years Surely, these numbers cannot be credible results.

The average of 7.35 flood failures per year is three times the (undocumented) 2.60 number and nearly 6 times the observed flood failure rate from 1950 to 2006. Thus, as with the seismic failure number above, this flood number simply appears way outside the bounds of credibility.

Return periods of 2.7 or 5 years for many levees just seem incorrect and incompatible with decades of recent data.

Overall, the seismic fragilities simply appear unrealistic - with far too many breaks to be credible.

Figure 6-40 implies that for a M 7.5 event this type of levee has a 10% chance of displacing 1.0 ft. at all PGAs > 0.10. This seems Really Extreme.

Conclusion that 40% of historical failures (2.6) are from through seepage results in over 1.0 per year is different than historical rate and needs to be explained.

At first glance, the calculated annual number of failures is, to be polite, "extraordinary" albeit not as extreme as the seismic results above.

The estimated 30 or more island breaches in the next 25 years due to flood events seem too high/pessimistic.

The BAU assumption that levee crest elevations will not be raised in response to increased tidal and flood elevations is not realistic.

1 ft easy, 3 ft maybe doable for 100 years of effort.