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Subject: Comments on the Draft EIR for the Sacramento River
Dead Man's Reach Habitat Restoration Program

After looking through the Draft EIR for the proposal at Dead Man's Reach, it is difficult for an "Interested Party" to believe that any existing riparian vegetation over a few tens of years in age could have existed at the site prior to the initial clearing and planting, or that the proposal for restoration of riparian vegetation on the site will have any long term success. Rather it is easier to believe that the river bank will continue to erode and repeated heavy flooding of the site will occur and the expense and effort put forth in the proposed clearing, stump removal, stick picking, tilling, leveling, irrigation system installation, planting, weed control and any unspecified bank erosion control measures, will be consumed by an advancing dynamic river channel meander system.

G-1

Exhibit 3-5 shows the Dead Man's Reach site as having a walnut orchard to the west and southwest of the project which contains arcuate vegetation patterns that are relics of old filled in river channels and sloughs. On the east and northeastern side of the project more recent abandoned river channels and sloughs now exist. The northern end of the project consists of a stretch of river bank approximately 1,000 feet in length, which is undergoing erosion along this outside curve of the river channel. The Koehnen's report a loss of ten acres from this area due to erosion of the river bank during recent years. In the vegetation at the southern end of the project area, out wash patterns can be seen which drain into the Butte Basin Overflow Area.

G-2

Impact 4.3-b This paragraph concludes that any change in the rate of channel scouring and meander migration as the result of the program will be "**less than significant**", also stating that: proposed increases in vegetation densities on the floodplain are relatively small and are not expected to alter the way the system is now functioning in this "dynamic meandering river." It is further stated that channel scour and bank erosion occur at bankfull stage elevations and since the project is located at elevations above the bankfull stage, any impacts derived from the project will be reduced. The paragraph reiterates that although the restoration of a native riparian habitat will be beneficial, any changes to geomorphic processes will be less than significant.

G-3

The paragraph in Impact 4.3b, concerns itself with off-site impacts and ignores impacts that can be expected to occur to capital expenditures within the site itself. It appears that the proposed Dead Man's Reach Habitat Restoration Program lies directly on an active river channel meander system and is within the Butte Basin Overflow Area. The proposed habitat restoration will be less than significant in stabilizing the site and bank erosion and overflow flood channeling can be expected to continue.


The Koehnen family are long time residents of the area and are known to be successful farmers who are wise to the ways of the river. Even though the site is described as above river bankfull stage elevation, it is not above flood stage elevation. The loss of ten acres of land to river bank erosion probably represents the loss of a triangular shaped piece of land measuring 900 feet or more on a side located at the north eastern corner of the site. The loss of trees to “blow down” is not uncommon to almond farmers, however the prospect of continued and increasing loss of trees and land to an uncontrollable river is unacceptable. The main reason for the Koehnen’s willingness to sell the property is most likely the prospect of capital losses due to continued erosion and flooding of the property.

G-4

Although currently the general trend is for a western migration of the river, the river at the Dead Man’s Reach site is bounded on the westside by high banks and on the eastside by the Butte Basin Overflow Area. The migration of the river in this area can be expected to be toward the east thereby subjecting the Dead Man’s Reach area to heavy flooding, severe bank erosion and eventual channel realignment through the site.

In the opinion of this “Interested Party,” the probability is high that the proposed rehabilitation program at Dead Man’s Reach will result in a negative Cost/Benefit Ratio and that Capital Assets obtained through the expenditure of taxpayer backed funds for land purchase, planning, labor and materials will be left scattered in a melange of sloughs and abandoned channels soon to be formed by a “dynamic” river channel meander system. It is recommended that a Passive Habitat Restoration Program be persued for the Dead Man’s Reach Habitat Restoration Program.

G-5



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- Response G-1** The comment is noted. This comment does not raise significant environmental points that would affect the adequacy of the EIR. Muting or decreasing geomorphic processes including meander migration of the Sacramento River is not a project objective. While it is possible that the river bank will continue to erode, this project does not prevent or impede efforts by others to maintain components of the site, including bank stabilization.
- Response G-2** This comment does not raise significant environmental points that would affect the adequacy of the EIR. The comment characterizes vegetation patterns and geomorphic features, including areas undergoing erosion, depicted in Exhibit 3-5.
- Response G-3** This comment does not raise significant environmental points that would affect the adequacy of the EIR. As noted in Response G-1, muting or decreasing geomorphic processes including meander migration of the Sacramento River and/or stabilizing the site or eliminating flooding are not project objectives. While it is possible that the river bank will continue to erode, this project does not prevent or impede efforts by others to maintain components of the site, including bank stabilization. Additionally, the site currently floods on a relatively routine basis and this project is not intended to change the frequency, magnitude, or duration of these naturally occurring events.
- Response G-4** This comment describes historical loss of land and trees resulting from erosion and blow down, and states that the loss of trees to blow down is not uncommon. As described in Responses G-1 and G-3, muting or decreasing geomorphic processes including meander migration of the Sacramento River and/or stabilizing the site or eliminating flooding are not project objectives. While it is possible that the river bank will continue to erode, this project does not prevent or impede efforts by others to continue bank stabilization efforts. Loss of trees resulting from blow down may continue to occur; however, increases are not expected.

With respect to the comment regarding the predicted meander migration direction at the Dead Man’s Reach site, the commenter is referred to Section 4.3, “Hydrology, Water Quality, and River Geomorphology,” and Impact 4.3-b. Geomorphic processes that dictate meander migration are complex and are influenced by multiple local, upstream, and downstream factors including channel scouring, bank stabilization efforts, migration in other locations, sediment transport and deposition, and changing flow regimes. Because hydraulic modeling used in the analysis indicates that changes in velocities associated with restoration of the proposed properties would be too small and localized to substantially alter existing channel hydraulics or lead to erosive forces that could substantially affect this already dynamic river system, changes in geomorphic processes resulting from the proposed project are expected to be less than significant.

- Response G-5** The comment is noted. The opinion expressed in the comment does not raise significant environmental points that would affect the adequacy of the EIR. The primary purpose of active restoration is to restore native riparian plant communities to the project sites. Passive restoration of the sites would likely result in invasive and other nonnative vegetation establishment. See also Section 7.2.3, “Alternative 2–Passive Restoration,” in Chapter 7, “Alternatives,” in the Draft EIR.