

Friends of the Napa River

March 10, 2003

City of St. Helena
City Council Members
City Engineer Mr. Myke Praul,
1480 Main Street
St. Helena, CA 94574

Re: Comments on the St Helena Flood Protection Project, Draft Environmental Impact Report
January 2003

Dear City Council Members,
Dear Mr. Praul:

Friends of the Napa River are commencing the review of the Draft Environmental Impact Report (DEIR) for the "City of St. Helena Comprehensive Flood Protection Project." We appreciate the opportunity to provide you with our comments and concerns regarding the DEIR.

In addition to the comments in the attached letter, the attached 02/26/2003 Memorandum "Technical Review and Comments" by the well respected and well qualified consultant Phil Williams and Associates (PWA) is to be considered as part of our comments. Also, comments and memoranda that have been previously submitted (attached with our letter of February 11, 2003, to you) should be included in the public record for this project and in the Final EIR.

You will find substantial critique of the project and the "Enhanced Minimum Plan." This should not be seen as disrespect of the plight and aggravation of the citizens of this city who experience the hanging threat of flooding and subsequent devastation. We are very conscious, most notably, of the people living in the Vineyard Valley Mobile Home Park. Because of concern for these people, we do not believe that the residents of Vineyard Valley would be well served by a flood control project that may *not* provide protection from a 150- or 200-year flood event. PWA will detail the specific concerns with the hydrology and floodwater capacity and conveyance in the project reach.

We have concerns with the sufficiency of the DEIR. CEQA (California Environmental Quality Act) guidelines are very specific to ensure completeness of the documentation and require a reasonable range of alternatives. Identification of an environmentally superior alternative is required and must be substantiated within the DEIR. The method by which alternatives are selected or rejected must be comprehensive. Further, flood management projects funded by "Measure A" must adhere to the "Living River Principles." We have identified a series of questions that need answers to show consistency with these principles.

To summarize, we believe

- there are significant concerns to achieve the desired flood protection for the people in the flood plain
- geomorphic stability is questionable, most specifically at the Pope Street Bridge
- sediment deposition in the proposed terrace reaches may strand fish
- the project may require significant, costly long-term maintenance
- there are significant deficiencies in the DEIR. We believe that this substantially reduces the ability for the public to review, understand and comment on the project in an informed manner.

Our intent is to assist the City of St. Helena in the implementation of a consensus-based flood management strategy that comprehensively addresses the health of the river and the needs of the communities tied to it. It is our desire that the City adopt a flood management design that provides the maximum possible long-term protection to people and property from flood events and incorporates the Living River Principles. We believe that these goals are not only compatible, but also intertwined.

Due to the pressing need to protect people and property from potential flood damage, we suggest that the City consider a phased flood management plan. Such a plan could initially focus on the relocation of occupied structures at greatest risk, allowing time for the development of an effective flood management solution based on Living River principles.

In view of these comments, we suggest that the DEIR be withdrawn and that a new DEIR be prepared which fully remedies the deficiencies described above and in PWA's comments. We recommend involving the public more actively by creating a consensus based coalition process among stakeholders and resource agencies.

Sincerely,



Bernhard Krevet, President
Friends of the Napa River

CC: MIG, MBK, DFG, NMFS, NOAA, ACOE, PWA, Vineyard Valley, District 5 Supervisor

Attachments:

1. FONR DEIR Comments of 03/10/2003
2. PWA Memorandum of 02/26/2003
3. FONR to City Council cover letter of 01/27/03
4. PWA "Comments..." of 01/20/03
5. PWA "Comments..." of 11/29/02
6. PWA "Initial Thoughts" of 10/17/02