

**Billiou Farming Company**

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Rebecca Fris  
Ecosystem Restoration Program  
California Bay Delta Authority  
650 Capitol Mall, 5th Floor  
Sacramento, CA 95814

July 26, 2005

Re: Comment- Chico Landing Subreach Restoration Project

Rebecca,

Because the Capay Unit of this restoration project is so tightly integrated with the Hamilton City Ecosystem Restoration and Flood Damage Reduction Project, I must express concern that the EIR did not address the Restoration Project obligation to pass a substantial amount of floodwater in order to have the overall project succeed. To begin restoration, in a standalone manner, seems hasty and perhaps unwise.

F-1

To reiterate my verbal comment, a few variables remain in the successful completion of the HC Project design. They are all related to floodwater elevation changes, and they are adjacent to the Capay Unit, south of County Road 23. Those are - the physical placement and height of the new levees, and the ability to pass the water through the restored areas. The physical location for the levee has been previously negotiated, and is not likely to change. This leaves the levee height and the roughness coefficient of the restored areas. These were intended to be manipulated during HC's PED, in order to effect the protection that the southern farmlands require in supporting the project. We need to keep the flexibility to fit the restoration project into the larger plan, and it really shouldn't go forward until the HC Project has a chance to integrate it.

Another example of the need for serious coordination between the Projects is the fence issue. During the HC Project's EIR process, the absolute need for a tall fence on the entire landside of the restoration lands was demonstrated and found to be a necessary part of the project, in order to adequately protect existing ranches from the expected animal and human incursion onto private lands. It's now part of the HC Project.

F-2

I did not see any discussion of this fence at your meeting. Since it will be the habitat restoration that brings more animals and people, not the levee itself, it would seem incumbent upon the Restoration Project to adequately address these impacts and how the design will mitigate them.

Finally, I must express an objection to the finding that the Project causing the (high flow) increase in elevation of up to one foot, is "less than significant". It certainly is on my ranch, where this change will flood several hundred more acres of my land, which currently do not flood. We are already subject to frequent medium, and low flooding due to a previous DFG environmental project allowing an upstream levee failure. Your project will bring new water onto my ranch during low and medium stage events. Perhaps an explanation of the "findings" process would help me out.

F-3

As far as the Capay part of the Project is concerned, you have a great start. Let's not put the cart before the horse. Keep our flexibility and our good relations between the community of Hamilton City, our local farmers and ranchers, and the environmental folks that have all worked so hard. The Hamilton City Project is tasked with serving many varied interests. So far, it is working very, very well. That's because of the coordination and consultation with the locals. Let's keep it going.

F-4

Sincerely,



Michael Billiou  
Landowner and Neighbor  
(530) 826-3657

**Response F-1** The Hamilton City Ecosystem Restoration and Flood Damage Reduction Project (Hamilton City Project) has not yet been approved; therefore, it is not considered part of the baseline conditions for this project. Because of its location relative to the proposed project sites, the Hamilton City Project was considered by TNC in the planning and design of the proposed project. Similar to the hydraulic modeling of the USFWS SRNWR restoration sites used for analysis in this EIR, the Hamilton City Project modeling and EIR findings were considered by TNC in the planning and design of the proposed project. Moreover, the hydrologic modeling conducted for the Hamilton City Project included assumptions that the riparian restoration activities anticipated for SRNWR properties would occur, including the three properties that are part of the proposed project analyzed in the Draft EIR. While not relevant to the proposed project, it is worth noting that the modeling results for the Hamilton City Project indicated that hydrologic and river stage changes under flood flow conditions would be similarly small, like those determined for this proposed project that have been analyzed in the Draft EIR.

The proposed project and the Hamilton City Project are two separate projects. Regardless, CBDA is committed to ensuring that all projects are coordinated along the Sacramento River, including the Hamilton City Project and the proposed project. In addition, the proposed Hamilton City Project was identified in Section 5.1 of the Draft EIR, “Cumulative Effects of Proposed and Similar Projects Planned within the Study Area,” as a similar project that is planned to occur in the study area in the reasonably foreseeable future. A discussion of cumulative effects related to flooding is provided under Section 5.1.2, “Cumulative Effects to Hydrology, Water Quality, and River Geomorphology.” In that section, the Draft EIR provides a brief description of the proposed Hamilton City Project, including several levee improvement alternatives and restoration of riparian habitat along the upper Sacramento River (U.S. Army Corps of Engineers [USACE] et al. 2004). The section also provides an analysis of cumulative effects of the combined projects based on two-dimensional hydraulic modeling (Ayres 2002).

The hydraulic modeling used in the analysis associated with the proposed Hamilton City Project had assumed several SRNWR units to be restored, for modeling purposes, including those proposed by TNC. The Draft EIR acknowledges that the modeling demonstrates the potential for cumulative hydraulic effects to result from the restoration of SRNWR units that are near one another, and that while each unit’s effects are localized, vegetation changes at individual units can combine to alter flow patterns and speeds (Ayres 2001 and 2002). However, the modeling conducted for the proposed Hamilton City Project study indicated that the combined effects of planned changes in vegetation at the SRNWR units that are near one another (i.e., Dead Man’s Reach, Capay, and Pine Creek Units) would not create substantial adverse effects (Ayres 2002).

The commenter indicates that the proposed project has an obligation to pass a substantial amount of floodwater in order to have both projects succeed (i.e., the proposed project and the Hamilton City Project). Modeling runs for all of the Hamilton City Project levee alternatives assumed restoration of the SRNWR units. The proposed project reflects a site-specific analysis of three of the restoration properties evaluated in previous modeling runs for the SRNWR and the Hamilton City Project. Thus, the modeling assumptions and results presented in the Draft EIR are consistent with other existing modeling results and projects. As stated above, the Hamilton City Project study indicated that restored SRNWR units, including those in the proposed project, would not create substantial adverse effects with the amount of floodwater they would pass.

- Response F-2** As mentioned in Response F-1, the Hamilton City Project and the proposed project are separate. Commitments made between the Billiou Farming Company and USACE, The Reclamation Board, and/or others to provide and install a wildlife fence as part of the proposed Hamilton City Project, do not apply to this proposed project. The proposed project reflects a site-specific analysis of three of the restoration properties evaluated in previous modeling runs for the SRNWR and the Hamilton City Project. Thus, the modeling assumptions and results presented in the Draft EIR are consistent with other existing modeling results and projects.
- Response F-3** As noted in Response E-1, the hydraulic modeling shows incremental stage increases at the design/modeled flood flow conditions compared to existing conditions. Known stage recession relationships for the Sacramento River indicate that the additional stage does not translate into a substantial change in the duration of flooding as these high flow events, and all lower stage flow events only remain out of the normal channel for periods of up to several days. Because existing land uses in similar conditions have demonstrated experience at withstanding similar inundation during flood events, the project-related incremental changes were determined to result in less than significant effects.
- Response F-4** This comment does not provide any information that would suggest the impact conclusions are unaddressed or incorrect in the Draft EIR. As noted in the response to comment E-2, TNC and the SRNWR are committed to working with and addressing stakeholders' (including adjacent landowners') concerns through on-site meetings, modification of restoration plans, and/or modification of restoration implementation strategies. Additionally, TNC and SRNWR are committed to SRCAF Board Policy #2 - Good Neighbor Policy Actions 1 & 2 (see response to comment E-2 and Appendix B for additional details).