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DEPARTMENT OF WATER RESOURCES
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October 6, 2025

Krystine Ball, Public Works Program Manager
One Main Street
Rio Vista, California 94571
kball@ci.rio-vista.ca.us

RE: Brann Ranch Master Planned Community Development Project Draft EIR SCH Number 2024060040

Dear Krystine Ball:

On behalf of the Department of Water Resources (DWR) the following comments are provided in response to the Notice of Availability of Draft Environmental Impact Report (EIR) for the Brann Ranch Master Planned Development Project (Project). DWR appreciates the opportunity to provide these comments.

Background

The Project is development of a master planned community on approximately 328-acres located in the City of Rio Vista (City). The Project includes the 321-acre property located at 7989 State Route (SR) 12 and approximately 7 acres of Caltrans right of way (ROW) for SR 12. The Project site is generally bounded by SR 12 on the south; McCormack Road on the north; Province Path, and Liberty Island Road on the east; and agricultural land to the west. The Project site is bisected by Canright Road.

The Project is located approximately two miles west and southwest of the proposed Little Egbert Multibenefit Project (LEMBP) which is located at the southern end of the Yolo Bypass immediately upstream of the City. The Little Egbert tract is protected on the north and east by a restricted-height levee that is designed to overtop at a 25-year or higher flood event within the lower Yolo Bypass/Cache Slough. The restricted-height levee has most recently breached in 1997 and 1986. A State Plan of Flood Control levee borders the tract on the west; farm berms and county levees are on the southwest portion of Little Egbert; and SR 84, and the Cache Slough “Real McCoy” Ferry landing are located at the southern end of the project area. LEMBP is planned to actively manage the land’s transition from agriculture to tidal wetlands, subtidal, and riparian habitat in a manner that maximizes flood benefits and climate resilience and enhances ecosystem processes and recreational opportunities. As part of the Final Feasibility Study for the LEMBP prepared by the Little Egbert Joint Powers Agency (LEJPA, 2023) (Attachment A) and continued project planning efforts, DWR has been evaluating the flood hydrology from the Yolo Bypass and inland hydrology of the Watson Hollow Slough watershed to analyze existing and potential hydrological impacts to the City.

The Notice of Preparation for the LEMBP, SCH# 2023060369, was released on June 13, 2023. On July 27, 2023, the City of Rio Vista’s Mayor Ronald Kott submitted a

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comment letter (Attachment B) outlining the City's concerns and noting that the City would be working collaboratively on the project with DWR. DWR provides the following comments on this Project and looks forward to our continued collaboration.

Comments

Section 3.10 Hydrology and Water Quality

The Project's "Summary of Stormwater Quality and Peak Flow Control Infrastructure Modeling" report, Appendix G of the DEIR, does not provide the information needed to support the less than significant impact conclusions for hydrology. To adequately support the hydrological impact conclusions, for the following areas, please provide the model extent and flow inputs along with either a more detailed analysis to support the existing modeling conclusions or re-run the model and provide an analysis which supports the less than significant conclusion for hydrology.

1. To conclude that flood impacts are less than significant, the post-project hydrologic modeling needs to demonstrate there is adequate capacity in Watson Hollow Slough to convey the additional stormwater from the Project. The Project's modeling report in Appendix G notes that Watson Hollow Slough at Airport Road is the furthest downstream point of compliance used to evaluate peak flow rates. However, under existing conditions, water levels in Watson Hollow Slough can be influenced by flood events in the Yolo Bypass, which at a 25-year or higher flood event can overtop the restricted-height levee along the Little Egbert tract, backing up into Watson Hollow Slough beyond the Airport Road Bridge.

Please clarify if Yolo Bypass flows were included in the hydrologic modeling of the 100-year event to account for the overtopping of the restricted-height levee and subsequent additional flows in Watson Hollow Slough. If this was not included, please re-run the model. DWR recommends using the Sacramento River hydrology from the Central Valley Hydrology Study (CVHS), as was used for the analysis in the LEMBP Final Feasibility Study Appendix A Exhibit A "Flood Hydrology and Hydraulics Feasibility Analysis Technical Memorandum" (MBK, 2023), which is attached. Another approach to conduct this modeling could be to perform a hydraulic analysis using the most recent Central Valley Floodplain Evaluation Delineation (CVFED) HEC-RAS model.

2. The invert elevation of the bio-retention outfalls to Watson Hollow Slough are at elevation 15 feet. To prevent overtopping of these features, the design elevation should consider the water surface elevation in Watson Hollow Slough during a 100-year flood event in the Yolo Bypass when the Little Egbert tract restricted-height levee would be overtopped and breached.

Chapter 4. Cumulative Impacts

3. The proposed Little Egbert Multibenefit Project, which is located approximately 2

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miles west of the proposed Brann Ranch development needs to be included in the cumulative impact analysis. As stated in Section 4.2.1 Geographic Scope of the DEIR, the geographic area that could be affected by the Project includes areas that encompass the Little Egbert Multibenefit Project area, i.e. “Solano County” and “Eastern Solano County”. Additionally, the Little Egbert Multibenefit Project is located within the Watson Hollow Slough watershed, as is the City’s Project. As the City is aware, the NOP for LEMBP was released on June 13, 2023, and provides the information for LEMBP to be included in the Chapter 4 Cumulative Impacts analysis. Please note that the revised cumulative hydrology analysis for a future condition with the Little Egbert Multibenefit Project in place, the restricted-height levee would be breached, allowing flood waters at below a 25-year event to enter the tract.

4. Climate Change

The Final EIR needs to evaluate the Project’s potential impacts to climate change, specifically, the potential hydrology impacts. The Project impact analysis could be based on the Project’s effect on California’s efforts to meet the State’s long-term climate goals or Rio Vista’s 2045 General Plan Updates’ climate change goals and policies, such as those outlined under the "Safety Element" (p. 9-24):

> “Goal SE-3: To increase the resilience of the community to climate change. Policy SE-3: Ensure City infrastructure in 100-year, 200-year, and 500-year floodplains conform to existing 100-year and 200-year floodplain elevation standards and can adapt to increased flooding."

Once a standard is selected, the evaluation would be based on the Project’s effect on meeting the goals in that standard. When the project can demonstrate that it is consistent with meeting those goals, it can be found to have a less-than-significant impact on climate change under CEQA.

The Department appreciates the opportunity to review and provide comments. If you have any questions, please feel free to contact me. We look forward to working with you.

Nancy E Finch

Nancy Finch

Attachment A: Little Eggbert Multi-Benefit Feasibility Study (appendices not included but can be found here LITTLE EGBERT JOINT POWERS AGENCY, CA and pdf version will be sent upon request)

Attachment B: Comment letter from Rio Vista’s Mayor Ronald Kott