



PHILIP WILLIAMS & ASSOCIATES

CONSULTANTS IN HYDROLOGY

720 CALIFORNIA ST., 6TH FLOOR, SAN FRANCISCO, CA 94108

TEL 415.262.2300 FAX 415.262.2303

CEO@PWA-ITD.COM

MEMORANDUM

DATE: 11/29/02

TO: Chris Malan FONR

FROM: Phil Williams and Julie Haas

RE: **Comments on the St Helena Napa River Flood Control Plan**

As you requested, we are providing you with comments on the “Comprehensive Flood study for the City of St Helena” by CDM dated June 2002; and the “Geomorphic and Riparian Vegetation Assessment of the Proposed Napa River Flood Control Project” by Swanson Hydrology & Geomorphology dated October 31st 2002. We are sending you our comments now so that you may meet the December 2nd deadline set by the City.

We have organized our comments in four parts:

- First, a response to the questions you posed to us: “Is the proposed flood control plan developed in accordance with the ‘Living River Principles’”
- Second, our thoughts on how the Living River Principles can be applied by the City for developing a sustainable river management plan that balances human and ecologic uses of the river.
- Third, some suggestions that would help the City incorporate such a plan in its pending EIR process.
- Fourth, specific comments and questions on the two reports that we believe would need to be resolved before further development of the Plan.

Unfortunately because of limited time and resources our comments are focused on the major premises, assumptions and conclusions of these reports rather than constituting an exhaustive critique. Also you should note we have not had time to review the sections of the plan concerning Sulphur Creek and the proposed Adams Street Bridge, although we believe these may have impacts on the proposed plan. Nor have we been able to test the HECRAS model of the plan because unfortunately we only received input data for existing conditions.

Chris mal an

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We look forward to discussing these comments with the Technical Committee on December 3rd.