



February 19, 2019

Ms. Crystal Jacobson, Project Manager  
Placer County Community Development Resource Agency  
Environmental Coordination Services  
3091 County Center Drive  
Auburn, CA 95603

**Subject: Comments Draft Environmental Impact Report (EIR) for the Sunset Area Plan/ Placer Ranch Specific Plan Project**

Dear Ms. Jacobson:

Reclamation District No. 1000 (RD 1000; District) appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the proposed Sunset Area Plan/Placer Ranch Specific Plan Project (Project). As noted in the District's prior response to the Notice of Preparation (NOP) for this DEIR on February 27, 2018, RD 1000 is the entity responsible for the operation and maintenance of the levees and drainage system protecting the Natomas Basin in Sacramento and Sutter counties. Minimizing the impacts of flooding for human safety, health, and welfare is RD 1000's sole mission. As such, the District has been working closely with the Sacramento Area Flood Control Agency (SAFCA), State Central Valley Flood Protection Board and U.S. Army Corps of Engineers (USACE) on levee improvements to provide a minimum of 200-year flood protection to the system commensurate with the flood risk, as required by State Urban Level of Flood Protection standards. Along with the levee improvements, RD 1000 has been working with SAFCA, Sutter County and Reclamation District 1001 to address impacts of upstream development in the Natomas Cross Canal watershed, which consequently includes the proposed Project.

Due to the nature of the Project and RD 1000's mission to minimize impacts of flooding, the District requests the Final EIR specifically address the following comments:

DEIR Section 4.9 – Hydraulic Impact Analysis.

- The hydraulic impact analysis evaluates changes to peak stage for the 10 – 100 year flood events. The analysis does not include evaluation of the 200-year flood event, as required by the State's Urban Level of Flood Protection (ULOP), because as stated in the report, the watershed is less than 10 square miles and therefore statutorily exempt. The District

acknowledges that while it may be accurate to say the Project is exempt from ULOP, the document does not adequately address impacts to the downstream levee systems, which are subject to the ULOP. The District requests the hydraulic impact analysis be revised to include evaluation of impacts for the 200-year flood event.

- The evaluation of hydraulic impacts focuses solely on mitigating increases in peak flood stage. However, downstream interests are also concerned with changes in the duration of flooding and changes in velocity that have the potential to increase erosion. This is particularly true for downstream levee systems that have a short hydrograph. Extending the duration of high water on these levee systems may result in increased performance issues associated with seepage both through and under the levees. The District requests that future EIR's disclose the change in duration of flood events and determine whether that change adversely affects downstream levee systems. Mitigation measures could be considered that include alternatives such as groundwater recharge, metering the water more slowly out of the detention basin, or storage of the water for use.
- RD 1000 is concerned the potential impacts of increased storm water drainage flows into upstream tributaries for past projects; potential future projects; and specifically, for this Project, may increase flood risks downstream. Mitigating increased runoff is crucial in order to avoid downstream impacts to critical flood infrastructure. The detention/retention mitigation measures stated in the DEIR may not be considering all potential hydrologic impacts; specifically, increases to peak and base flows, the duration of runoff, duration of peak flows, and the subsequent increased periods of high velocities.
- Hydrographs for smaller systems tend to have shorter hydrographs. Past performance is based on this tendency and is considered in the design of downstream levee improvements. If detention is the alternative used to mitigate increases in peak flow, it can result in the adverse impact of extending the duration of the hydrograph. This has the potential to increase geotechnical problems, such as slope stability and under seepage, and can contribute to an increase of erosion potential, all of which would increase flood risk and create increased Operations and Maintenance (O&M) costs for downstream critical flood infrastructure. In addition, to peak flows and duration, upstream development typically results in higher base flows due to runoff from landscaping, wastewater treatment discharge, or other discharges associated with urbanization. Increasing base flows may also result in increased vegetation growth, erosion, and beaver activity; thus, causing an increase in downstream O&M costs.

Any of the impacts discussed in this letter could have detrimental downstream effects that not only could increase flood risk to public safety but could also result in increased O&M costs for RD 1000 that may be required in order to mitigate potential Project impacts. Flood risk may include erosion, increased vegetation, or potential impacts to channel maintenance or downstream flood infrastructure due to an increased duration of peak runoff and peak flows.

Therefore, RD 1000 believes additional hydraulic analysis is critical to deciding the Project poses no significant hydraulic impacts, as part of its Environmental Impact Report (EIR). This Project should also consider any planned future development within the area that may contribute to cumulative downstream effects on both stage and duration of peak flows. Until these impacts are considered, any EIR submitted without proper analysis would not be complete and could not be certified.

The District appreciates the opportunity to review and comment on the DEIR for the proposed Project. The District is prepared to work with the County and the Project applicant along with the District's flood control partners in the Natomas Cross Canal watershed. Should there be further questions or the need for additional clarification on the information provided, please contact me directly via email ([kking@rd1000.org](mailto:kking@rd1000.org)) or phone (916) 922-1449.

Sincerely,

**Reclamation District 1000**



Kevin L. King  
General Manager

Cc: *Delivered via electronic mail only*

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