

Please Insist on a Better USACE Proposal for American River 3B Project (Form Letter 1)

Dear Jane Dolan and Chris Lief:

I am writing to ask that you and Sacramento County officials persuade the US Army Corp of Engineers to perform a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

1 The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”. I strongly question whether this work is necessary along this section of the American River.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

2 This new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I object to the extreme destruction of trees (including potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used (such as in-place use of stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

3 This and ALL future erosion control projects must be required to have a more targeted analysis and approach. As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

4 Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and it would destroy a vital stretch of the Parkway. I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

URGENT! I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF). Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".

In addition, I request that USACE hold an in-person public meeting on this significant proposed project.

Thank you.

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR):

1 My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

The American River Parkway and its woods and wildlife are extremely valuable to me.

[YOU CAN CUSTOMIZE HERE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY AND THE WILD AND SCENIC AMERICAN RIVER].

2 I do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, I do not see adequate justification for the claim that these highly destructive actions are “necessary” for (or would even actually improve) flood safety along this section of the American River.

I am writing to insist that the US Army Corp of Engineers perform a more appropriate environmental analysis of the significant impacts of the proposed project and its subcomponents, and not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4 is presented.

3 I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations at a much more fine-grained scale than simply the overall project.

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Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternative methods for a much more surgical, fine-grained approach are not presented. Such alternative methods would result in far less environmental damage.

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The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE there was no prior revetment – introduces a compounding set of significant adverse impacts, including the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, adding damage to roads and levees, putting equipment staging areas in parks and beside elementary schools, an increased need for mitigation, and the unaccounted for loss of additional trees due to “access ramps” that are known to be needed but have not been shown in the draft SEIS/SEIR, making it impossible for the public to know the full loss of trees or the exact trees that would be saved vs. lost. This is unacceptable. A full range of other design choices have not been meaningfully presented that could have very different and less significant impacts.

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Further, the use of jagged quarry rock from unspecified source(s) has not been adequately evaluated for the possibility of asbestos-containing composition, such as the serpentine rock common in the surrounding foothills. Installation of hundreds of truckloads per day of such rocks and the

associated dust within a quarter mile of a school has not been addressed in the SEIS/SEIR.

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Air quality impacts are not adequately addressed. The toxic air pollution impacts of diesel trucks used and staged near O.W. Erlewine Elementary School has not been adequately addressed. For California/CEQA, diesel exhaust particulate matter (Diesel PM) is an identified carcinogen, with a cancer potency value from the state Office of Environmental Health Hazard Assessment (OEHHA). In the age group 2 to 16 years old, children are three times more sensitive to a carcinogen like Diesel exhaust than adults. (Between third trimester and 2 years old, they are 10 times more sensitive). The proposed project is large with 100 daily truck trips at each restoration site with staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under the California Air Resources Board (CARB) Truck and Bus Regulation, so the mitigation is not adding anything beyond existing law. The mitigation measures need to require these trucks to be much cleaner, and less carcinogenic for the local population, and especially children. Trucks should be 2014 or newer or, better yet, electric. Under CEQA, where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (California Public Resources Code § 21081; 14 CCR § 15126.2(b)).

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Further, although construction of the Project would occur over two years, each site may have over 100 daily truck trips at each location that would travel through residential communities. The

SEIS/SEIR claims “less than significant” impacts of air pollutant on sensitive receptors. However, OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHA, p.8-18). As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. This way, the lead agency can provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact. This has not been provided.

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side alone of the American River Parkway for “potential bank erosion” protection. The USACE claim that this protection is necessary is based on minimal, overgeneralized, and often highly subjective and/or out-of-date information and modeling, and very little empirical data. Subjective expert opinions were used, and were often inconsistent among different sources, and some may have been based on pre-slurry wall levee conditions. I do not see adequate support for the USACE claim that this extension and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence justifying the significant impacts. While seepage is mentioned for other reaches, it is valuable to keep in mind that for Contract 3B, the data presented show no seepage risk for this zone (neither for through-seepage or under-seepage, especially after the 60 feet

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deep or more slurry cutoff walls were added to the levees years ago); and there is inadequate evidence for any urgent erosion issues. The USACE erosion analysis overgeneralizes the need based on limited data, and fails to account for the erosion-resistant Fair Oaks formation. The modeling of velocities at the levee during peak water flows used out-of-date models that likely did not adequately account for the protective effect of trees in slowing the flow velocities at the edges, which protects the levees. Advanced modern modeling recently conducted on other segments of the lower American River demonstrates the protective effect of trees when included in the models. I strongly question whether this Project is necessary along this section of the American River. This calls into question whether the environmental impacts can be deemed "significant unavoidable" when the need for the work has not been demonstrated by either appropriate modeling or empirical data.

10

Further, I believe the USACE approach to destroy miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and then to leave behind denuded, bare dirt banks and "planting benches", for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings -- could actually make us more vulnerable, not less. The proposed approach is just as likely to put us at risk in high water flows as no work at all. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. (We understand a recent revetment area under a prior contract

suffered damage during the far-from-peak-design flows during the 2023 storms).

11 Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, that the on-site “planting benches” may be lost as well, exposing riprap and/or leaving the banks bare of vegetation and vulnerable to erosion. Yet there has been no follow-through on prior and current requests for a commitment regarding repair and replanting in such events.

12 I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River (designated for its outstandingly remarkable values, ORVs, for recreation and fish), and which would extend into a “Protected Area” of the American River Parkway Plan, so designated due to its sensitive and mature riparian habitat, vital for human recreational use, aesthetic and visual character, and for sustaining the Parkway’s wildlife. A “surgical approach”, not miles of bulldozing, is the only acceptable option, and only where data justify the need.

13 I object to the irreplaceable loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, dog walking, fishing, picnics, kayak and canoe access, paddle board access, bird and wildlife viewing, photography, solitude, a respite for mental health, and many other uses) for miles along the river’s edge. Riprap will make river access dangerous along long stretches of the river, and make recreation difficult, if not impossible, for miles. The SEIS/SEIR fails to recognize, let alone

mitigate for, the impacts to most recreational features except the bike trail. In particular, the environmental impact analysis has not adequately addressed the loss of dozens of unofficial, but much loved small beaches, riverside access trails, and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in an urban area (otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more) highly valued by recreational Parkway users. This is inconsistent with the provisions of the secretarial designation of the Lower American River under the Wild and Scenic Rivers Act (Federal Register, Vol. 46, No. 15, January 23, 1981). In classifying the Lower American River as "an outstandingly remarkable recreation waterway," the Heritage Conservation Service noted that "the American River Parkway is one of the most unique stretches of public parkland in the country because of the close proximity of its natural and recreational features to the urban environment of Sacramento and adjoining communities." Among the values noted was "lush riparian growth that includes walnut, oak, cottonwood and sycamore trees." Part of what makes this "riparian hardwood strip" so valuable for recreation is that "the riparian vegetation is carefully protected". The US Interior Department and the Heritage Conservation and Recreation Service noted that the protections for values such as "scenic, water quality, free-flowing condition and natural character, geologic, historic, fish and wildlife," all "link to create an aesthetic environment intrinsic to the overall recreational value of designated rivers." Thus, any long-term impacts to the mature riparian forests of the Lower American River would directly affect the INTRINSIC conditions

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which make the Lower American River a State and Federal Wild and Scenic River. In the 2016 GRR comment responses, the Corps said they would minimize impacts to vegetation, but stretches near River Park were basically clearcut. Will the Contract 3B area be clearcut too?

I believe that Sacramento Regional Parks and the National Park Service need to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

16

I object to the extreme destruction of over 500 trees in Contract 3B—south alone, including potentially heritage oaks over 200 or 300 years old -- older than California and some older than our nation -- which studies suggest will never again reestablish that longevity over the jagged, quarry riprap installed with a cover of a few feet of lifeless soil.

The cumulative effects with this new project, Contract 3B, would bring the total length of American River banks damaged by USACE erosion control projects to almost 11 miles of the Parkway, including some of the most wilderness-quality miles of the lower American River.

17

The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations.

This environmental justice (EJ) impact has not been adequately addressed in the environmental analysis.

18

The permanent impacts to recreation, vegetation, wildlife, shaded fish habitat, aesthetics and vistas are not “less than significant” nor are they “mitigated to less than significant”. When there are “significant unavoidable” impacts, CEQA requires that all feasible measures be used to reduce the impacts. The draft SEIS/SEIR does not meet that requirement.

If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used, including the use of smaller equipment, and nature-based solutions (such as in-place use of existing stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service, that retain and integrate the existing trees and vegetation). These alternative methods were not adequately evaluated.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

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The US Army Corp of Engineers needs to reevaluate the design choices that result in what are deemed “significant unavoidable” environmental impacts, and develop more surgical, fine-grained alternative methods for project subcomponents; then conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; and then proceed if and only if justifiable need is found. In particular, the project should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control

Projects 3B and 4 is presented. In addition, all heritage oaks must be retained and protected.

The American River Parkway is often called the “Crown Jewel of Sacramento”. In 2012 it was designated a “Regional Treasure”. The Contract 3B actions move into a zone designated a “Protected Area” under the American River Parkway Plan. The proposed actions under USACE Contract 3B affect this protected and irreplaceable regional treasure for generations to come, and should reflect the far greater care that this treasure deserves.

Thank you.

[NAME]

AR Parkway Form Letter 2 (Form Letter 4)

Subject: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Dear US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR) Comment Recipients:

- 1 My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is extremely valuable to me.

[YOU CAN CUSTOMIZE WITH YOUR PERSONAL CONNECTION WITH THE PARKWAY. THE WILD AND SCENIC RIVER DESIGNATION WAS BASED ON “RECREATION” AND “FISH”, BUT THE DEFINITION OF “RECREATION” IS BROAD ENOUGH TO INCLUDE INTRINSIC VALUES THAT INCLUDE A PERSON’S ENJOYMENT AND VALUE OF NATURE AND WILDLIFE AND WOODS IN ALL FORMS.]
- 2 I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.
- 3 Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented.
- 4 My specific concerns and comments include the following: **[YOU CAN ENTER YOUR OWN LIST OF CONCERNS, OR YOU CAN COPY AND PASTE FROM OUR LIST OF KEY CONCERNS FROM OUR TEAM OF REVIEWERS]**

[THEN YOU CAN END WITH YOUR OWN CLOSING REQUESTS, OR COPY AND PASTE FROM OUR LIST OF SUGGESTED REQUESTS FROM OUR TEAM OF REVIEWERS]
- 5 The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

The American River Parkway is often called the “Crown Jewel of Sacramento”. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

[YOUR NAME AND INFO]

Form Letter 5 (AR Parkway Form Letter 3)

Subject: Please Help Ensure a Better USACE Proposal for American River 3B Project

To: Jonah.Knapp@CVFlood.ca.gov

Cc: Chris.Lief@CVFlood.ca.gov

Bcc: AmRivTrees@gmail.com

Dear President Dolan and Members of the Board and Staff:

1

I appreciate you dedicating your time and expertise to serve on the Board and listening to members of the public who are concerned about the US Army Corps of Engineers (USACE) proposed Contracts 3B and 4 for “bank erosion protection” on the lower American River east of Howe Ave.

I am writing to ask that you and the Board work with the US Army Corp of Engineers to revise the proposal and not proceed with those components until there is a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.

2

And, I respectfully request that your Board:

Hold a workshop specifically addressing this proposal and public hearing on the proposal prior to the close of the comment period and prior to a vote on the project;

Work with USACE to extend the public comment period to ensure the above occur;
Work with other agencies to address the many unanswered questions and concerns that have been expressed by so many members of the public at the USACE virtual public meetings, in comment letters, and at other public forums. Professionals and specialists with detailed information and qusaestions concerning the proposed removal of nearly all trees and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses. The US Army Corps of Engineers presented at your February 9, 2024 Workshop their goal to “Communicate, communicate and communicate as soon as possible”. It is necessary this goal be accomplished now.

Now that the Agenda for your next meeting on February 23, 2024 has been posted and does not have this project listed, the extension of the public comment period is crucial to helping the public gain further understanding and support USACE in their above stated goal to communicate.

3

As you are aware, the US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway (south bank alone) for “bank erosion protection”. The USACE claim that this protection is “needed” is based on minimal, overgeneralized “data”, and does not use advanced modern modeling to account for the protective effects of trees. I strongly question whether this work is necessary along this section of the American River. The plans shown on the USACE website and presentations lack sufficient data and details for such a major construction project, and documents are not clear regarding what and where data were collected to warrant such extreme measures. And while we appreciate the extension to February 23, over 1,000 pages were provided just before the holidays in December for public review and comment, and there is still not enough time to answer all the questions posed, especially considering the fact that many aspects of the proposal do not seem to follow guidelines within the American River Parkway Plan and the Wild and Scenic Rivers Act.

4

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as likely to put us at risk in high water flows as no work at all. I strongly oppose the “brute force” bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows.

5

The new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I oppose the extreme destruction of trees (including some potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion “spot fixes” are needed at some locations, then less destructive alternative methods should be used (such as in-place use of existing trees and other stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

This and ALL future erosion control projects must be required to have a more targeted analysis and approach.

6

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to county, state, and federal officials when the Army Corps is involved. I do not support the USACE claim that this extension and the methods planned are “needed” for flood safety in this zone; and instead it would destroy a vital stretch of the Parkway.

I urge you to stand up for this special stretch of the American River Parkway, and to urge Sacramento Regional Parks to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

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Please schedule an onsite public meeting with the professionals of the responsible agencies presenting data and fostering a collaborative environment to address these important issues. The O.W. Erlewine Elementary School has been suggested as a meeting location that has been used in the past and is also one of the proposed staging areas for heavy equipment in the latest proposal, and a short walk from pristine areas endangered by the proposed project. Supervisor Rich Desmond has promised to assist in the organizing of public meetings to discuss this major impact to our region and our lives.

As you know, the American River is often called the “Crown Jewel of Sacramento”. Sacramento’s “jewel” deserves the utmost care now and for future generations!

Thank you.

List of Key Concerns

1. Limited Evidence for Unnecessary Removal of Trees and Vegetation:

- Trees are not a significant risk to levee stability. In fact, trees and vegetation provide self-renewing natural armoring of the banks that would be eliminated. Removing trees may make us less safe.
- Historically, levee failures were more associated with areas where riparian forests had been thinned or clear-cut.
- Inadequate environmental analysis of the removal of 200+ years old heritage oaks would constitute an “unmitigable” impact on the visual and aesthetic resources of the Parkway
- Destruction of vegetation worsens the heat island effect.
- “Access ramps” will destroy additional trees but were not accounted for in the draft SEIS/SEIR.

2. Rip Rapped streambanks present significant negative consequences:

- Shorelines composed of large, angular rock make access by people for swimming, fishing, birdwatching, watercraft deployment, and other uses dangerous at worst and highly unpleasant at best.
- The river’s Wild and Scenic designation is compromised by a rigid, artificial shoreline. Riprapped shorelines are ugly and detract from the natural feel of the Lower American River that makes it such a special place and refuge in our city and area.
- Riprap hinders natural riverbank vegetation growth, and stifles tree growth. Heritage trees would be forever lost.
- The planting benches being proposed on top of the launchable rock toes and trenches will likely collapse (“launch”) when the launchable rock toes and trenches eventually launch. No provisions or commitments have been made to replace lost planting benches.

3. Erosion is minimal in USACE’s Contract 3B:

- Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.
- Modern, advanced modeling for peak 160,000 cubic feet per second flow predicts that water velocities are low at the levees. The older models used did not account for the protective effect of trees slowing the velocities at the edges.
- The improvements to weirs and bypasses, and the new spillway at Folsom dam and new operating protocols allow for better managing of flows, including earlier release of water when storms are forecast.

4. Impact on Wildlife and Critical Habitats:

- The biodiversity of this ecosystem is complex and interconnected and is heavily used by wildlife
- Clear-cutting and rip rapped streambanks pose a threat to critical habitats for various fish species, including Chinook Salmon, Central Valley Steelhead, and North American Green Sturgeon.
- Clear-cutting disrupts the nesting, mating, and feeding habits of local and migratory bird populations.
- Large, mature trees provide essential nest cavities that would be lost.
- The substantial loss of shade from the mature canopies along the river’s edge may lower the survival rate of various species of salmonids.
- The petition for listing the western pond turtle imposes additional requirements on the environmental analysis and mitigation.
- High levels of noise and vibrations will disturb natural animal behaviors such as nesting, spawning and feeding activities

5. Recreational Access:

- This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths in the forest and beaches along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Why should we think that the Corps will do anything different than at River Park, where all of these features such as mature trees, beaches, footpaths, etc., appear to have been destroyed? Sac State is used as a restoration example, but we know of no beaches, footpaths, fishing access points there, either. Why should we trust that 3B will be different when even the SEIS/SEIR does not address these issues?
- Installation of miles of angular rock (riprap) will make river access dangerous along large stretches of river, and will greatly impede swimming, fishing, and deployment of watercraft such as kayaks. This will be a permanent and significant loss of irreplaceable recreational amenities to the community that is not accounted for in the SEIS/SEIR, despite promises by the Corps in 2016 to address these significant issues.
- The permanent loss of mature trees, beaches, river access points, footpaths, and other recreational amenities is not “less than significant” as stated in the SEIS/SEIR. The Corps needs to document these losses and redo the SEIS/SEIR to account for them, including proposals to modify the project where possible to minimize losses.
- The public has a right to know how specific recreational amenities will be affected by this project. The level of detail in the SEIS/SEIR makes it impossible for the public to see what will be done, and all we can assume is everything in 3B upstream of Watt Avenue on the south side will be ripped out like at River Park. The public has a right to know the details at this stage of review and should not be required to “trust” the Corps. We want the Corps to document and justify specifically which of our trails, trees, beaches, fishing access, and riparian forest must be destroyed to keep us safe from floods, and how much of that destruction will be replaced, versus what will be lost permanently given current design.
- What mitigation for lost beaches, trails, forests, etc. will there be? The SEIS/SEIR does not discuss the loss of these features, so it also inappropriately fails to discuss mitigation for permanent impacts to features that the Corps cannot replace onsite. If beaches or trails are lost forever onsite, will other beaches or trails be installed?

6. Mental Health and Vegetation

- Trees contribute to the creation of green spaces, which have been associated with improved mental health. The presence of greenery has been linked to reduced stress levels, enhanced mood, and increased feelings of well-being. The removal of trees can lead to a loss of these beneficial green environments.
- Research has shown that “green exercise” may confer mental health benefits in addition to improving physical health.
- Natural park settings decrease anger, anxiety, and depression; and increase restoration and tranquility.
- The U.S. Department of Health and Human Services states that the lack of green space is one of the most important causes of childhood obesity, and the need for green places to protect children's health is becoming more recognized and apparent.
- Trees play a role in filtering air pollutants and absorbing noise. Their removal can contribute to increased levels of air pollution and noise, both of which have been associated with negative effects on mental health. Poor air quality and excessive noise can contribute to stress, anxiety, and other mental health issues.
- Trees often serve as gathering places and contribute to the sense of community. The removal of trees can alter the social dynamics of an area, potentially reducing opportunities for social

interaction and community engagement. Social connections are important for mental health, and changes in community dynamics can have psychological implications.

7. Cultural Restoration and Inclusion:

- Culturally significant plant species must be included in restoration and mitigation efforts, allowing for tribal ceremonies.

8. Air Quality:

- For California/CEQA, diesel exhaust particulate matter (Diesel PM) is a carcinogen, with a cancer potency value from the Office of Environmental Health Hazard Assessment (OEHHHA), and OEHHHA reports that between the ages of 2 to 16 years old, children are three times more sensitive to a carcinogen than adults. (Between third trimester and 2 years old, they are 10 times more sensitive).
- The project is large, with over 100 daily truck trips at each site and staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under CARB's Truck and Bus Regulation. The USACE mitigation measures should require much cleaner trucks -- 2014 or newer or, better yet, electrics.
- Even where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)).
- Although construction of the Project would occur over two years, each site would have over 100 daily truck trips at each location that travel through residential communities. USACE claims less than significant impacts of air pollution on sensitive receptors. However, the OEHHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months (OEHHHA, page 8-18). USACE should have prepared a construction health risk assessment (HRA), to provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact.
- Using quarry rocks from unspecified quarry sources has not been adequately addressed for concerns that the rocks may contain asbestos content (given the prevalence of serpentine rocks in surrounding foothill sources). Dust from hauling and dumping asbestos-containing rocks within a quarter mile of a school requires further environmental impact analysis.

9. Environmental Justice (EJ):

- The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This environmental justice issue has not been adequately addressed in the environmental analysis.