
From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:41 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Trees

-----Original Message-----

From: Joan Toomire <j2mire@gmail.com>
Sent: Friday, February 23, 2024 8:23 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Trees

1 | Totally shameful to cut down over 500 trees for “erosion control”. In 10 years you’ll be screaming for money to plant trees.

STOP IT! Leave the trees

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:40 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Opposition to Flood Protection Plan

From: Linette Mansberger <lmcopperhead@gmail.com>
Sent: Friday, February 23, 2024 8:12 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Opposition to Flood Protection Plan

Hello!

I live in Pennsylvania, but I have visited the American River Parkway numerous times and have enjoyed my time there among the trees and the wildlife that abound there.

1 | I am strongly opposed to your proposed project that will destroy valuable riparian ecosystem in the American River Parkway.

Thank you for listening!
Linette Mansberger

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:39 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Cindyelliott <ewbug@sbcglobal.net>
Sent: Friday, February 23, 2024 7:51 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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 and Sacramento.

A It is literally in my backyard and is the main reason I moved to and live here. I walk and visit this area almost daily. I would be devastated if this was unethically ripped out and destroyed.
THERE IS A BETTER WAY!!!

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Cindy Elliott

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:37 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway

-----Original Message-----

From: Trysh <mymudra@gmail.com>
Sent: Friday, February 23, 2024 7:44 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway

1 | Please leave the trees!!!

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:20 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Project, whatever your designation for East of Watt Av.

From: Randy Fisher <rndyfshr@gmail.com>
Sent: Friday, February 23, 2024 7:30 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: richdesmond@saccounty.gov
Subject: [Non-DoD Source] American River Project, whatever your designation for East of Watt Av.

1 Thank goodness I finally found some volunteers who could provide some information on the American River project - whatever you call it for the project East of Watt Av. Searching Army Corps websites for hours I've found nothing about this area. There is some shallow descriptions of already completed sections near Howe Av. and 2-hour deeply technical videos covering the entire area. What the hell? Is the Army Corps trying to sneak this by because it's such a huge governmental funding commitment?

2 I find no effort to explain to residents what the need is? Yes there were floods in 1950 before the levees, etc etc. That's not explanation for THIS project. First of all, I find no mention of the huge fairly recent project inserting the "slurry walls" - is that what it was called? Because I understand the purpose of that project, but I can't find any mention of it or why now it is decided it was not adequate. Was the current plan already part of that project and we're just discovering it?

I've been involved with Community Engagement for the arts for decades. The #1 thing understood since the 1980s is that, to persuade, you have to speak the language of those you are talking to. Otherwise, you're doing more harm than good in gaining any interest in your work because you're building more resistance to your

purposes.

3

So far, every time I try to gain information about this project, I just get more pissed off and ready to block your work in any way possible. You've got full resistance getting ready for you unless you actually care to explain to us that this project does something for us and not just yourselves in your insular world that clearly cares only about persuading politicians and self-perpetuating funding.

Randy Fisher

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:19 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: PAUL LUKKARILA <pqlmkl@prodigy.net>
Sent: Friday, February 23, 2024 6:47 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; RichDesmond@saccounty.gov; PatHume@saccounty.gov
Subject: [Non-DoD Source] 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):

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

1 The American River Parkway and its woods and wildlife are extremely valuable to me and my family, neighbors, and friends.

As a citizen that lives right near the American River and has had the luxury of using and maintaining its unbelievable riverbed greenery that for decades has provided a different escape to a world of nature. Its pockets of cool temperatures provided by a mature canopy was/is a godsend from the urban pavement/ commercial and residential neighborhoods that built and “chose” to live as near as the government elect allowed/allows. I have seen what they have done so far and it is devastating to us, to the large tree canopy that kept the shore line water cool, fish, wildlife, frogs and occasional homeless.

Now we are being “directed” to take its centuries provided beauty and “armor” multiple section that are below a multiple of dams to protect levees that give us what level of safety? We hear broad

2 statements but not even for what, where and who is really benefiting from the modeling to minimize a "risk" analysis? A good risk statement would be giving us "event", the "consequence" and what this project would be doing? What are the triggers? A 50, 100, 200 year event? ...More paving and channeling of upstream projects?. Are we going to be regretting all the "straightening, erosion protection" to be another LA River channelization- just not paved?

What happened to the context sensitive solution? Can the community that is affected have any say/vote or does that have to be through the chain of command? We are talking the last remnants of a thousand year complex ecosystem to be "destroyed" for what? Where is the evidence? Are we going to be taken off the most vulnerable flood prone city in the nation? I would contend for the analysis that of the chain of events that breaks the existing strengthen levees, for what we will loose to the eventual trapezoidal channel of the Army Cores making isn't worth it. Let the public affected by these options vote or so we have to for our leaders that make this decision? ...I mean wow...we, my kids, my kids will never know and the flood risk will be just a little bit better? ...How do we make up for the loss of such a lung breathing canopy with the barren moonscape that the first few projects have provided? Unsightly, dangerous, and just a flat out loss of a cultural/living/wondrous open space for an unnamed erosion "bogeyman". Who is the real, final decision maker- I would say follow the money and if we had a choice, I would say start buying and expanding the flood plain, create more open space for the river, leave it a little more wild. Also, what is the maintenance to be in the future? ..Any unplanted tree over 3" in diameter be removed? ...Always a moonscape?

4 I do not support the methods being proposed to address streambank erosion without further analysis and better explanation as to "why", "who", "where" will be affected. What are the real benefits and losses/.

5 I totally disagree with the current environmental analysis characterizations and mitigations. I do not believe they have addressed all feasible/alternatives and again...to what quantitative "risk" are we achieving being good stewards of tax dollars.

Furthermore, where has these kind of projects been successful? I think history has shown that we have had two big events in the last three decades and two of those were without the levy "strengthening" and they held. If a levy does break, it was more attributed to the dams inability to control flow and in that case, no levy improvements would or will help.

I hope you will further explain and educate the public on the why, benefits and hopefully less destructive work on a place where we will have to live with your results. This American River is the jewel and your messing with it...let us who live here understand the risk in better detail and let us vote on what that mitigate and acceptance be.

Thank you..

Paul Lukkarila

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:18 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Please reconsider bank erosion project

-----Original Message-----

From: Shannon <snowstem@hotmail.com>
Sent: Friday, February 23, 2024 6:45 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Please reconsider bank erosion project

1 I am saddened and disgusted to hear that the bank erosion work on American River is planned to continue upstream between Watt and Estates!!! This is sacred wild land, home to many animals, beautiful trees, and incredible dirt paths that so many of us delight in walking/running/exploring. I meditate on these shores, dip in the river, watch deer graze, bird watch. Please I beg you, do not proceed with this section of erosion work. The tree roots themselves are the best erosion prevention!! When will man stop destroying nature??? Man cannot survive without the trees. Please don't destroy this slice of wilderness and displace thousands of animals (snakes, birds, deer, coyotes, and all the little guys, etc.)

2 Please don't proceed for a minor threat of levee seepage. Please, this will devastate all those humans who bought property near the river to enjoy the wild and scenic parkway!!! Not to mention decrease home prices. We all have assumed risk of flood when purchasing.

Sincerely

Shannon Wilson
Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Urgent Call to Action: Preservation of the Lower American River and Concerns Regarding ARCF SEIS/SEIR – December 2023

-----Original Message-----

From: John Lee <attica98@gmail.com>
Sent: Friday, February 23, 2024 6:59 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; richdesmond@saccounty.gov
Subject: [Non-DoD Source] Urgent Call to Action: Preservation of the Lower American River and Concerns Regarding ARCF SEIS/SEIR – December 2023

Subject: Urgent Call to Action: Preservation of the Lower American River and Concerns Regarding ARCF SEIS/SEIR – December 2023

Dear Supervisor Desmond, US Army Corps of Engineers (USACE), and Department of Water Resources (DWR) Comment Recipients,

I am compelled to address a critical issue that stands to profoundly impact the Lower American River, a cornerstone of our community's natural heritage. This letter serves as both an open plea for public awareness and a formal commentary on the American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) for December 2023.

A

The Lower American River, known for its pristine landscapes and diverse ecosystems, is currently under threat from proposed bank erosion projects that could see over 500 trees demolished. This initiative, ostensibly aimed at erosion control, appears to be influenced by financial incentives for condominium development upstream, posing a significant risk to the river's ecological integrity.

My connection to the river is not merely recreational but deeply personal, as it is for many in our community. The parkway's intrinsic value, encompassing nature, wildlife, and the serenity of the woods, cannot be overstated. The proposed clearcutting and subsequent bare-banking over two construction years, followed by inadequate replanting efforts, could irreversibly damage this ecosystem.

The draft SEIS/SEIR's environmental analysis, in my view, fails to adequately address the significant impacts of the proposed projects, particularly Contracts 3B, and 4A and 4B. The document does not provide sufficient mitigation

strategies to reduce these impacts to an insignificant level nor does it explore all feasible alternatives to the "unavoidable" impacts proposed.

Under the California Environmental Quality Act (CEQA), it is mandated that all feasible mitigation measures be incorporated, even when impacts are deemed "significant and unavoidable." Unfortunately, the draft SEIS/SEIR falls short of this requirement, lacking a comprehensive analysis of less destructive, more targeted alternatives that could preserve the parkway's ecological and aesthetic values.

I urge the USACE and involved stakeholders to reconsider the proposed approach to erosion control along the Lower American River. It is imperative that a more detailed environmental analysis be conducted, focusing on less invasive methods that respect the delicate balance of our cherished "Crown Jewel of Sacramento."

The decisions made today will echo through generations, shaping the legacy we leave for those who follow. Let us choose a path that honors the natural beauty and ecological significance of the Lower American River, ensuring its preservation for years to come.

Thank you for your attention to this urgent matter. I stand ready to engage in further discussions to find a sustainable solution that safeguards our community's natural treasure.

Sincerely,

John Lee

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:16 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: brian agnell <daredevilcourier@yahoo.com>
Sent: Friday, February 23, 2024 5:41 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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].

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.

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.

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.

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.

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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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).

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.

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.

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 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.

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.

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.

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. 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.

Brian Agnell
Owner
Bizfox
Apostille & Notary
Daredevil Courier

biz-fox.com
bizfox@yahoo.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:16 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: brian agnell <daredevilcourier@yahoo.com>
Sent: Friday, February 23, 2024 5:41 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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].

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.

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.

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.

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.

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.

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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Thank you.

Brian Agnell
Owner
Bizfox
Apostille & Notary
Daredevil Courier

biz-fox.com
bizfox@yahoo.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: pscorcoran827@gmail.com <pscorcoran827@gmail.com>
Sent: Friday, February 23, 2024 12:33 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

I have lived in the Sacramento area for 60 years. I grew up in the River Park and College Greens neighborhoods. Growing up I frequented the American River in the area of Howe Avenue and Watt Avenue. I have spent many hours walking and running the trails, wildlife viewing, bicycling the bike trail, fishing, swimming and rafting.

A As a young adult I worked as a Park Ranger Assistant with the Sacramento County Department of Parks and Recreation. I have a Bachelor of Science degree in Recreation Administration from CSUS. I understand and value the importance of having appropriate natural spaces within urban settings for the benefit of society.

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.

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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 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.

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).

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.

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. 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 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.

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.

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.

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. 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.

Patrick Corcoran

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:14 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Lori Ward <fosllori64@gmail.com>
Sent: Friday, February 23, 2024 12:06 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] 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):

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.

A As co-founder of Friends of Sutter's Landing Park, a 25-year resident of midtown Sacramento, lifelong nature lover, and a longtime advocate for the environment and protecting our natural spaces, I see the value in a rich connected stretch of riparian forest along the American River, and, specifically, the Lower American River. Riparian forest connectivity is key for wildlife, helping to address climate change, and the health of the river and all who depend upon its waters. What the US Army Corp of Engineers is doing is destructive and extremely shortsighted. We need MORE trees/habitat, not less. Vegetation is a natural erosion control. I feel the US Army Corp of Engineers is simply providing a huge project for itself in implementing these ruinous so-called "flood control" methods, with no true justification for these environmentally-damaging practices.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

In peace,
Lori Ward
Co-founder, Friends of Sutter’s Landing Park

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Paula Sugarman <paulasugarman@icloud.com>
Sent: Thursday, February 22, 2024 11:45 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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

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

I am not happy about your moving ahead with this phase of the American River Project.

There must be a better way than to remove 500+ trees and put in riprap.

I live in Fair Oaks and walk and bike along the American River Parkway often. I grew up here and spent a significant part of my childhood on the Parkway. It's the jewel of our region and must be treated as such by maintaining its natural state as much as possible. I lived in Los Angeles for several years with their cement rivers. That's not what I want to see happen here.

We are in danger of losing miles of important natural habitat, regenerative green canopy and psychologically essential area for the peace of mind of the people who live near the river and access it every day.

2 I ask you to open up this phase of the work you are doing to more public input. We need to come to a better understanding and appreciation for all the elements in play; nature, flood control, quality of life.

Right now, this project is being railroaded through and that is a mistake.

Sincerely,

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)

From: mrrick@surewest.net <mrrick@surewest.net>
Sent: Thursday, February 22, 2024 11:30 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Francesca Reitano <freitano@gmail.com>; Wendy Frontiero <wfrontiero@alum.mit.edu>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)

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.

A The American River Parkway is extremely valuable to me. I've spent many happy and contemplative hours under the trees which are now threatened. At one time years ago, one could find beavers working their magic near the bank close to the Campus Commons golf course.

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.

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.

My specific concerns and comments include the following:

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.

Richard Hamilton

(resident of Sacramento and admirer of the parkway since 1962)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: JENNIFER ALKOUM <alkoum7@msn.com>
Sent: Thursday, February 22, 2024 11:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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:

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.

A

The American River Parkway is extremely valuable to me and my family. We live near Larchmont Park and use the levee, river and bike trail throughout the year for walking, biking, swimming, paddleboarding, floating and enjoying the natural beauty along the river. The proposed work in this area will suspend much of this activity for 2+ years and when the dust settles in my asthmatic lungs, the blank shores will be a sad reminder of the beauty that once was.

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.

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.

My specific concerns and comments include the following:

B

C

- No river access from the neighborhood during construction
- Noise and air pollution from the process

- Environmental effects on wildlife, trees, vegetation, river temperatures, natural habitats
- The ugly aftermath and questionable efficacy of the project, including the length of time to re-grow in the best case scenario.

My neighbors in the last few online meetings have brought up many more intelligent and valid points on why this project needs to be re-considered and scaled back. Of course we don't want floods, but we do want our river and parkway to remain intact and beautiful for all of

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.

Jennifer Alkoun

College Greens East

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: Terry and Ken <numknuckles@comcast.net>
Sent: Thursday, February 22, 2024 11:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; SPK-PAO SPK <SPK-PAO@usace.army.mil>; aashby@cityofsacramento.org; repamibera@mail.house.gov
Subject: [Non-DoD Source] 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:

We are writing to express our support for improving flood control along the lower reaches of the American River in Sacramento and to express our deep concern over the damage to the American River Parkway that will occur if current proposals by the United States Army Corps of Engineers (USACE) are implemented. The proposal has many impacts that are not adequately addressed in the SEIS/SEIR as follows:

1 USACE proposes to remove 500 trees many of which are of heritage quality along with other vegetation, which will permanently destroy sensitive habitat for the many species of mammals, birds, reptiles, fish, and amphibians that inhabit the area. USACE will also eliminate direct river access for the people of Sacramento who use the project area for recreation, observation, and as a respite from the urban environment surrounding it. The document considers this to be an unavoidable impact; which would be minimally mitigated downstream in an area that is several miles from the project site. Unfortunately, there is no alternative analysis in the document to substantiate the proposed finding.

2 In the last project, which was completed in approximately 2004/2005 along this stretch of the river, USACE and the Sacramento Area Flood Control Authority raised the levee by three feet, reinforced it with a 65 foot deep slurry wall, and buried approximately three feet of rip/rap along the stretch of levee adjacent to Larchmont Park without significant damage to this delicate ecosystem or to the public access of the area. It would seem the targeted approach to minimize these impacts taken with that project could be applied equally to this project and therefore should be evaluated in the document with equal consideration.

3 The document fails to describe the potential for increased vehicular congestion and air pollution caused by residents who previously could access the river on foot, but would have to travel to the mitigation site, which is in an area several miles away and underserved by transit.

4 The environmental document does not provide any discussion of the potential for creating a "heat island" along the south bank of the river. As evidenced by the results along the river to the east from previous phases of this project, there is no shading of the levee due to the lack of cover. Applying this solution to the proposed project would mean that the levees would now become heat sinks, especially during the

summer. Currently, the tree cover and vegetation shade the levee which minimizes solar exposure. On summer evenings the switch in the photosynthesis cycle from the existing vegetation cools the area which helps to reduce temperature in the immediate area of the levee and downwind of it. The document does not address this impact at all; neither does it consider the additional load on the regions electrical grid. Furthermore, this shade provides habitat protection for fingerling sized fish, and salmon breeding grounds. Again, there is no consideration.

5 We understand the need to protect the investment of the citizens south of the levee; after all, we are among them, as we live within 300 feet of it. We are very grateful that Congress and our representatives in state and local government have allocated funds to respond to potential for major damage to our homes. As residents of this area, we have witnessed the floods of the 1980's and 1990's when the water in our area reached to within three feet of the top of the levee. We also note that in both instances, this section of the levee withstood the onslaught with minimal erosion to the lower banks, despite the extreme flows of the river. We also understand that next time, we may not be so lucky. However, we are deeply concerned about what appears to be the attitude of USACE that we must move forward with this drastic solution as quickly as possible, as expressed recently by William Polk, Senior Project Manager, American River Erosion. There is still time to take a second look at what actually needs to be done, and to reconsider the mitigation needed to preserve the environment before moving forward, especially since there are other projects in the works, such as the increase in height of Folsom Dam, which will significantly reduce flows in the river during periods of heavy winter storms and is scheduled to be completed at approximately the same time as this one.

Thank you for your consideration.

Sincerely,

Kenneth and Theresa De Crescenzo

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 11:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on ACOE Flood Protection Projects in the American River Parkway

From: Dale T Steele <dalet.steele@gmail.com>
Sent: Thursday, February 22, 2024 11:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments on ACOE Flood Protection Projects in the American River Parkway

1 I am submitting these comments on the draft SEIS/SEIR for “Upcoming American River Erosion project “3B” environmental documents. I have lived in Midtown Sacramento for many years and am a nearly daily visitor to the American River Parkway. I am also a retired professional biologist and worked across California in wildlife conservation and recovery for sensitive species. The American River Parkway provides a unique opportunity to experience nature and outdoor recreation in an urban setting. The Parkway provides important habitat for many wildlife species as well as critical ecological services. The Parkway also serves as a corridor allowing many species to connect to other habitats in the region. Recent and proposed Army of Corps of Engineers (ACOE) flood protection erosion control projects do not adequately address these resources.

2 The American River Parkway is a gem that provides easy access to nature and recreation and is the envy of many other regions. With more annual visits than Yosemite it is important and even more so now with the challenges of species and habitat losses, climate change and other factors that add stress to our lives.

3 Regular visitors are now confronted with many barriers, detours and stark views because of flood protection erosion control projects that are underway. The loss of mature native trees and plants has been much greater than anticipated or described in planning documents provided by the ACOE. The new projects being scheduled include impacts that could result in the loss of over 500 more trees as currently proposed. Much of the proposed mitigation for these losses is expected to be away from impacted sites with a loss of recreation and nature experiences. This is not adequate mitigation for the American River Parkway which is also a designated a Wild and Scenic River.

4 I participated in public meetings and advisory capacities such as the Bank Protection Working Group during earlier ACOE flood protection projects in the Parkway. In spite of that I was surprised by the extent of mature trees and habitat impacts so far. Now, further projects are being proposed with similar impacts to trees, habitat and wildlife. Most mitigation is to be handled off-site such that existing values will be lost in areas impacted by construction. Likewise, the

cumulative impacts of all of these projects will be greater than just the sum total of disturbance. This has not been adequately addressed by the ACOE.

6

The American River Parkway is unique and must be treated as such in the development and implementation of flood protection projects. Flood protection is certainly necessary in the Sacramento region including on the American River but the ACOE has not looked broadly enough at alternatives with less impacts or put enough effort into on-site mitigation and avoidance. More effort is needed and it should make full use of the ACOE "Engineering With Nature" program to find nature based solutions that provide adequate flood protection and erosion control while preserving important wildlife, habitat and recreation values in the Parkway. The ACOE has promoted these programs for over a decade but neglected to fully embrace them with the current flood protection erosion control projects. Certainly more attention to nature based solutions is necessary in a Parkway and a Wild and Scenic River. More alternatives are needed that include such options. More review time is needed to fully evaluate the revised documents. This is necessary to reduce environmental impacts and better serve public interests.

The loss of mature native trees and existing habitat to date has yet to be fully mitigated for and it will be many years before that is possible. Even so, the ACOE is now proposing similar projects with perhaps greater impacts and further delays in achieving adequate mitigation. In a setting such as the Parkway, restoration and mitigation effort should be undertaken much in advance of impacting these limited resources. The Parkway has yet to recover, if that is possible, from past and recent impacts. That should be a priority for the ACOE before approving additional projects and further impacts.

7

I found the SEIS/SEIR documents to be poorly organized and difficult to navigate and review. There are errors and inconsistencies that need to be corrected BEFORE public review. The environmental analyses, including impact assessment for noise, air quality, recreation, and biological resources, are inconsistent in various sections of the document and misrepresent and omit numerous environmental impacts, including some that were clearly identified in public scoping.

8

More time is needed to get adequate public and agency review. Cumulative impacts from previous, existing and proposed projects must all be better documented and addressed. Mitigation must be more than adequate and emphasize on-site in kind mitigation wherever possible. Another example of the current deficiency of these proposed projects is the conversion of the Urrutia Pond into a mitigation area that doesn't adequately preserve existing natural resource values. The proposed project also does not adequately address the designated "Wild and Scenic River" status of the American River.

The American River Parkway was created over 60 years ago to preserve the area from development pressures. This farsighted action has allowed millions to enjoy the beauty and nature that remain there while recreating close to home. Unfortunately development pressure around the parkway resulted in narrow levee systems with little room for high flows from the Folsom dam. The levees around Sacramento are considered some of the most at risk in the country and a series of projects are funded and now under final approval or construction. These projects are important but so are the natural resources and recreational values of the Parkway. Impacts from these projects have already removed large numbers of trees and are applying more traditional erosion control methods. Newer methods for erosion control make use of nature based strategies including existing trees, vegetation and features. The Army Corps features their "Engineering with Nature" program broadly but the results from recent projects along the American and Sacramento rivers look like the same old armoring and clearing out of vegetation. Of all places it would seem that a regional parkway should get more natural considerations wherever possible.

Sincerely,

Dale T. Steele
Sacramento, Ca
dalet.steele@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:18 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Deborah Dodd <ddodd5@hotmail.com>
Sent: Thursday, February 22, 2024 11:00 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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

1 My name is Deborah Dodd, and I've lived in Sacramento for over thirty years. I first visited the Effie Yeaw Nature Center shortly after moving here, and my love affair with the American River and its parkway began that day. I especially enjoy walking and biking throughout the parkway, but my favorite section is the stretch between CSUS and William Pond. To say that the flood/erosion control measures that the US Army Corps of Engineers is proposing are worrisome is an understatement. It feels like yet another assault on Sacramento's wild and scenic treasure.

My two primary concerns are the impacts on the ecosystems here that have evolved over centuries and the recreational/mental health benefits afforded me and any other user of the American River and its parkway.

2 First, the clearcutting that was utilized on the projects at River Park/Paradise Beach and Sacramento State University are horrifying. The areas look like a moonscape. To utilize the same techniques further upstream will result in 11 miles of this desolate landscape. By clearcutting trees, shrubs and grasses along this stretch will annihilate the land and aquatic insects, mammals, birds, amphibians, reptiles, and fish that live here. Their habitats will take years, if ever, to return. The SEIS and SEIR that have been provided to the public do address mitigation efforts but do not indicate how long the US Army Corps of Engineers will be responsible for ensuring these efforts take hold so these habitats are restored. Will the plethora of vegetative species return? What will happen to the animal populations in the meantime? My concern here is that the USACE is taking a "one-size approach" instead of a more targeted and less destructive one.

How do you refresh your mind and spirit? I consider myself fortunate to live close to the American River and parkway. While I was teaching (I retired after 20+ years), my go-to-spot to unwind was the parkway. I found that my walks and bike rides along the trails would reinvigorate me. I have witnessed the daily nuances that occur as the vegetation changes color or thins out or fills out. I've been inspired while watching a hawk or vulture catch an air current on a beautiful spring day. I've halted in awe as two coyotes have sauntered across a field. I've observed the last moments of a dying salmon and was left contemplating the many obstacles it overcame to come back to that particular spot. These are but a very few of my experiences. This river and parkway take me out of my head; they leave me admiring and appreciating the nature that is so close-at-hand. Amazingly, this wondrous resource is free.

The USACE's proposal is threatening this treasure. I'm asking that it revise the project so it takes care of the invaluable habitats and recreational opportunities/experiences that exist for everyone. Take care of it as if it were an individual you love - with his or her own unique qualities that you would consider in detail instead of with sweeping generalizations.

Thank you,

Deborah Dodd

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: anthony lucio <anthonylucio@gmail.com>
Sent: Thursday, February 22, 2024 10:55 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

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.

A The American River Parkway is extremely valuable to me. My partner and I moved to Sacramento in the summer of 2023, and specifically chose the area near the project location because of its affordability and natural beauty no matter what direction you were coming from. We live on Howe

Ave and American River Drive, and just a ten minute walk away is one of the most beautiful trails I've seen. My partner and I aim to make Sacramento our permanent home and have already begun moving our family to the area. The ease of access to nature and the beautiful river activities that could fill our summers have been a major selling point, since most of my family loves the great outdoors just as much as I do. No longer having the beauty of the natural world in an accessible and feasible manner would be devastating to our lifestyle and the lifestyle of so many others in the area.

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.

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.

My specific concerns and comments include the following:

B

1. Recreational access 2. Environmental and socioeconomic justice 3. Impact on wildlife 4. Cultural restoration and inclusion 5. Air quality

My suggested requests:

C

1. Spot-by-spot evaluation 2. Balanced Solutions 3. Peer review and community consideration 4. Do not proceed with current plant until alternative plans are provided

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,

Anthony Lucio

anthonylucio@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:17 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Coby Field <shoogabomb@gmail.com>
Sent: Thursday, February 22, 2024 10:52 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

I was saddened and disturbed when I recently learned about the 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.

A

I recently moved to Sacramento from Southern California, and the beauty and proximity of the American River was a significant factor in my choice to move here. I walk or bike along the river several times a week for stress relief and enjoyment, and often walk my dog there.

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.

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.

My specific concerns and comments include the following:

B

- 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.

- Clear-cutting and rip rapped streambanks pose a threat to critical habitats for various fish species

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.

A. Coby Field

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Save the Trees Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: liliana ferrer <abyata@yahoo.com.mx>
Sent: Thursday, February 22, 2024 10:40 PM
To: AmRivTrees@gmail.com; liliana ferrer <abyata@yahoo.com.mx>; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Save the Trees Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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:

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.

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.

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.

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.

Liliana Ferrer

[Sent from Yahoo Mail for iPhone](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:14 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Melina Cacciurri <cacciurri@gmail.com>
Sent: Thursday, February 22, 2024 10:37 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; RichDesmond@saccounty.gov; PatHume@saccounty.gov; SupervisorKennedy@saccounty.gov; SupervisorSerna@saccounty.gov; SupervisorFrost@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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):
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.

The American River Parkway is extremely valuable to me. I purchased my home in my home in this neighborhood specifically to be close to the parkway which I enjoy several times per day with dog walking, running, biking, and enjoying our beautiful natural landscape and water resource. It's truly a unique and great treasure and

exists in very few other cities across the nation and likely the world. It took me a whole year of waiting for houses in the area to come onto the market and bidding against many buyers to finally secure my home in this neighborhood in 2017. I love seeing the wildlife, deer, coyotes, birds, large turkey's, and people catching fish during Salmon run time. This year, I had planned to get a paddleboard so I can drop it right down at the banks of the river to enjoy the serenity of being on the water. There is no replacement for natural beauty!

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.

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.

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. 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.

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.

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)).

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 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.

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). 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.

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.

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 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.

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.

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.

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.

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,
Melina Cacciurri

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Charles <mlbccd@comcast.net>
Sent: Thursday, February 22, 2024 10:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Charles C. Dallas

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:12 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Kirsten Talley <kitalley@gmail.com>
Sent: Thursday, February 22, 2024 10:06 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

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.

A The American River Parkway is extremely valuable to me. My children and I have enjoyed exploring this section of the river. We have seen many birds, deer, and other wildlife, along with many varieties of trees, the largest and most impressive of which are native and introduced oak. The tree canopy along this corridor is mature, and provides homes and protection for many animals, as well as shade for people recreating.

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.

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.

My specific concerns and comments include the following:

- B 1-The razing of the bank will decimate the local wildlife.
- B 2-The rip rap will impact the ability of certain animals, like deer, to access the river. It will also prevent humans from being able to play on the shore or easily recreate on the river.
- C 3-Removing the trees and, therefore, the developed root systems will make the banks less stable. Those roots already act as erosion protection and potential flood protection as well. Why can't we use what is already there rather than building something that may end up being no more protective?
- D 4-The proposed work will significantly impact the beauty of the area for visitors and those that live in adjacent neighborhoods. It is protected as a scenic river and I'd like it to stay scenic.

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.

Kirsten Cosand

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Eric Domek <ericdomek@gmail.com>
Sent: Thursday, February 22, 2024 10:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

Hello,

I am writing to ask that you and other 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.

A 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, especially after seeing the massive bulldozing they performed previously near Sac State and River Park.

From personal experience I have seen the rivers in other cities which almost always are quite disappointing compared to the American River. When I travel in the bay area or Los Angeles area, I am left unimpressed when I see concrete lined rivers and very unnatural waterways. Additionally I lived in Portland for a time and remember being disappointed by the lack of natural banks along the Willamette River there. In my opinion the natural banks, hidden beaches, interesting trails, mature trees, and wildlife along the American River Parkway are one of Sacramento’s most unique features and excessive bulldozing along the parkway will decrease the value of our city.

I have enjoyed recreating along the river my entire life, especially as a runner where I have jogged countless miles under the shade of the trees and exploring the many unique trails along the banks. I always found the American River parkway to be my favorite place to stay in shape in the city. From personal experience stretches of the parkway with no trees and no shade tend to become unbearably hot during the summer time. I would expect that the elimination of countless trees will leave the trails to exposed to the summer heat and

discourage people from walking, hiking, running, and biking. I believe that bulldozing of the shaded banks of the river will disincentivize many Sacramentans from going outside to be active which could reduce the health of our community.

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.

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.

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!

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to YOU in your role as county supervisors, as well as members of the SAFCA Board. 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.

Eric Domek

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Contract 3B Site

From: peace7777 <peace7777@comcast.net>
Sent: Thursday, February 22, 2024 9:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PubliccommentARCF16@water.ca.gov
Cc: peace7777@comcast.net
Subject: [Non-DoD Source] Contract 3B Site

1 Removing 750 trees along the American River Parkway stretch between Howe and Watt means robing Sacramento of one of the most used recreational areas. Hikers and bikers alike enjoy the tree shaded trails, especially in the Summer. The Parkway is the jewel of Sacramento. Removing the trees will turn it into desert. It'll not be a haven for summer hikes and other recreation activities

Samira Al-Qazzaz
5632 Nichora Way
Carmichael

Sent from my Verizon, Samsung Galaxy smartphone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:09 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Doug Arnold <doug_arnold@pacbell.net>
Sent: Thursday, February 22, 2024 9:44 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

Having lived in East Sacramento for 30 years, I have seen firsthand the evolution of the American River Parkway into the unique and priceless resource that it has become. I use it all the time...running, biking, kayaking, and photographing the abundant wildlife.

I fully understand (and support) the need to strengthen and safeguard the levees along the American River. However, having viewed your

recent presentations regarding the above referenced work, I can't help but feel that you are simply not trying hard enough to accomplish this without doing devastating harm to the Parkway.

2 I have seen firsthand the results of your work in the section between H Street and the Guy West Bridge...clumsy, brutish and totally devoid of any respect for the environmental features of the Parkway which make it so unique. Apparently your guiding philosophy is that in order to protect the levees, it's necessary to completely destroy the essential character of the surrounding area. You can surely do better. You owe it to our community to do better.

Respectfully submitted,

Doug Arnold

East Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Sarah Strand <scstrand@gmail.com>
Sent: Thursday, February 22, 2024 9:27 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; RichDesmond@saccounty.gov; PatHume@saccounty.gov; SupervisorKennedy@saccounty.gov; SupervisorSerna@saccounty.gov; SupervisorFrost@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov
Subject: [Non-DoD Source] 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):

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.

A Long before I ever moved to this area, I would drive from where I lived in Sacramento to the Sac State campus and then run along the trail to the very neighborhood where I now live. I dreamed that one day I would own a home here. It is a peaceful refuge where I can feel like I am nearby the woods even in the middle of Sacramento. The lower path that will be destroyed if this project moves forward was where I took one last walk with my dog who died of cancer. I love this area where we live BECAUSE of this beautiful American River nature area.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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 biotechnical 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.

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.
Sarah Strand
Gulfport Way

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:06 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] USACE project 3b

From: WAYNE L MONSON <monsonw@sbcglobal.net>
Sent: Thursday, February 22, 2024 9:22 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] USACE project 3b

1 | I strongly oppose USACE project 3b along the American River in Sacramento for erosion control.
At least delay it until further study to protect the vegetation better including the heritage oaks and other large trees.

I use the Rio Bravo Circle to access the river with my kayak up to 10 times a year since the 1980's.

Project 3b will not allow to use this and nearby accesses for 2 years during the project and possibly after for carrying my kayak to the river.

I do not see why this straight section of the river needs much erosion control and I believe that preserving the beauty and recreation use is far more valuable.

If the project does go through, then I want to see spot fixes with smaller equipment and no long sections of clear cutting.

Thank you from Wayne Monson resident of Sacramento

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:06 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Steve Thoreson <stevethoreson@hotmail.com>
Sent: Thursday, February 22, 2024 9:21 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

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.

I live a few blocks away from the river. I walk along it everyday. That environment is vital for the survival of a ton of wildlife. That

environment is vital to my health and emotional well being. It's beautiful and should be protected.

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.

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.

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.

Steve Thoreson

La Riviera / Larchmont area resident

Sent from [Outlook](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:05 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Dec. 2023 Draft SEIS/Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

-----Original Message-----

From: Mary E Tappel <marye.tappel@jps.net>
Sent: Thursday, February 22, 2024 9:13 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Dec. 2023 Draft SEIS/Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

- 1 Please don't move forward on the plans described in Contracts 3B and 4B ('Project' or 'Proposed Action') of the Draft SEIS/EIR, American River Common Features. This project needs to be significantly revised to retain riparian forest, especially the largest heritage-sized trees, as well as the associated fisheries resources and the area's many recreational values.
- 2 This stretch of the American River is protected by both the state and federal Wild and Scenic River Acts. This project as described would violate many portions of these laws, including 'free-flowing' and fisheries protections portions of these laws. This area is heavily used by thousands of people annually for fishing, wildlife watching, hiking, swimming, canoeing, kayaking, other recreational activities as well as relaxing and getting relief from summer heat under the riparian trees and using the existing sandy beaches for wading in the cool waters. This would not be possible with riprap.
- 3 This project also violates the American River Parkway Plan. This plan protects the existing vegetation of this area, including the riparian forest & the Shaded Riverine Aquatic (SRA) habitat needed to protect the fisheries and support recreational uses, such as hiking, wading and swimming.
- 4 The SEIR also violates CEQA, as it does not adequately disclose, analyze, or mitigate the project's significant adverse recreational, biological, visual, air quality & health or environmental justice impacts. This area is a free access much used recreational area and summer heat escape area for many people living in nearby disadvantaged communities.
- 5 The SEIR also doesn't consider reasonable alternatives to the proposed project, such as nature-based approaches. Relatively recent (Flora and Khosronejad (2021) and 2023 studies have shown trees and vegetation significantly reduce velocity of waters flowing along the banks of a river, while increasing velocities toward the center of the channel. The project proposal is based on an 2016 knowledge base, and a very similar design for the downstream River Park area

removed all of the trees within the project footprint, ignoring pledges to keep a number of trees identified by public comments on this earlier proposal.

Thank you very much for considering my comments.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:04 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Gretchen Smurr <gsmurr@sbcglobal.net>
Sent: Thursday, February 22, 2024 9:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

February 22, 2024

Gretchen Smurr

gsmurr@sbcglobal.net

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

RE: The lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

900 Chinook Salmon Fry

1 That is the approximate number of fish my students have released into the Sacramento/American rivers in the past 20 years. My sixth graders can tell you the importance of those trees shading the water and keeping it cool. Some of those students recently had the wonderful experience of visiting Nimbus Fish Hatchery and seeing the adult salmon. They were able to walk along the parkway under those beautiful oaks. Those very same sixth graders can tell you that people caused climate change. People have destroyed the original habitats for salmon that used to exist for miles and miles above where today there are dams. They can tell you of the importance of a healthy river for not only salmon but for human communities as well. They will tell you that salmon need the entire river to be cool and clean and healthy. They might even tell you that they had fun being off their phones and hiking in nature.

2 The destruction of habitat that the Army Corps of Engineers plans for the lower American River is concerning. Those tracts of land keep the water cool for salmon and they are home to river otter, coyote, deer, and beaver. As humans we have created climate change. Yet we also know (at least my sixth graders do) that trees are an essential component of at least slowing climate change. Unfortunately, this plan to make the lower American River look like the Los Angeles River, is not taking any of that science under consideration. Any time I have the unfortunate experience of crossing the river near Sacramento State, I see the ugly, barren, concrete wasteland that the Army Corps has made of that stretch of the river. How hot will that water be in the summer with no trees to shade it? Is the Army Corps of Engineer marking the end of the Chinook Salmon run that we have tried for so many years to support? The water in summer, without cooling trees, will be too hot for them to survive. What of the other animals in that habitat? A county park ranger had even told me he saw a bobcat along the portion of the river the Army Corps plans to destroy.

Many communities in recent years have been celebrating the wonders of their natural habitats. People have been restoring rivers. They are actually discussing trying to bring the Los Angeles River back to life. Yet here, we are planning on destroying heritage oaks, destroying one of the most wonderful urban wild spaces in the country? That is so sad so backward thinking.

I am not going into the details of the plans and what can be done differently as my brother (Douglas Smurr) and my mother (Claire Smurr) have done that in their letters. As someone who now teaches in West Sacramento by the weir on River Road, I know there are other ways to control the possible flood problems that we humans have created due to our addiction to fossil fuels.

I urge the US Army Corps of Engineers to move into the modern age. An age where we respect the ancient heritage oaks and the wonderful environment that they create for the wildlife. I would hope that instead of destruction we can ensure that this wonderful environment continues to exist into the future, so that my students can show their children a salmon in the river.

Respectfully submitted,

Gretchen Smurr

MA Ed, NBCT

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:04 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: opposition to Lower American river devastating project

From: richard jones <eyesite@gmail.com>
Sent: Thursday, February 22, 2024 8:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] opposition to Lower American river devastating project

I am strongly against the unnecessary and draconian lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

1 | Why is it needed... the levy was strengthened with excavation and bentonite about 15 years ago?

2 | The best erosion prevention is the present foliage.
You past project near CSUS was a complete clear cutting of a once beautiful river forest... It is shocking and ugly scar, and the planners and contractor should be ashamed of the damage they have done aesthetically and environmentally
The American River parkway is a masterpiece of forests and riverbank... Your plan is a brutal desecration of it.

3 Please go back to the planning states reconsider and revise Give us proof that it is really needed, or is it just grant money you need to spend and union construction businesses that are pushing for this scorched earth project. ?

It is not necessary, it is waste of taxpayer money, it will be an ugly construction project displacing wildlife and park going citizens.

4 I have lived in this area for 35 years near the levy and have witnessed several high-water events. The trees actually help to protect the banks.

Stop this project now and go back to the drawing boards to find a less devastating solution that does not desecrate our peaceful river.

Richard Jones MD

Richard A. Jones
Eyesite@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:03 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

-----Original Message-----

From: Jennifer Dunmire <jdunmire@att.net>
Sent: Thursday, February 22, 2024 8:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

Dear Folks at the Army Corps of Engineers,

I know this is almost the end of the time for public comment on the levee work on the American River Parkway.

1 I am very concerned at the number of trees that are being removed from the levee areas. Mature trees are crucial for holding the soil with their extensive root structures. I am glad to see the planting of the Elderberry, blackberries, wild roses, and other native plants that the ACE have been doing. I feel the addition of these native plants to the levee is a good thing, but the removal of trees is unwise and does not follow the scientific research that shows that mature trees hold the soil, help prevent erosion and runoff into the river.

Thank you.
Sincerely, Jennifer Dunmire

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:02 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River parkway /Levee proposal

-----Original Message-----

From: Cindyelliott <ewbug@sbcglobal.net>
Sent: Thursday, February 22, 2024 8:39 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River parkway /Levee proposal

Dear US Army Corps,

- > It is hard to believe in this day and age...
- > What is wrong with the US Army corps of Engineers? Why are they here and Why were they hired for this project? They specialize in engineer regiment, military construction and civil works... Are they creative, brilliant or skilled enough to engineer an environmentally healthy and sustainable way to upgrade the levee ???
- > There must be agencies that specialize in building levees with the environment in mind.
- 1 | > The trees, and Surrounding environment have been around for hundreds of years and deserve to be respected, protected and taken care of. They are a huge part of the ecosystem for this precious river and its surroundings!
- 2 | > The American river is the largest river in a metropolitan area in the United States "it needs to be protected from unnecessary development under the "California Wild and Scenic River Act" The "River Act" an act which passed by Congress in 1968, under California law states "rivers which possess extraordinary scenic, recreational, fishing and wildlife values shall be preserved in their free flowing state, together with their immediate environment, for the benefit and enjoyment of the people of the state"
- > It seems to me these brilliant US Army Corps of Engineers are, or should be educated and talented enough to figure out and design a levee that protects the valley WITHOUT destroying the grandfathered trees, shrubs and surrounding environment.
- > These engineers are probably not from the Sacramento area and are just doing their job without conscientiously thinking about local impact or concerned much about what a devastating act they are creating. They are choosing the easy, unethical and uncreative way to just "solve" the situation and project, Which may not even be a problem.. while collecting HUGE sums of money from the Federal Government.

- > It would take much more creativity and effort to figure out how to secure the new levee and protect the involved environment.
- > How can this deforestation be an acceptable solution in this day and age...by
- > adding to the threat of global warming. Without trees or shade for miles along the river natural habitats will suffer and die off.
- > The forest root structure and growth pattern of these 100-300 year old trees are actually helping keep the soil in place and controlling the river from eroding with their massive underground roots and growth infrastructure.
- > This is a disaster waiting to happen!!
- > The scariest part is the plan to continue to create mass devastation with this new levee design. We haven't even witnessed yet what will happen until the spring melt off and high river flow occurs!
- > This plan would cause destruction without any regards to the Rivers Rights and OUR Right to enjoy it in it's natural state?
- > STOP destroying our wonderful river habitat, scenic beauty and wonderful playground!
- > Who approved the project?
- > Who is backing it?
- > Who is getting massive kickback?
- > Is there a time limit to spend the billions of dollars allocated for this project before it's too late?
- > Removing all the trees and forest to protect the levee??? Really?
- > THERE IS A BETTER WAY!!!

Thank for your time
Cindy Elliott

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:01 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Erosion Protection Project on Contract 3B site

From: Account Suspension <ejs456@sbcglobal.net>
Sent: Thursday, February 22, 2024 8:36 PM
To: ARCF16@water.csa.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Erosion Protection Project on Contract 3B site

1

I have just learned about the COE erosion control project in today's article in the Feb. 22 Sacramento Bee. It is difficult for me to believe that the COE has not learned how to construct an erosion control project that does not destroy the riparian canopy. This canopy is necessary for temperature control and providing nutrient recycling for the fisheries. This project needs to be redesigned to incorporate vegetation that would benefit the natural systems.

Sincerely,

Edward J; Schmit
Registered Civil Engineer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Barbara Beeman <butterfingrz@gmail.com>
Sent: Thursday, February 22, 2024 8:24 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

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.

A As a resident of Sacramento County for the past 36 years the American River Parkway has been an integral part of my life and is such an incredible asset to the community it's known as the "The Jewel of Sacramento". For not only myself but for an overwhelming number of residents it's where we go to experience the natural beauty of the area, appreciate the environment including the habitat, plants, many animals, and also for personal recharge and refuge. To destroy this asset is to strike

at the soul of Sacramento. The issue is not erosion control, which is definitely needed, but the most effective way that erosion control be implemented without the incredible destruction of the current plan.

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.

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.

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.\

These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Barbara Beeman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 10:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Linda Schroeder <lindajerry1@gmail.com>
Sent: Thursday, February 22, 2024 8:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

A I have lived by the American River since 1986. I am now 81, and I still like to walk on the trails. It feeds my body and my soul. I also could be subject to flooding if the levee is impacted, but I think the proposed methods are too extreme under the current circumstances.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Linda and Jerry Schroeder

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] 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

From: kensp@aol.com <kenasp@aol.com>
Sent: Thursday, February 22, 2024 8:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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

To: ARCF_SEIS@usace.army.mil

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

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):

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.

A While I live in southern California, my brother and his family live within 100 yards of the American River. I have walked this area many times and always admire its beauty. My brother and his family use the river for recreation, exercise, hiking, kayaking, paddle boarding, fishing and simply peace and quiet in a beautiful setting. Their dog swims in the river almost every day.

B The USACE has tried to justify this project on the basis of potential erosion. While that may pertain to a few areas along the river, it does not pertain to most of the river. Yet the the project calls for the removal of 500 mature trees and other plants, and will disrupt the use of parks and neighboring schools. Do you remember you high school biology? Plants, especially trees, remove carbon dioxide (CO₂) from the air for photosynthesis. In the process the flora release oxygen into the atmosphere. This is desirable, especially for a planet concerned about global warming, climate change and carbon footprint. Besides depriving the area of plant life which is essential for survival, the bulldozers will have the opposite effect.

C The American River also provides a habitat for thousands of species of birds, waterfowl, otters, beavers, deer and migratory animals. Presently the river provides a home and habitat for all these creatures, as well as the human residents who live nearby. It is also a pristine and wonderful recreational area enjoyed by thousands of Sacramento residents as well as visitors like myself.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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.

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.

Please don't turn this beautiful area into the LA River.

Thank you.

Kenneth F. Spaulding Jr., MD

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:05 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Regarding the planned bulldozing of trees and environmental habitat instead of using selective environmental erosion protection on this designated scenic river parkway.

From: Barbara Domek <barbjds@yahoo.com>
Sent: Thursday, February 22, 2024 3:00 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] Regarding the planned bulldozing of trees and environmental habitat instead of using selective environmental erosion protection on this designated scenic river parkway.

Dear All,

I have run, hiked and even proposed to my wife on this parkway. Family hikes were always awesome.

1 | Why in the world would the ACE use methods similar to ACE work done on the LA river back in the 30s and 40s (you know, destruction and cement and an LA river that looks like a big gutter). Now instead of cement used back then, ACE is using bulldozers, chainsaws to destroy riparian habitat...and replacing it with rocks and brown carpet in many areas. The mitigation will take at least a decade to bring back the scenicness.

2 | The ACE has many selective environmental options at its disposal for flood and erosion control...plantings of deep rooted grasses and soil grabbing roots of riparian trees. If those were just added to the current trees and grasses that have stood the test of time, there would be no need for the massively destructive current project. The natural rooting of those trees and grasses would be sentinels guarding against flooding and erosion. Plus, the ACE is already preparing Folsom Dam for better control against high CFS releases. The improved control of releases is also enhanced by better
3 | forecasting of major weather events..

4 | If the ACE needs to do flood control, the work could be centered on the levees: reinforced by slurry walls and extra supply of dirt on either side to fortify the levee. Any extra dirt fortification could still be planted with grasses.

Sincerely, Joe Domek.

Sadly, It will take at least a decade to undo the environmental damage for these sections of the river to be scenic again.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:07 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Lisa Sanchez <lisa.j.sanchez02@gmail.com>
Sent: Thursday, February 22, 2024 3:09 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

A | This is an absolutely beautiful area and find it surprising that demolishing the natural vegetation is the option that has been chosen. There has to be a better way to complete these needed requirements without denuding the entire area.

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.

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

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Lisa Sanchez

A citizen who enjoys the many trees, shade, and natural vegetation that the American River and the Parkway provides.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:06 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: Vicki Meyer <vlmeyer@yahoo.com>
Sent: Thursday, February 22, 2024 3:02 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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 and Dept. of Water Resources Comment Recipients:

- 1 I want to express my concerns with the lower American River projects, especially, Contract 3B. My backyard gate opens onto the American River levee about .5 miles east of Watt Avenue. I moved into this property in 1998 because it backed up to the greenbelt. I am a lover of nature and have multiple birdfeeders in my backyard. I love watching the birds and giving them a place to congregate for food. Often times people walking on the levee will stop and watch them. I would like to think it brings them as much joy as it does me. My concern is the massive disruption to the riparian ecosystem this project will create right behind my house – no flora, no fauna.
- 2 In 1985, I moved into a house on Mira del Rio Drive, just a few houses from the levee. I was there for the flood of 1986 when the water came within inches from the top of the levee near me. I was very nervous, but the levee held. We did have a long stretch of rain, but the situation at Folsom Lake was exacerbated by the failure of the Auburn cofferdam which suddenly released 180,000 acre feet into the lake adding raising even higher and already full reservoir. With the addition of the cement slurry wall down the center of the levee, I felt reassured that the levee in our area could withstand another 200 year flood. If the risk of flooding is so high along my section of the river, why am I not required to have flood insurance?
- 3 Is the clearcut approach to flood safety the only way? My understanding is that removal of vegetation increases the risk of flooding. We are always being warned of the increased risk of flooding and mudslides in areas where forest fires have destroyed the vegetation.
- 4 The lower American River was designated a Wild and Scenic River both by the Department of Interior and the state of California in 1981. This designation results in a prohibition of Federal construction, assistance, or licensing of water projects adversely affecting the characteristics qualifying the river for the national system. Certainly, this project would

have extreme effects on the beauty and riparian habitats of one of the few wild and scenic rivers that flows through a US city.

5

Finally, I have read that the erosion analysis of project 3B on the American River was based upon current required flows from Folsom dam during a 200 year flood event. The current project raising the height of Folsom dam and surrounding levels will be completed in 2027. At that point in time, the flows would be reduced to 115,000 cfs. This begs the question, is this project still necessary.

I implore you, please re-evaluate if there are natural solutions or, in light of the raising of Folsom dam, whether this project is needed at all.

Thank you,

Vicki Meyer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:04 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Opposition to the proposed American River Parkway work

-----Original Message-----

From: Melissa Gates <melissa.gatesdvm@gmail.com>
Sent: Thursday, February 22, 2024 2:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Opposition to the proposed American River Parkway work

1 | I am strongly opposed to the unnecessary levee work proposed along the American River Parkway. This will damage sensitive and vital riparian habitat that supports hundreds of species of birds and other wildlife. These species are already facing severe population decline due to habitat loss, and removing these trees and other brush will further stress these sensitive species. Migratory and native birds as well as mammal species need this habitat to survive.

Please do not destroy it.

Melissa Gates

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 4:02 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Polly Murphy-Jones <pollymj@mac.com>
Sent: Thursday, February 22, 2024 2:45 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

A I have biked, run & walked along the American River Parkway for over 30 years, so I am very familiar with the area targeted in the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

For the past 11 years, I choose to walk along the dirt hiking & equestrian trails at this section of the Parkway, from Howe to Rio Americano, several times a week. Why do I choose this part of the parkway, when I used to park at Wm Pond & cross the bridge to River Bend park? Because this section of the river has the most beautiful & huge oak trees for shade, which is valuable not just for individuals, but for cooling our increasingly hot valley, providing habitat and nourishment for birds & wildlife, and for **EROSION Control**. The willows, cottonwoods, alders, buckeye, elderberry trees, blackberries & other plants offer more shade & habitat, and much needed humidity, as well as more **Erosion Control**, and any along the river banks that topple over in a high wind offer additional habitat for fish, turtles, ducks etc.

B The miles of destruction of all of these plants will inevitably lead to a huge impact upon all wildlife; there's nothing for miles downstream, due to previous work, so upstream habitat will be crowded, with more people, as well. Now if the Army Corps has found a new way to grow 300 year old oak trees in just 1-2 years, and can replace 100 yr old cottonwoods in a year's time with cottonwoods with similarly huge roots, well, the project's restoration plan for remediation will be acceptable. However, looking at the finished section near CSUS/golf course, the final impact is bleak & will continue to offer little habitat or respite for decades.

Therefore, 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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.
Polly Murphy Jones

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Thursday, February 22, 2024 3:20 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) - December 2023 Report and Appendices

From: ronald.a.hall@sbcglobal.net <ronald.a.hall@sbcglobal.net>
Sent: Thursday, February 22, 2024 3:15 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
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

You don't often get email from ronald.a.hall@sbcglobal.net. [Learn why this is important](#)

1 As a resident who lives about 1 mile from the American River in Rosemont, I appreciate all the work that has been done to make the area safe from devastating floods. The additional proposed levee work will undoubtedly enhance safety, but this needs to be balanced against the environmental and scenic damage caused by the work. In particular, the river upstream of the Watt Ave bridge, which is perhaps the most beautiful section of the American River between the Hazel Ave bridge and Discovery Park, will be severely degraded. I urge you to consider reducing the number of trees that have to be removed,

Thank you, Ronald Hall

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:44 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Proposed Flood Control Measures, American River Parkway (Howe Av/Watt Av Vicinity)

From: Keri Miner <handwing2011@yahoo.com>
Sent: Thursday, February 22, 2024 2:41 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Proposed Flood Control Measures, American River Parkway (Howe Av/Watt Av Vicinity)

The draft SEIS/SEIR contains multiple serious flaws that must be addressed to meet the legal and procedural requirements of NEPA and CEQA. The process for involving the public and responsible agencies was inadequate to meaningfully involve them in the planning process. The SEIS/SEIR document is so poorly organized and presented that has been nearly impossible for all but the most experienced reviewers to navigate and understand.

1 The document also is replete with errors and inconsistencies among various sections in describing the project and its impacts. The range of alternatives considered is artificially narrow, with no meaningful alternatives presented or evaluated for bank protection methods or mitigation site locations. The environmental analyses, including impact assessment for noise, air quality, recreation, and biological resources, are inconsistent in various sections of the document and misrepresent and omit numerous environmental impacts, including some that were clearly identified in public scoping. In particular, the impacts of bank protection to existing oak woodland and riparian habitat, and associated wildlife and recreation use, and the effects of converting the Urrutia Pond to a mitigation area are either mischaracterized or ignored.

2 In short, the extensive deficiencies I and others have documented demonstrate that the document is inadequate to meet the legal requirements for public review under NEPA and CEQA. We request that the project partners reissue a new draft SEIS/SEIR that addresses the multiple deficiencies of this document, so that responsible agencies and the public can have meaningful input to the process, as is legally required. Should the project agencies not reissue the supplement, you should prepare an extensively revised version of the document that is organized in a comprehensible way and that fully corrects the many sufficiencies in the document, so we can properly evaluate its legal adequacy. More importantly, it should propose alternative actions that will reduce environmental impacts and serve the public interest.

Sincerely,

Keri Miner
Carmichael, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Concerns with Unnecessary Work for USACE's Project 3b on the American River

From: Alicia Eastvold <aliciaeastvold@gmail.com>
Sent: Thursday, February 22, 2024 8:14 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Jonah.Knapp@cvflood.ca.gov; BellasE@saccounty.net; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; RichDesmond@saccounty.gov; PatHume@saccounty.gov; SupervisorKennedy@saccounty.gov; SupervisorSerna@saccounty.gov; Matthew.Ceccato@mail.house.gov; repamibera@mail.house.gov; amrivtrees@gmail.com
Subject: [Non-DoD Source] Concerns with Unnecessary Work for USACE's Project 3b on the American River

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

I am requesting that the plans for Project 3b on the American River be halted until more time and evidence is in place. I am concerned for the following reasons:

- 1) **The trees improve protection from erosion rather than reduce it.**
 - a. When the trees are removed, it makes the riverbanks more vulnerable.
 - b. The roots and trees absorb water, protect the soil, and help stabilize the bank.
 - c. They add organic matter to the soil that produces sticky EPS compounds, working as soil glue. The more this EPS content increases in soil from roots, soil erodibility decreases.
 - d. This is information that the US Army Corps currently utilizes and teaches engineers in its reviews of levee vegetation. <https://ewn.erdc.dren.mil/research/project/design-and-assessment-guidance-for-vegetation-on-riverside-levees-with-ecosystem-and-engineering-benefits/>
- 2) **The revetment work downriver in Contract 1 & 2 needs more time to prove itself before being implemented upstream.**
 - a. Observations of the soil-covered revetments and planting benches show how they have been washed out after recent rains. This is because there is no natural vegetative armoring, which will take years to re-grow.

b. Observations of the soil along the banks of Contract 1 & 2 show it being rapidly washed away by rain and average river flow. This is not happening in areas with natural riverbanks. This suggests that the project work might bring more erosion until the vegetation grows in, which will take years.
Pictures included below.

3) **When the Folsom Dam raise is complete in 2027, the work may be excessive and unnecessary.**

a. The **project is built around protecting from erosion resulting from 160,000cfs** releases from the dam. But modeling indicates that **after the dam is raised**, a maximum discharge for a 200-year flood event into the American River **“would not exceed 115,000cfs.”** (SAFCA’s Final Urban Level of Flood Protection Plan & Adequate Progress Baseline Report, Pg

3), https://sacramento.granicus.com/MetaViewer.php?view_id=21&event_id=4483&meta_id=701143)

b. When the dam raise is complete, the Folsom Dam Water Control Manual “will be adjusted again to reflect the increased reservoir storage capacity.” The work should not be completed before this.

4) **In the meantime, the combination of the above factors would make the riverbanks of Project 3b doubly vulnerable to erosion:**

a. In a significant event, the Folsom Dam still operates at a higher release (160,000cfs) until the dam is raised.

b. With vegetation not established, revetment is likely to erode, especially from a higher release event.

The plans for Project 3b include tree removal that once complete, cannot be reversed, or repaired. With the riverfront riparian habitat being such an asset to the community and our ecosystem, we believe the USACE must make certain that the work is indeed necessary.

Sincerely,

Alicia Eastvold

Larchmont Community Resident

aliciaeastvold@gmail.com



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:57 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Mystery Jam Animates <mysteriousjam719@gmail.com>
Sent: Thursday, February 22, 2024 8:15 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com; Elton Grau <eltongrau@gmail.com>
Subject: [Non-DoD Source] 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 | Hello, my name is Benjamin Grau and I am 18 years old and I have serious doubts about your reasons for removing ALL
2 | 500 trees because of erosion control. With the immature planting and the 2 years of construction it seems like this
whole project could cause significantly more harm than good. Additionally, this river is one of the focal points of our
community, removing the trees and walking path is like taking down a monument. Beyond that, this environment is the
ecosystem to many birds and small animals, destroying this habitat will ruin the biodiversity of this area and make it
more susceptible to disease and any potential invasive species. I strongly urge your organization to reconsider this
proposal and consider alternative methods for erosion control. Thank you for your time.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:54 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features Project: We Deserve Better

From: Alicia Eastvold <aliciaeastvold@gmail.com>
Sent: Thursday, February 22, 2024 8:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: amrivtrees@gmail.com; jonah.knapp@cvflood.ca.gov; SorgenKC@saccounty.gov; Susan_Rosebrough@nps.gov; Barbara_Rice@nps.gov; hbwillia44@gmail.com; oped@sacbee.com
Subject: [Non-DoD Source] American River Common Features Project: We Deserve Better

Dear USACE and Dept of Water Resources and Related Agencies:

Maya Angelou said, “Do the best you can until you know better. Then, when you know better, do better.” I am choosing to assume the US Army Corps did the best they could with their original design for the American River Common Features that was finalized in 2016 that plans to remove 2 miles of riverfront and 700 trees. But since then, new information—in particular the Corps’ own seminal [Engineering with Nature](#) program—has emerged. I ask USACE to consider this new information. Furthermore, in 2022 the Biden-Harris administration announced its “[Nature-Based Solutions Roadmap](#)” directing all of its agencies to implement nature-based solutions with each of its projects, and also unlocked \$25B in funding for this purpose.

It’s time to revisit this project and do better. I am requesting a revised approach that follows your own 5 foundational principles that you developed and celebrate as best practice for successful flood risk management projects. These principles are central to your celebrated and authored [International Guidelines on Nature and Nature-Based Features \(NNBF\) for Flood Risk Management](#) and illustrated in your [2 Volume Engineering with Nature Atlas](#). As a concerned citizen, I also celebrate these principles because they provide a path that is a **win-win-win for flood protection, our environment, and our community.**

I request you implement Principal 1: Use a Systems Approach to Leverage Existing Components and Projects and their Interconnectivity.

- The introduction to USACE’s NNBF guidelines encourages designers to find solutions that consider the “**interconnected systems** in which the components and projects, **both existing and future**, may reside.” The NNBF guidelines also asks designers to “consider that the processes and systems are often **more extensive** than

any initially defined project scope or area” so that the plan can identify “ways to reduce conflict and maximize synergies to produce sustainable solutions,” (Bridges et al., 2021, p. 22). Inconsistent with NNBF guidelines, USACE failed to consider many components in the existing project plan:

- Your recent [related work on the Folsom Dam updates](#) include the spillway and enhanced forecasting technology that allow for more accurate and early water releases when storm surges occur. This helps prevent the need for high releases that the project is designed around.
- The soon-to-be-completed raise to the Folsom dam that you are overseeing is expected to reduce the maximum release to 115,000cfs (as per [SAFCA’s Final Urban Level of Flood Protection Plan & Adequate Progress Baseline Report, Pg 3](#)). The project is modeled off of 160,000cfs releases.
- I request the USACE to **review its prior modeling data to incorporate the new information that will result from your related work on the Folsom Dam and spillway improvements.**

I request you implement Principle 2: Engage communities, stakeholders, partners and multidisciplinary team members to develop innovative solutions.

The NNBF guidelines state that “**early and frequent engagement with stakeholders and affected communities is central to innovation**” and that it is critical to “gathering all **pertinent information** and strategies.” You share that it is important to design solutions that fit the communities’ circumstances “because **one size does not fit all,**” (Bridges et al., 2021, p. 23).

Instead,

- The community in the areas affected by this project **only received outreach by postcard** mid-December 2023. There were **no posters put up at key river access points or parks to help the community understand the scope of the project.** We were given limited time to study thousands of pages of documents to understand the work in order to develop and share concerns.
- There were only two public engagements, conducted online, in which the USACE presentation contained technical issues that prevented the community from being able to hear or see key elements of the project (note that the current recordings posted [on your website](#) updated the video and audio and do not capture the technical difficulties we experienced). On both occasions the **community asked for more details**, particularly around which trees were slated for removal and the specific path for the construction and staging area, as well as an **in-person site walk-through** before the comment period closed.
- **No in-person meeting was offered** before the public comment period closed, a critical time for the public to get questions answered and concerns addressed.
- **The reports continue to lack critical details**, such as the specific trees identified for removal, the path of construction equipment. (*Note: the USACE website did provide a [diagram on 2/16/24](#) of trees surveyed, but it does not clarify which trees will be removed*).
- There are several partners and stakeholder groups with both knowledge and concerns for work on this stretch of river, such as Save the American River Association, American River Parkway Foundation, the Sierra Club, and others. No indication has been made that these groups were engaged with for collaboration or communication.
- Our community was not informed or invited to submit public comment on the environmental impact of the Folsom Dam Water Control Manual that determined 160,000cfs as its maximum release value. This decision results in significant vulnerabilities to our community and is the premise of the work of Project 3b.
- The result has been a concerned and frustrated community that has had to gather information to answer its own questions.

o In my review of the USACE's Engineering with Nature Atlas Volume 2, I saw many examples that highlight the principle above. I traced the communication and collaboration for one of your highlighted projects: **Dry Creek in Healdsburg, California.**

- The project provided the community with detailed work plans including budgets and [high-resolution maps](#) of vegetation, construction and impacted areas.
- In the Engineering with Nature Atlas, you share that you collaborated with local partners like the National Marine Fisheries Service, and the California Department of Fish and Wildlife to inform the project. You also held not just public meetings, but nonstandard estates and demonstrations to “develop broad support” for your project, which gained strong support from the neighboring landowners (*Engineering with Nature Vol 2, pg 227*).
- **This level of detail and engagement that we see in your Dry Creek project is what our community expects from this project: specific work plans with maps for exact trees slated for removal, budgets, and construction paths.**

I request you implement Principle 3: Identify sustainable and resilient solutions that produce multiple benefits.

Your work outlines that sustainable solutions will “enhance quality of human life, advance social equity and increase environmental integrity” and that nature-based solutions help address this while mitigating environmental threats. You outline that a quality project has **co-benefits such as habitats, fisheries, carbon storage, tourism, recreation and water quality management**” (Bridges et al., 2021, p. 23-24).

Instead:

- Contract 3B is slated to remove almost 700 trees and 2 miles of riverfront, which plays a critical role in our community:
- The trees provide a habitat for countless birds and wildlife.
- The river parkway and river are regularly used by locals and tourists for running, biking, boating, and swimming. The tree canopy that creates its natural habitat makes visits to it the number one outdoor activity according to the [Sacramento Convention and Visitors Bureau](#).
- The above traits are the essence of why the river is designated a Wild and Scenic River and are all placed in jeopardy by your work.
- The landscape provides an essential green space that is critical to the mental health of the community as a place to gather people and bring respite from the city. It is also critical for low-income families who count on the riverfront as a cool place to gather and rest on the increasingly hot summer days.
- **Contract 3B results in the opposite of co-benefits: there are only losses of the riverfront elements that enhance quality of life, advance social equity or increase environmental integrity.**
- Yet in the Dry Creek example highlighted above,
- The work completed not only helped with flood risk management, it **improved the aesthetic and environmental value so significantly** that the project became an **attraction that is increasing tourism** in the area and resulting in **additional economic benefits**. (*Engineering with Nature Vol 2, pg 227*).
- **We deserve a project that increases the socio-economic and environmental benefits rather than destroys them.**

I request you implement Principle 4: Anticipate, evaluate and manage risk in project or system performance.

- Your work explains that there are many approaches to flood risk management and that “**risk and uncertainty should be embraced and actively managed**” because the alternate approach “encourages **overengineering** and a reversion to traditional structural measures”. You highlight that these approaches may have complexity, but

that traditional approaches have limited outcomes and “hinder the development of more resilient practices with multiple additional co-benefits” (Bridges et al., 2021, p. 23-24).

Instead,

- As mentioned above, Contract 3B designs around unnecessarily high measurements for Folsom Dam discharge (160,000cfs) when 115,000cfs is the expected 200-year flood maximum discharge. ([SAFCA’s Final Urban Level of Flood Protection Plan & Adequate Progress Baseline Report](#), Pg 3)
- There is a one-size-fits-all approach to the project that lacks the necessary complexity or consideration for natural features such as heritage oaks, natural beaches, and critical habitats that will be fundamentally irreparable once the work is complete.
- There is no approach beyond launchable rock toes, rock trenches or rip-rap banks for any portion of the project.
- Your current work on the [LA River Restoration](#) is an example of the blight of the original over-engineered approach in an effort to uniformly mitigate risk. It is also an example of the efforts and costs required to attempt to restore the river to its natural habitat. **We do not want a project that turns our Wild and Scenic River into a canal that no amount of money could repair to its authentic natural state. We want a project that includes an alternative, nature-based approach based on more active management than the current measure that involves rip-rap.**

I request you implement Principle 5: Expect Change and Manage Adaptively:

In your textbook, you explain that the traditional approach of “build and forget” does not consider the many uncertainties that arise around a project. To prepare for this, a good project is expected to “**anticipate and embrace change**” and do this “**early and often**” and **build an “adaptive management plan.”**

Instead:

- Contract 3B continues to be designed around **dated modeling from 2016 or earlier** when newer technology and better resulting data can inform the work. Meanwhile,
- **Better forecasting and water management practices exist** as a result of the Folsom Dam improvements which [reduce the expected water releases](#) that the project was built upon.
- **Better water velocity modeling exists** for the area of Project 3b that shows the necessary detail required to make more informed decisions about where actual erosion control methods would be needed. (i.e, Final 2017 LAR Streambank Erosion Monitoring report’s Velocity Contours).
- **New evidence needs to be considered** around the impact of the methods slated for Contract 3B. As residents, we are seeing with our own eyes with the completed work for Contracts 1 and 2 by the H Street bridge and Paradise Beach that soil covered revetments and along the river banks is washing away with moderate rains and river flow.
- **Better understandings and methods for implementing nature-based solutions exist, all of which have been developed and initiated by the Army Corps itself.**
- The public continues to express their concern and desire for a less destructive approach. They do this, because as Dr. Todd Bridges, the USACE leader of the Engineering with Nature initiative shared in his [1/17/19 opening remarks](#) to the introduction of the first EWN Atlas,

*“The majority of people do not view projects through the lens of equations and data tables...
They view projects with their eyes. Projects are what they see and what they see it doing.”*

What we view with our eyes is a project that will fundamentally alter a landscape, taking with it irreplaceable trees, some of which are as old as our country, along with all the creatures that rest and live in its shade. What we view with our eyes is the vanishing of one of our last green spaces, after we’ve lost our forests to fires and grasslands to tract homes. What we see the project doing is irreparably dismantling our riverfront, which is built into the fabric of our community.

So, **we want you to work harder.** Use the concerns we have raised to work with the community and create a plan that is both resilient and sustainable. Imagine something better than what we are seeing. And then show it to us.

Sincerely,
Alicia Eastvold, Larchmont Neighborhood Resident

[UPDATED] Central Valley Flood Protection Board (Click to view/send)

Carla Dillinger <rachaelunrest@icloud.com>

Thu 2/22/2024 8:18 PM

To: Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>

Cc: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>

[You don't often get email from rachaelunrest@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear President Dolan and Members of the Board and Staff:

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.

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 questions 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.

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.

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.

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.

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.

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.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Cynthia Box <garycbox@gmail.com>
Sent: Thursday, February 22, 2024 8:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Cindy Box

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Elton Grau <eltongrau@gmail.com>
Sent: Thursday, February 22, 2024 8:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

A | I am an avid runner and use the American River Trails to run. 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. 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. 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.

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.

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.

Elton Grau

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Scarlett Grau <scarlettgrau22@gmail.com>
Sent: Thursday, February 22, 2024 8:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] 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 and Dept. of Water Resources, my name is Scarlett.

I am 13 years old. I find the American River extremely important to me. A lot of wildlife lives there and by removing all of those trees you are killing those animals. I do not support your methods that are being proposed.

1 In fact, I think these methods are not helpful at all. The tree's roots help with erosion control and by removing these trees it is increasing soil erosion rates. This may increase chances of floods happening which is even worse for animals and people that may live near here. Also, if you cut down these trees you are admitting more greenhouse gases into the atmosphere. Cutting down these trees will make the area way less lively and it will upset other people.

There are other ways to go about this without completely destroying the environment. By doing this it will have a negative effect on so many people and animals. I will not support you guys in doing this.

Thank you for listening to me.

-Scarlett Grau

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Tommy Thomas <thomasdrakegrau206@gmail.com>
Sent: Thursday, February 22, 2024 7:54 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] 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 Army corps of engineers,

1 | Hello, my name is Tommy Grau, I am 11 years old. I enjoy using the American River. I heard you are going to cut down 500 trees. Please don't cut down these 500 trees. I do not approve of birds' homes being destroyed by your organization.

I believe less people will go to the American River if you cut down these beautiful trees. And it won't look as nice as before. Please do not cut down the trees on the American River and find a less problematic way to control the river.

Thank you for listening to me.

Tommy Grau

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:50 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Paul Selsky <pselsky@surewest.net>
Sent: Thursday, February 22, 2024 7:47 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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

1 The American River Parkway and its woods and wildlife are extremely valuable to me. I regularly run on the American River bike trail with the 300 member running club I belong to called SacFit. We enjoy the unique scenic beauty of the American River Parkway.

I object to any loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; including the loss of quality and access for recreation (running, 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.

The American River Parkway provides wilderness-quality natural and recreational opportunities. I request that all efforts be made to ensure the preservation of these benefits are given the highest priority.

Sincerely,
Paul Selsky

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 23, 2024 9:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Karen Jacques <threegables1819@gmail.com>
Sent: Thursday, February 22, 2024 7:47 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

A My comments focus on the lower American River components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. This entire area of the American River is designated as a Wild and Scenic River (Federal Register Vol 46 No 15 January 23, 1981) It is often called the "Crown Jewel of Sacramento" and is loved by thousands of Sacramento residents, including me. I love it for the river itself, for its native trees including Sycamore, Cottonwood, Black Walnut and Oak trees (some of the native Oaks are huge and may be 200 or 300 years old), and for the wide variety of wildlife that it shelters and that call it home. It is wonderful to have such a beautiful, wild place so close to city residents. I have seen what the previous USACE erosion projects (Paradise Beach and Sacramento State University) look like now and I am saddened and appalled. What this once beautiful riparian habitat has been turned into a dead zone with bare, lifeless soil, riprap and 'rock toes'. While some vegetation will likely grow there again someday, it will take lifetimes, if ever, to replace the tree canopy. If Contract 3B (and the 4A and 4B Contracts) move ahead as planned, close to eleven miles of the twenty-six mile American River Parkway be have been devastated and, due to tree loss, will not return to what it was for generations, if ever.

B The level of destruction that would occur if Contract 3B is carried out as planned is massive and most of it irreparable in any of our lifetimes. There is no mitigation that can come even close to making up for the loss of huge, old trees or for the wildlife that die due to construction impacts and loss of habitat. I can't help wondering if the roots of the trees and plants that USACE has already bulldozed as part of its Paradise Beach and Sacramento State University projects and plans to bulldoze as part of its 3B project are what has been preventing erosion and if, once they are gone, the soil that they kept in place will wash away and USACE will be the cause of the erosion it tried to prevent. .

USACE Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the 3B-south side of the American River Parkway for “potential bank erosion” protection and still more trees in other locations. 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. Some may have been based on pre-slurry wall levee conditions. To cause this kind of massive destruction based on this kind of limited, questionable data is unacceptable. I do not see adequate support for the USACE claim that destructive stream bank “erosion” control methods are needed for flood safety in this zone. The process of removing all the trees and vegetation both along the river and on the various construction roadways leading to and from the river banks will compact the soil, strip it of beneficial organisms, and likely leave it hard, dead and unable to absorb water or sustain any sort of new plantings.

Trees provide multiple ecosystem services including shade, carbon absorption, air purification and habitat for birds and small animals. As temperatures rise, what was a partially shaded river corridor will be turned into a hot, shadeless place making it hard for new vegetation to ever become established. Water temperatures will rise which will impact native fish, including chinook salmon - a species that is already struggling up and down the state. The American River Parkway is a wildlife corridor and home to multiple species, birds (migratory and non-migratory, owls, hawks and bald eagles, birds that use the cavities of old trees to nest), deer, beaver, otter, western pond turtles (which are now being considered for endangered species status) and more. The ability of wildlife to live safely and travel from one part of the Parkway to another will be badly compromised by the loss of trees and other vegetation. Riprap and rock toes will negatively impact river access as well as fish habitat. Biodiversity may be reduced. These impacts have not been adequately analyzed..

The American River Parkway is an extremely important recreation area for local residents and visitors and a beloved space where people go to enjoy nature. Currently people go there to hike, walk their dogs, bike, swim, canoe, kayak, fish, picnic and just enjoy its beauty. Lining the stream banks with riprap and rock toes will eliminate beach areas and make the river difficult for people to access. People using the Parkway will be forced to do so without any shade since all the trees will have been removed. As the climate crisis worsens, it will likely become too hot for many people to visit during the summer months and too hot for new, mitigation plantings to grow. Being in nature has psychological benefits and, if this large section of the Parkway is obliterated, people will feel a huge sense of loss. Much has been written about the psychological value of being in nature and of trees to improve people’s health and well being. Preserving the Parkway is also an environmental justice issue since many people who go there are not able to afford longer trips to other national or state parks or wilderness areas and many children would lose the joy of having access to nature.. Destruction of a significant portion of the Parkway is a loss that cannot be mitigated in any meaningful way.

Nowhere in the SEIS/SEIR did I see any discussion about consultation with local tribes about this destructive project. This project may obliterate places where tribal members go to gather plants for traditional uses and/or places that are sacred to them. Tribes should have been consulted about this project and given the right to informed consent..

Construction is projected to continue for two years (it could take longer, such projects often do) and will have many negative impacts in and of itself. The decision to use a miles-long, continuous set of launchable rock toes and trenches – and adding this type of “revetment” EVERYWHERE introduces a compounding set of significant adverse impacts. These include the need for large earthmoving equipment, massive amounts of rocks, a hundred trucks per day, causing damage to roads and levees, putting equipment staging areas in parks and beside elementary schools. All of these impacts need to be mitigated. Construction activities will lead to the loss of additional trees outside the 3B Contract area due being in the path of “access ramps” and construction supply storage areas. These trees are not shown in the draft SEIS/SEIR and so are not unaccounted for. This makes it impossible for the public to know the full loss of trees or the exact trees that would be lost. This is unacceptable. A less massive, more targeted project could have very different and less significant impacts.

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, nor has its location in relation to homes and other sensitive sites.

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)).

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 level of destruction being proposed to address possible stream bank erosion is overwhelming and impossible to mitigate adequately. I question that this level of destruction is justified or that it would even improve flood safety along this section of the American River Parkway. It is imperative that USACE acknowledge that this level of damage is unacceptable. A much MORE TARGETED and LESS DESTRUCTIVE approach that respects the Wild and Scenic Rivers designation of this portion of the American River must be found.

Based on the data and modeling available with the draft SEIS/SEIR and the incorporated 2016 General Reevaluation Report (GRR), there is insufficient evidence to justify the severe, irreparable impacts of this project. While seepage is mentioned for other reaches, it must be acknowledged 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 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 or the terrible damage that would result if this very destructive project moves forward. 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. It certainly makes me wonder whether this Project is necessary along this section of the American River. It 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.

As described previously, USACE’S approach destroys miles of intact trees and vegetation (which currently provide self-renewing natural armoring of the levees and banks), and replaces this incredible landscape with denuded, bare dirt banks and “planting benches”, for a minimum of 2 years during construction -- followed by many more years of immature, isolated plantings. This could actually make us more vulnerable to flooding, not less. The proposed approach is just as likely (or maybe more 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). Additionally, there is acknowledged concern that if high flows were to cause the installed launchable rocks toes and trenches to “launch” as designed, 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. This could leave us with an even worse situation than we have now with the denuded land at Sacramento State University and Paradise Beach and we certainly don’t want to be facing this problem at Contract areas 3B, and 4A and 4B.

E In conclusion, the SEIS/SEIR does not provide any alternative to the “significant and unavoidable” impacts that would result from its proposed handling of Contract 3B. We need and must have a MORE TARGETED and LESS DESTRUCTIVE alternative for flood protection on this portion of the American River. 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). None of this was considered for Contract 3B and should have been. Dr. Tom Bridges of USACE has written a book on working with nature entitled Engineering with Nature Atlas that might have been helpful if only whoever wrote this SEIS/SEIR had looked at it. There is growing recognition that we can’t keep damaging natural resources like the American River Parkway because the environmental cost of such damage is just too high. it is imperative that we do everything possible to protect and preserve our irreplaceable natural resources. For all these reasons, USACE needs to take Contract 3B, along with 4A and 4B, back to the drawing board, take a more targeted approach and consult with Dr. Bridges and/or others with expertise in designing projects that work with nature and proceed from there. It is too late for the Sacramento State University and Paradise Beach Contract areas. They have already been turned into sacrifice zones, but there is still time to rethink and redesign what if anything is needed to mitigate flood risks for Contract areas 3B, 4A and 4B.

Thank-you for this opportunity to comment.

Karen Jacques, Ph.D.
Sacramento City Resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:40 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Blythe Romo <blythe.romo@gmail.com>
Sent: Thursday, February 22, 2024 2:30 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

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.

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.

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.

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.

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.

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)).

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 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.

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).

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.

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.

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 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.

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.

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.

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. 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.

Blythe Romo

Woodworth, Maggie

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:29 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: American River projects 3B,4A,4B comments

EXTERNAL EMAIL

Hey Drew,

Here is a public comment.

Bailey Hunter
 Environmental Manager
 U.S. Army Corps of Engineers

From: Greta Lacin <gretal@lacin.com>
Sent: Thursday, February 22, 2024 2:02 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River projects 3B,4A,4B comments

- A** The American River Parkway and its forest and wildlife are very important to me. I live in River Park, and have witnessed what the work nearby entailed, and the significant impacts to the riverbanks here. The still barren areas stand as a reminder of what the A.C.E. means by bank protection.
- I do not believe that the environmental analysis adequately characterizes the impacts or provides adequate mitigation or considers all the reasonable alternatives to “unavoidable” impacts.
 I am writing to ask that the US A.C.E. perform a much more detailed and thorough analysis until a more targeted and less destructive approach to erosion control projects 3B and 4 is presented.
- B** California’s CEQA requires that all feasible mitigation methods be incorporated. For example, the decision to use miles long, continuous sets of launchable rock toes and trenches will result in the unaccounted for loss of additional trees, including ancient trees that are irreplaceable.
- C** Apparently the data showed no seepage risk for this stretch of the American River, especially after the slurry cutoff walls were added to the levees years ago. And when residents look at the levees at nearby River Park, denuded for years now, they are concerned that their barren state could leave them even more vulnerable to erosion that they were before the levees were stripped of vegetation. Studies exist that show that vegetation slows down river currents. The shallow benches for trees are so shallow they can never house large trees. Those levees near Sacramento State College and River Park have yet to show signs of significant revegetation, A.C.E. having missed the fall window for establishment of significant revegetation. As a result, there has been a significant and notable absence of wildlife ever since. Where did the birds, mammals, and reptiles flee to? Perhaps to the area upriver, in the proposed new project area? And once that proposed project is stripped of vegetation, where will they go?
- D** On a recent hike in the area now proposed for projects 3B, 4A and 4B, I saw countless birds, including wood ducks, two species of Towhees, at least two species of woodpeckers, numerous hawks, and many more species of songbirds. The American River has been designated “Wild and Scenic” as an “outstandingly remarkable recreation waterway,” with lush

riparian growth that includes walnut, oak, cottonwood and sycamore trees. Some of these trees are very large and very old; they are simply irreplaceable and should be treated like the treasures they are.

The Corps promises they would minimize impacts to vegetation, but stretches of vegetation near River Park were entirely removed. Some of the heritage oaks in the proposed area for the new project are believed to be 200-300 years old, older than the state of California. They will never be reestablished in the poor plant trenches proposed, and no one alive today, or generations to come, will ever see 200 year old oaks established in the proposed project area.

Sincerely,
Greta Lacin

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:28 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments American Rivers Common Features (ARCF) 2016 Draft SEIS/SEIR
Attachments: USACE_Final NPWT Letter_2.22.24.pdf

Importance: High

From: Stevens, Michelle L <stevensm@csus.edu>
Sent: Thursday, February 22, 2024 1:48 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments American Rivers Common Features (ARCF) 2016 Draft SEIS/SEIR
Importance: High

1 | Please accept our formal comments on the UEACE/SAFCA/CVPBA levee work on portions of the lower American River- Urrutia Site/ ARMS mitigation project and American River Erosion Contracts 3B, 4A and 4B draft EIR/EIS and Turtle 1 Mitigation measures for the northwestern pond turtle (NWPT) (*Actinemys marmorata*). These comments focus on the northwestern pond turtle.

Sincerely,

Dr. Michelle Stevens, Lexi von Ehrenkrook, and Emily Turner

Dr. Michelle Stevens
She, Her, Hers, Ella
Emeritus Professor, Environmental Studies Department
CSUS
Tahoe Hall 3040
stevensm@csus.edu

Bushy Lake Web Site: www.bushylake.com
EAB appt: <https://csus.campus.eab.com/pal/kbnSOHLIDb>

February 22, 2024

To: ARCF_SEIS@usace.army.mil
From: Dr. Michelle Stevens, Emeritus Professor, CSUS Environmental Studies
Department and Project Manager Bushy Lake Restoration Project, Alexandra von
Ehrenkrook, CSUS Masters Graduate Student and Senior Research Assistant Bushy
Lake Project. Emily Turner, Research Assistant
Contact: stevensm@csus.edu

Cc: PublicCommentARCF16@water.ca.gov

Bcc: AmRivTrees@gmail.com

Subject: Comments on the Draft Supplemental Environmental Impact
Statement/Subsequent Environmental Impact Report for the 2016 American River
Watershed Common Features Project, Sacramento CA

Comments Regarding American River Common Features (ARCF) 2016 Draft
Supplemental Environmental Impact Statement/Subsequent Environmental Impact
Report (SEIS/SEIR) – December 2023 Report and Appendices - Urrutia Site/ ARMS
mitigation project and American River Erosion Contracts 3B, 4A and 4B draft EIR/EIS
and Turtle 1 Mitigation measures for the northwestern pond turtle (NWPT)
(*Actinemys marmorata*).

Our comments focus on providing detailed information on the northwestern pond turtle (NWPT) (*Actinemys marmorata*) and are based on a thorough literature review and data collected at the Bushy Lake Restoration Site (BushyLake.com).

1 The American River Parkway and its woods and wildlife are extremely valuable to the public. The Bushy Lake Eco-Cultural Restoration Project (Project) has been spearheaded by Dr. Michelle Stevens since 2015, with stakeholders along the lower American River, multiple faculty members of California State University, Sacramento (CSUS) (Dr. Jamie Kneitel, Biology; Dr. Tim Davidson, Biology Department; Dr. Kevin Cornwell, Geology Department; Christine Flowers, Environmental Studies Department), and the support of hundreds of CSUS students. We are funded by the California Wildlife Conservation Board, among other sources, and have collected three years of detailed data on culturally important native plants, NWPT, birds, and mammals. Our data can be viewed on the Bushy Lake website (BushyLake.com) in our 2023 Conceptual Restoration Plan; and letters in support of listing the NWPT as a federally threatened species under the Endangered Species Act (ESA). We have been provided with the guidance and training of Jeff Alvarez, a turtle specialist, and the founder of The Wildlife Project.

We are writing with information specific to the Urrutia Site/ ARMS mitigation project and American River Erosion Contracts 3B, 4A, and 4B draft EIR/EIS and Turtle 1 Mitigation measures for the NWPT. The NWPT is petitioned for listing as federally threatened under the ESA. The final

SEIS/ SEIR should discuss and address the implications of the USFWS petition to list the NWPT as threatened under the ESA on project design, implementation, and mitigation measures, including Mitigation Measure TURTLE-1. The listing of the NWPT immediately mandates consideration of the species in federally funded projects, which may include increased regulatory requirements, increased permitting requirements, and guidelines for protocol-level surveys. The SEIS/ SEIR should include a plan for the scenario of the NWPT being listed as threatened during the project's construction period.

Based on our research and expertise, we find the information on the NWPT in your environmental documentation and Mitigation Measure TURTLE-1: Implement Measures to Protect Northwestern Pond Turtle to have errors that will need to be corrected in the final document. An addendum will be required to include the NWPT as a proposed federally listed species rather than only a California State Species of Special Concern. The sampling methodology proposed is inadequate and insufficient to detect turtles and/or turtle nests.

In this letter, we will provide information from our research on the NWPT at Bushy Lake and a thorough literature review, as well as make recommendations for conservation and management practices (BushyLake.com). Our recommendations are consistent with the Department of Defense Partners in Amphibian and Reptile Conservation (DOD PARC 2020). Our turtle research was initiated in 2020 as a component of the Bushy Lake Eco-Cultural Restoration Project which is located near Cal Expo on the lower American River in Sacramento, California (38.588839, -121.434479). Our first goal designated in the Bushy Lake Conceptual Restoration Plan is to "protect, enhance, and restore a sustainable habitat refuge for northwestern pond turtles (*Actinemys marmorata*).” A complete report of the research methods, results, and inferences of the NWPT surveys can be found on the Bushy Lake website (BushyLake.com).

Primary Recommendations for NWPT Conservation Strategies and Best Mitigation Management Practices:

- 1) Develop consistent and comparable monitoring standards for NWPT population assessments. Revise your sampling methodology in ARCF Comprehensive SEIS/SEIR Appendix B 4.3-36 to detect the presence of turtles and nesting site surveys. Use the USGS protocol, as protocol-level surveys are not yet available. We have conducted 4 years of detailed turtle surveys following USGS guidelines (2006a, 2006b) under the guidance of Jeff Alvarez, the founder of The Wildlife Project. These detailed surveys highlight the need for increased protection of the NWPT populations and their habitat. Visual surveys are highly inadequate. NWPTs are notably sensitive to human disturbance, so are not likely to be seen or identified in visual encounter surveys.
- 2) We find that catch-and-release net surveys are far more informative and accurate than visual encounter surveys. However, the catch-and-release methodology is very time-consuming. Trapping and mark-recapture studies/surveys are typically not feasible for construction projects. We recommend you assume NWPT presence if their habitat is present and recommend implementing seasonal avoidance and other measures to lessen/avoid impacts.

- 3) To identify turtles and avoid conflicts with heavy equipment, we recommend having an on-site monitor during construction activities, and seasonal closure during turtle brumation and nesting season. The biologist should be deemed “qualified” by the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.
 - a. Nesting surveys and visual basking surveys are beneficial for identifying and assessing habitat quality. We have not found basking turtle surveys to provide reliable data, except for the identification of high-quality habitat.
 - b. We offered to visit the Urrutia Site/ ARMS mitigation site to trap and identify NWPT (We have a NWPT Scientific Collecting Permit, and we have expertise and experience) to determine their presence at the site on July 15, 2023. We were told that we did not have permission to visit the Urrutia Site/ ARMS site. The Urrutia property has been purchased by the Sacramento Area Flood Control Agency (SAFCA). Neither SAFCA nor the Corps would allow us access to the Urrutia property. Therefore, there is no baseline data for NWPT presence, habitat quality, or nesting activity in any of the project areas.
- 4) Seasonal closure for construction – Injury or mortality to NWPT is likely if construction occurs during brumation as turtles are typically difficult to detect (December through March) and b) during nesting season (April through July). We also request the SEIS/ SEIR include the discussion and mitigation for pond turtle hatchlings. Hatchlings emerge from nests in February/March to traverse to standing water. At just the size of a quarter with malleable shells, hatchlings are extremely sensitive to disturbances, including falling into construction excavations, being stopped by minor and major barriers, being crushed by moving equipment, and other factors.
 - a. Note: The term “brumation” is not used in the draft SEIS/SEIR. Brumation is a winter cool-down when food is scarce, and temperatures are lower. Turtles enter into a period of sluggishness, inactivity, and torpor. They live off stored fat and their metabolism slows, making them vulnerable to construction activities. The fact that this term is not present in the document draws attention to the need for critical species-specific knowledge.
- 5) Nesting turtles move in the ecotonal area between aquatic sites and the terrestrial upland areas. The distance that turtles travel into uplands, from the aquatic refuge sites to construct nests, is highly variable and can be as far as 500 m to nest (Bushy Lake CRP WC-1943CA January 2022 Summary Report 2, Davidson and Alvarez 2020, Lovich and Meyer 2002, Holte 1998, Reese and Welsh 1997, Holland 1994, Storer 1930). Recent analysis of data from the Bushy Lake Project indicates NWPT nesting an average of 77m (253ft) from water, with a maximum distance of 154 m (505ft). To protect turtles during nesting season, we recommend season closure of construction and monitoring of 505ft from the water’s edge.
- 6) Prevent road mortality and bike strikes. We highly recommend that the project site be monitored to reduce or eliminate injury or mortality to NWPT. Collect monitoring data on the potential impacts of recreational activities on nesting turtles and consider implementing seasonal-use guidelines. At Bushy Lake, female turtles (both native and non-native turtles) exhibited indications of shell pitting consistent with turtle-bicycle

collisions. Vehicles and lawnmowers can be fatal to nesting turtles, especially if the lawnmower is not raised to at least 6 inches (Alvarez, et al. 2017).

- a. Recommended Mitigation Measures to avoid mortality due to turtle strikes include: a) Avoid construction during brumation and nesting season; b) Determine the potential for construction and/or recreational impact or other human impacts on turtles that are basking or moving through uplands; c) Place signs around roads and bike paths; d) Provide education to construction crews and public to spot turtles, support a biological monitor on site that may be able to protect turtles moving through the upland. If a NWPT is observed, a qualified biological monitor should be required to assess the situation and provide protective measures.
- 7) Nesting Surveys – Turtle nests are notoriously difficult to detect. We conducted daily nesting surveys every day during nesting season from April through July in 2022 and 2023. Most nests that trained biologists observed were predated. “Turtle nests are very hard to see. The cryptic nature of pond turtle nests makes them extremely difficult to locate, even for highly skilled biologists. Until more thorough, and consistently comparable research can be conducted, we recommend that all upland areas, irrespective of slope aspect, slope incline, soil type, vegetation type, etc., be protected if it lay within 50 m of occupied or presumed occupied aquatic habitat” (Davidson & Alvarez 2020).
- 8) Recommended Mitigation Measures for Urrutia Site/ ARMS Project and Mitigation Measure TURTLE-1 to optimize turtle basking and nesting habitat:
 - a. Provide high-quality basking habitat by adding large woody debris and artificial basking platforms in areas where there are high concentrations of turtles.
 - b. Manage accessible nesting habitat by continuing to implement managed seasonal mowing and grazing practices. Implement continued oversight to ensure that mowing equipment is set at least 6 inches above the ground to avoid adverse impact on nesting turtles (Alvarez et al. 2017).
 - c. Mowing and grazing activities at Bushy Lake have been followed by immediate use by nesting turtles, likely due to the increased accessibility for traveling and nest construction.
 - d. Remove non-native vegetation, particularly those with dense foliage or rhizomatous root systems that impede turtle movement and obstruct nest-building activities.
 - e. Plant native, fire-resilient, and culturally significant vegetation (for erosion control especially use *Carex barbarae*, *Elymus triticoides*, and *Artemisia douglasiana*). Native, fire-resilient, and culturally significant vegetation will support nesting turtles by providing a traversable habitat for nesting turtles and access for hatchlings to water.
 - f. Implement Traditional Fire Management to maintain native, fire-resilient, and culturally significant vegetation as well as support indigenous communities’ tending, gathering, and ceremonial practices. Traditional Fire Management stimulates native plants and reduces invasive species, builds the soil, and increases water holding capacity and permeability.
- 9) Emergence of Neonate Turtles: “However, observations of nests—even direct observation of nesting females, with no indication of nest-site predation at the surface—

cannot be correlated with emergence of neonate turtles. Despite indications in the field of nesting, determination of “successful” nesting of Northwestern Pond Turtles should be confined to observations of post-emergent hatchlings” (Alvarez 2018). We conclude from this work that reproductive success cannot be assumed but must be observed in the form of neonate turtles in aquatic refuge habitat.

- 10) 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.
- 11) The USACE needs to reevaluate the design choices that result in what is 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 a 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.

We have focused our attention on the analysis of impacts on NWPTs, their habitats, and information provided in the ARCF Comprehensive SEIR/SEIR Appendix B and Mitigation Measure TURTLE-1: Implement Measures to Protect Northwestern Pond Turtles. We endorse the concerns expressed by other entities including the letters submitted by the Sacramento County Department of Regional Parks, California Native Plant Society, Central Valley Bird Club, Save the American River Association, Preserve the American River, Sierra Club, and Environmental Council of Sacramento regarding the environmental process, conflicts with adopted plans, legal compliance, and impacts on other resource values, including other wildlife (especially the NWPT), vegetation communities, rare plants, general dispersed recreation, and visual quality impacts.

We also note the inconsistency with the County’s Natural Resource Management Plan Regarding the American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices - Urrutia Site/ ARMS mitigation project and American River Erosion Contracts 3B, 4A and 4B draft EIR/EIS. These projects, as described, conflict with the American River Parkway Plan Integrated Area Plan Concept for the Reaches of Discovery Park, Woodlake, and Bushy Lake (February 2006).

The ecological and cultural significance of the Urrutia Project, Woodlake, Bushy Lake, and Arden Pond is clear from the environmental assessments in combined Corps documents, and the public and agency responses to this documentation. The three lacustrine features on the lower American River provide vital habitat corridors, biodiversity, and cultural and ecological value for the lower American River.

Speaking as citizens and residents of this area, and as dedicated restoration ecologists, scientists, and ethnobotanists, the Urrutia, Woodlake, and Bushy Lake areas are deeply loved

and valued by the community, and my Bushy Lake Team which includes CSUS faculty, CSUS students, and stakeholders on the lower American River.

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https://sdmmp.com/upload/SDMMP_Repository/0/q4x2pztbkns61wv9hy30rjc78fg5dm.pdf.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:26 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

-----Original Message-----

From: Kent Lacin <kent@lacin.com>
Sent: Thursday, February 22, 2024 1:46 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

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.

I am not happy about your moving ahead with this phase of the American River Project. There must be a better way that to remove 500+ trees and put in rock and some covering dirt.

We are in danger of losing miles of important natural habitat, regenerative green canopy and psychologically essential area for the peace of mind of the people who live near the river and access it every day.

2 I ask you to open up this phase of the work you are doing to more public input. We need to come to a better understanding and appreciation for all the elements in play; nature, flood control, quality of life.

Right now, this project is being railroaded through and that is a mistake.

Sincerely,

Kent Lacin

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:24 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Laura M <laura.e.mills24@gmail.com>
Sent: Thursday, February 22, 2024 1:44 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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:

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

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

A The American River Parkway, and the waterways into which the river flows, are extremely valuable to me and have been since I was a child. I have shared the beauty and recreation of this area with my

child and grandchildren, and visitors to my city, for over 50 years. **I am dismayed that anyone would think that artificial, human-built riverbanks will be better than what Mother Nature has provided. I feel I must be the voice for the thousands of creatures who make this area their home and yet are unable to comment or attend your meetings to make their voices heard.**

I question whether this “potential bank erosion” work is necessary along this section of the American River, and have **very strong concerns** about the proposed approach of clearcut, bare banks during two years of construction, followed by years of isolated, immature plantings. This approach is just as likely to put us at risk in high water flows as is 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 insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more detailed scale than simply the overall project.

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, meticulous approach (with fewer environmental impacts) are not presented.**

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 actions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves.

Thank you.

Laura Mills

laura.e.mills24@gmail.com

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 9, 2024 2:20 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Flood Protection Work

From: Joe O'Connor <joeoconnor@earthlink.net>
Sent: Tuesday, January 9, 2024 12:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Flood Protection Work

To USACE:

As a member of the Bank Protection Working Group, I am interested in gaining adequate understanding of planned flood protection work as outlined in the recently released draft SEIS/SEIR addressing this subject. The standard 45 day review period started on 22 December, and that meant a large period took place during season holidays when people were busy with holiday activities. Additionally, the outlined work listed in this document will take place over a very large part of the American Parkway, is very complex, and has dire impact on admirable parts of the Parkway. I am sure that those interested would like the review and comment period extended beyond 5 February. For the reasons cited I would like to request that the review and comment period be extended.

I also note that the Director of Regional Parks is also requesting an extension for their purposes and similar reasons. I can understand their needs and would like to strongly support their request.

Sincerely,

Joseph O'Connor

From: [ARCF_SEIS](#)
To: [Sutton, Drew](#)
Cc: [publiccommentARCF16@water.ca.gov](#); [ARCF_SEIS](#)
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding Draft SEIS/SEIR Dated December 2023
Date: Monday, February 26, 2024 12:03:05 PM
Attachments: [Comments SEIS-SEIR Dated Dec2023.docx](#)

-----Original Message-----

From: Joe O'Connor <joeoconnor@earthlink.net>
Sent: Wednesday, February 21, 2024 1:42 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding Draft SEIS/SEIR Dated December 2023

Please see the attachment for my comments on Draft American River CommonFeatures, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV Dated December 2023

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
Email: ARCF_SEIS@usace.army.mil

21 February 2024

Mr. Josh Brown
California Department of Water Resources,
Central Valley Flood Protection Board
Email: PublicCommentARCF16@water.ca.gov

Subject: Comments on Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California
Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV
Dated December 2023

Mr. Romine and Mr. Brown:

I live a little upriver from the "Contract 3B south" area and near the Parkway and River. While recognizing that the USACE has collected a large amount of data related to flood threat in the area, the current planned flood protection measures, while enhancing flood protection, would create an environmental disaster for the Contract 3B area. The question then remains, is it all necessary? This is a major concern of people in the Sacramento area, especially of those living nearby. I would like to see something like an independent peer review to ascertain if acceptable flood protection, involving erosion control, might be gained without so much environmental damage and be acceptable to the USACE. Of course, this would require a temporary hold on proceeding with Contract 3B.

The American River Parkway is known as the Jewel of Sacramento, and it's a Federal and State Wild and Scenic River. As it exists now, it's a self-sustaining habitat for its wildlife and a great place for human recreation.

I am a member of the Bank Protection Working Group (BPWG), a group that includes the USACE, that has been working on flood protection needed along the Lower American River since 2015. Of course, the USACE has been working on that long before 2015. I have a great appreciation for all the data collected and studies that went into planning the Contract 3B plan. Thanks to a great deal of study and planning and re-planning, the foot print needed for erosion control has been greatly reduced. But plans can always be reevaluated and adjusted if necessary and possible. I believe two things are making that necessary – extensive environmental damage and public acceptance.

Now, just a few words about public acceptance – it's a big deal. As best I can ascertain, the public isn't accepting the Contract 3B measures for the American River Parkway and its river. I have been made aware of opinions from individuals and groups, and I have yet to learn of

anyone who isn't shocked and disapproving regarding the environmental damage that would result, especially of those living nearby and others who use the American River and its Parkway for recreation. All wonder if there is a better way.

Now let's briefly look at environmental and habitat damage. Contract 3B calls for the removal of 685 trees between Howe Ave. and Mayhew Drain – 149 from Site 3-1, 14 from Site 4-2, and 522 from Site 4-1, the latter between Watt Ave. and Mayhew Drain is a major concern. Sites 3-1 and 4-2 are on the north side of the river and Site 4-1 is on the south side. There would also be removal of grasses, bushes, and scrubs. Also, the launchable rock toe, placed at the river bank would extend into the near-bank river water, replacing the river grasses, more on that later.

The areas as they stands are fully functioning habitat for all manner of wildlife, ranging from insects to deer, all manner of birds and ducks and geese, and both resident and migratory fish. Migratory fish, salmon and steelhead, after hatching in the river, hang around for months or more to build size and strength. They use things such as near shore watergrass to hide from predators and find food. Places such as this are their shelter until they are ready to migrate to the Pacific Ocean. With launchable rock toe bank protection replacing watergrass, there will be some measureable fewer salmon and steelhead surviving in addition to fewer resident fish. The habitat as it exists is beneficial. The new would be much less so.

Regarding the out migration of salmon, they need cool water to survive. The existing tall trees along Site 4-2 and the east to west flow of the river means that the river would always receive some shade along that section of the river helping a little to keep the water cool. Removing 522 trees from that section reduces that benefit.

So, what might be gained from something like a pause and an independent peer review of the Contract 3B area and erosion control measures? It might be that more remaining areas are not as fragile as thought, despite having already been reduced in reach. That part of the river had some testing during the 1986 and 1997 high water events, and although that's already been considered, another examination wouldn't hurt. It might also be acceptable, at least in places, to stabilize river banks and levee faces by using "engineering with nature" methods. That is using certain plants to do the job, thereby improving the habitat. To my knowledge, the USACE has engineers with expertise that use these methods where appropriate. Also, in the past, I spoke several times with the owner of a company that specializes in using engineer-with-nature methods, and she sent me material to read and pictures of her company's successful employment of such methods along rivers. She told me there are also places in Europe, where she worked, that use these methods. There are other companies that do such work. The expertise is there, so maybe it's worth a consideration.

Then there is the pause while doing a review. To what other good use might the pause offer? One good use would be to observe the performance of the Contract 1 and 2 areas where the same methods have been employed as designed for the Contract 3B area. It might reveal where more attention is needed. Also, there are more and more Sacramento citizens belatedly learning of the large Contract 3B project who would like to comment, so extending the comment period would be in order. Then there are others who are struggling to get through and understand the large Draft SEIS/SEIR documents who would appreciate an extended comment period. And importantly, a pause would also allow time for the USACE to continue community outreach, which I believe would help with better public understanding.

For the reasons cited, I would like to see a pause and a peer review before proceeding further. All the data and studies are available. Let's see if more can be done to limit the harmful environmental and habitat impact while there is time.

Joseph O'Connor Jr.
joeoconnor@earthlink.net
Member BPWG

From: [ARCF SEIS](#)
To: [Sutton, Drew](#)
Cc: publiccommentARCF16@water.ca.gov; [ARCF SEIS](#)
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016
Date: Monday, February 26, 2024 11:05:51 AM

From: Care of the Caregiver <careofthecaregiver@proton.me>
Sent: Friday, February 23, 2024 2:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] 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):

I am writing out of concern about proposed clearing of the American
River Parkway for erosion control. My focus is on the lower American
River components of the draft SEIS/SEIR, particularly Contracts 3B, and
4A and 4B.

I head the Sacramento-based Care of the Caregiver Movement and I am a
health coach for caretakers. As such, I know firsthand how important it is for caretakers of the
sick and disabled to access places such as
the American River Parkway for a beautiful and low-cost reprieve from
caretaking duties that can be so overwhelming. Caregivers from all walks
of life and income levels turn to the American River Parkway to enjoy
wilderness-quality natural and recreational opportunities, involving
little cost or travel.

Family picnics on small points and beaches are
extremely popular in this area. The proposed methods of erosion
protection would eliminate these locations that are accessible to
disadvantaged populations. This environmental justice (EJ) impact has
not been adequately addressed in the environmental analysis.
'Riprap' measures will make river access dangerous along long stretches

of the river, and make recreation difficult, if not impossible, for miles. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain wildlife such as otters, owls, beavers, bald eagles, deer, migratory birds, cavity-nesting birds, and more, all highly valued by recreational Parkway users.

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 US Army Corp of Engineers needs to 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 more targeted and less destructive approach to Erosion Control Projects 3B and 4 is presented.

Additionally, , all heritage oaks must be retained and protected. The American River Parkway is often called the "Crown Jewel of Sacramento". 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.

Care of the Caregiver Movement
Daniela Schmidt
PO Box 1536
Sacramento, CA 95851

Sent with [Proton Mail](#) secure email.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, February 7, 2024 9:09 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: Romine, Guy K CIV USARMY CESPK (USA)
Subject: [EXT] FW: [Non-DoD Source] Contract 3B Design Documents

-----Original Message-----

From: Romine, Guy K CIV USARMY CESPK (USA) <Guy.K.Romine@usace.army.mil>
Sent: Wednesday, February 7, 2024 7:46 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: [Non-DoD Source] Contract 3B Design Documents

-----Original Message-----

From: M C <coyoteontheriver@gmail.com>
Sent: Monday, February 5, 2024 10:59 AM
To: Romine, Guy K CIV USARMY CESPK (USA) <Guy.K.Romine@usace.army.mil>
Cc: Hunter, Bailey A CIV USARMY CESPK (USA) <Bailey.Hunter@usace.army.mil>; Justin Augustine <jaugustine@biologicaldiversity.org>
Subject: [Non-DoD Source] Contract 3B Design Documents

Dear Mr. Romaine -

I am an attorney volunteering with the local non-profit American River Trees, and am emailing you to see if you could assist our group by providing us with documents that the Corps has that detail the work that is proposed in the draft SEIS/SEIR on the Lower American River, particularly with regard to Contract 3B.

Please construe this as an informal request as we are hoping the Corps will work with our group so that we can better understand the scope of the work to be done. The draft SEIS/SEIR contains very little detail about how the work is to be implemented; the most specific detail appears to be on p. 94 of draft SEIS/SEIR.

We are interested in any documentation you have that provides greater detail about the work to be done, including draft design plans, tree inventories and removal plans, plans for onsite mitigation, and the like.

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If you could provide documents as soon as possible that would be appreciated, as the deadline for comments on the SEIS/SEIR is coming soon, and we would like to better understand the proposed project before submitting our comments. We are OK with not receiving all documents at once; in fact, providing them one at a time to make any production quicker is appreciated. Since this is an informal request at this time, we're happy to work with you to narrow it down and very much appreciate you working with us on this.

I look forward to your

response. Matt Carr