From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 9:03 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: Eleanor Averitt <ladyaveritt@yahoo.com>
Sent: Friday, February 23, 2024 3:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: 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

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 Being able to take walk with my dog amongst the natural beauty of the American River Parkway is invaluable. It is a place to bond with no only my dog but also with the wildlife in the area that make the American River Parkway. Walking amongst nature is so good for my well being, both physically and mentally.

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.
Eleanor Averitt

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Erosion project on American River Parkway
Date: Monday, February 26, 2024 10:58:50 AM

-----Original Message-----
From: Beth McClure <bethmcclure1@me.com>
Sent: Friday, February 23, 2024 1:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Erosion project on American River Parkway

To whom it may concern,
The American River Parkway is a treasure of Sacramento and all of California. As a resident of Sacramento County for over 30 years I have spent 1-3 hours per day on the horse trail and along the bike trail to exercise, enjoy nature and appreciate our wild spaces.
The devastation that occurred over the last 2 years with the last “erosion” project was an abject failure in the disruption to our beloved trail and its plants, trees and animals and to the people who depend on the trail to enhance their lives and the lives of their families and community members. With global warming and climate change it is imperative to keep mature tree canopies and to remove literally every living thing was unbelievably short sighted. These impacted areas will not recover certainly in my lifetime but not even that of my children. The natural habitat has prevented erosion with interlocking root systems and co dependency since rivers first flowed. You have spent millions on levee support and that should be enough and the focus. One needs only to stand on the Sac State bridge and looks at what looks like a war zone in a desert and see the tremendous erosion happening with these most recent storms….please look at the silt from your construction site pouring and clouding our beautiful river.
The most powerful image of all that your projects have destroyed was the large graffiti under Howe Avenue THE DAY THE TRAIL REOPENED! In 30 years we have never had graffiti along the parkway in Arden Arcade….this happened because the tagged recognized this barren landscape devoid of green as not worthy of keeping pristine and of no value any longer….
Please keep our trees for our future.
Sincerely yours,
Elizabeth McClure MD
Sierra Oaks Vista resident
Sacramento County

1

Sent from my iPhone

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Contract 3B Site Project
Date: Monday, February 26, 2024 11:00:57 AM

From: Robert L'Heureux <lheureux1@hotmail.com>
Sent: Friday, February 23, 2024 2:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Contract 3B Site Project

Greetings,

Thank you for extending the comment period for the subject project.

1 I'm a homeowner in the vicinity of the project scope. (That is, I live in the College Glen neighborhood and the street I live on abuts the levee that is scheduled to be addressed by this project.) My concerns are mostly for the trees and wildlife that abut the American River. I would request that the Army Corps consider the many who live and recreate along the American River by proceeding with a more measured approach that doesn't completely scar the riparian area behind our homes as has already been done along Sacramento State. We would be in support of a project that more methodically institutes tree removal and replanting rather than removing all trees along the River as well as the wildlife that depends on them.

2 Please consider my comments return with a more neighborhood friendly and—more directly—*environmentally* friendly plan that doesn't include the removal of the flora and fauna for those here now and for the and several generations to come.

Sincere Regards,

Robert L'Heureux, PE

Comments of Dennis Eckhart on the Draft SEIR/SEIS, particularly Contracts 3B, and 4A and 4B.

My connection to, and knowledge of, the American River Parkway

Since moving to Carmichael in 1983, I have visited the American River Parkway thousands of times. From 1991 to 2010, I commuted virtually every day by bicycle to and from downtown Sacramento on the Jedediah Smith Multi-use Trail. After transitioning to a part-time work schedule, I continued to commute to downtown Sacramento several days a week.

I usually visit the parkway several times a every week for birdwatching, wildlife viewing/photography, and hiking, and for volunteer restoration activities for the American River Parkway Foundation (ARPF) and the American River Natural History Association (ARNHA).

From August 2011 to the present, I have volunteered with the ARPF's Invasive Plant Management Program (IPMP), concentrating primarily on removing red sesbania (Sesbania punicea), Spanish broom (Sparftum junceum), stinkwort (Ditirichia graveolens) and yellow starthistle (Centurea solsftftalis), but also removing French broom (Genista monspessulana), Scotch broom (Cyftsus scoparius), giant reed (Arundo donax), milk thistle (Silybum marianum), and Italian thistle (Carduus pycnocephalus). During my 13+ years in the IPMP, I have surveyed and pulled invasive plants on both the left and right banks of the lower American River on most of the 23-mile parkway. 1

In 2016 I was asked to join the ARPF's Program Committee, a position I hold to this day. In 2021 I was asked to represent the ARPF at Sacramento Area Weed Management Meetings, which I continue to do. Also, at ARPF's request, I reviewed and provided written comments on two drafts of the Natural Resources Management Plan and the Monitoring Plan (Appendix D) for the Parkway.

My capstone project for certification as a California Naturalist in 2017 involved the organization of a stinkwort eradication project at the north end of the Nature Study Area (NSA) that is adjacent to the Effie Yeaw Nature Center (EYNC) in Ancil Hoffman Park. Stinkwort eradication at that site is ongoing. In 2023 volunteers under my direction pulled over 18,426 stinkwort plants at that location.

In 2020 I joined the Habitat Restoration Team (HRT) at EYNC, where I lead the Invasive Plant group on monthly workdays, survey the NSA for invasive plants, and plan eradication efforts. In 2023 HRT volunteers removed 1,110 Spanish broom, 9842 yellow starthistle, 2600 Italian thistle, and 3743 rush skeletonweed (Chondrilla juncea) in the NSA.

Although my post-graduate degrees are in Philosophy and Law, I have attended seminars and conferences on invasive-plant biology and control methods. I have provided trainings and prepared written materials on invasive plants for both ARPF and ARNHA.

Comments on Draft ARCFS SEIR/SEIS

While I am greatly concerned about the destruction of wildlife habitat and natural space, including the loss of hundreds of heritage trees and other native flora along the banks of the American River, my comments on the draft SEIR/SEIS will be confined to deficiencies in relation to invasive plant species, and in particular, the total lack of identified methods and procedures to prevent the introduction and spread of invasive plant species, including pernicious annuals, such stinkwort and yellow starthistle. 2

Several legal and policy directives require USACE to identify action to prevent the introduction and spread of invasive species

The draft SEIR/SEIS cites and describes Executive Order EO 13112, signed February 3, 1989, as

> *. . . direct[ing] Federal agencies to take actions to prevent the introduction of invasive species, provide for control of invasive species, and minimize the economic, ecological, and human health impacts that invasive species cause. . . .* ***This EO requires consideration of invasive species in NEPA analyses, including their identification and distribution, their potential effects, and measures to prevent or eradicate them.***

This brief passage in the Draft SEIR/SESS ends with the conclusionary assertion that

> The Proposed Action complies with EO 13112 by discussing invasive species and measures to prevent their spread during construction in Appendix B Section 4.1 Vegetation and Wildlife.

(Draft SEIR/SEIS, sec. 6.1.12, pp. 6-7; italics added.)
Despite this assertion, Appendix B does not "discuss[ ] invasive species and measure to prevent their spread during construction."
Appendix B does cite and again briefly describes Executive Order EO 13112 (although it incorrectly says this EO was issued in 1999, rather than in 1989):

2 cont'd

> [EO 13112] directs Federal agencies to take actions to p*revent the introduction of invasive species, provide for control of invasive species, and minimize the economic, ecological, and human health impacts that invasive species cause*. EO 13112 also calls for the restoration of native plants and tree species.

(App. B, 4.1-19 -20, Italics added.)
Appendix B also cites Executive Order 13751, issued December 5, 2016, but states only that this EO "directs action to continue coordinated Federal prevention and control efforts of invasive species." (Ibid.)
EO 13751 states in the strongest possible terms the policy of the United States in regard to invasive species:

> ***It is the policy of the United States to prevent the introduction, establishment, and spread of invasive species***, as well as to eradicate and control populations of invasive species that are established. Invasive species pose threats to prosperity, security, and quality of life. They have negative impacts on the environment and natural resources, agriculture and food production systems, water resources, human, animal, and plant health, infrastructure, the economy, energy, cultural resources, and military readiness. *Every year, invasive species cost the United States billions of dollars in economic losses and other damages*.

(EO 13751, sec. 1, italics added.)

Further, EO 13751 amends section 2 of EO 13112 to state:

> "Sec. 2. Federal Agency Duties. ***(a) Each Federal agency for which that agency's actions may affect the introduction, establishment, or spread of invasive species shall, to the extent practicable and permitted by law, (1) identify such agency actions;*** (2) subject to the availability of appropriations, and within administrative, budgetary, and jurisdictional limits, use relevant

> agency programs and authorities to: ***(i) prevent the introduction, establishment, and spread of invasive species;***
> . . .
> (c) conduct research on invasive species and ***develop and apply technologies to prevent their introduction, and provide for environmentally sound methods of eradication and control of invasive species;***

2 cont'd

(EO 13751, sec. 3, italics added.)
As pertinent to this discussion, EO 13751 also amended EO 13112 to define the key terms "introduction" and "prevention," as used in the "Federal Agency Duties" section, quoted above:

> (d) 'Introduction' means, as a result of human activity, the intentional or unintentional escape, release, dissemination, or placement of an organism into an ecosystem to which it is not native.
> . . .
> (h) 'Prevention' means the action of stopping invasive species from being introduced or spreading into a new ecosystem.

(Id., sec. 2.)

Also cited in Appendix B is USACE's Invasive Species Policy, issued in February 2023, which

> Requires that ***civil works projects will include measures to either prevent or reduce the establishment of invasive and non-native species.*** O&M will include strategies for invasive species management.

(App. B, 4.1-19 -20; italics added.)

More specifically, USACE's policy provides, in pertinent part, that

> 6. ***Measures to either prevent or reduce establishment of invasive and non-native species will be a component of all USACE Civil Works projects and will be applied to invasive species issues in the execution of all Civil Works programs.*** The intent is to integrate the Invasive Species Policy into all projects and programs to effectively and efficiently manage invasive and nonnative species, including harmful algal blooms.
>
> a. Operating projects will include strategies for invasive species management in their project Operation and Maintenance (O&M) responsibilities and ensure these strategies are addressed in Master Plans and Operational Management Plans (OMPs) as appropriate. These strategies will be coordinated, as required by law, with other Federal agencies, Tribal Nations, State and local governments, non-government organizations, stakeholders, and partners, as applicable.
> b. Civil Works planning documents will appropriately address invasive species concerns in their analysis of project impacts. native plants and tree species. . . .
> c. Construction activities creates (sic) the opportunity for the introduction, spread, and establishment of invasive species. ***Engineering and Construction shall consider and implement practices to reduce the introduction and spread of invasive species during the design and construction of Civil Works projects.***

(USACE Invasive Species Policy, sec. 6, italics added.)

The Draft SEIR/SEIS addresses invasive plant species in summary and incomplete fashion

On page 4.1-17, the document briefly paraphrases section 3.6 of the ARCF GRR FEIS/EIR in regard to the types of areas where invasive species typically occur, e.g., "previous construction sites." The draft SEIR/SEIS then quotes from page 113 of the ARCF GRR FEIS/EIR:

> These invasive species typically outcompete native plant species and must be controlled aggressively including mitigation and restoration areas. Since 2001, Sacramento County and SAFCA have collaborated on invasive plant management planning efforts, which have guided local efforts towards eradication of all populations of giant reed (Arundo donax), tamarisk (Tamarix spp.), French broom (Genista monspessulana), Scotch broom (Cytisus scoparius), Pampas grass (Cortaderia selloana), red sesbania (Sesbania punicea), Chinese tallow tree (Triadica sebifera), oleander (Nerium oleander), and pyracantha (Pyracantha spp.).

3

Significantly absent from this list are Spanish broom (Spartium junceum)–an invasive species considerably more prevalent on the Parkway than Scotch or French broom. Nor is either stinkwort (Dittrichia graveolens) or yellow starthistle (Centurea solstitialis) listed, despite extensive infestations on the Parkway.

Moreover, ARPF has mapped only two tamarisk on the entire Parkway and only a handful of orleander and pyracantha. Giant reed and Pampas grass do occur on the Parkway, but only in small patches which ARPF monitors and removes as volunteer resources are available.

The Draft SEIR/SEIS does not address measures to prevent the introduction of invasive species during construction

Not only does the Draft SEIR/SEIS fail to even mention several of the most invasive and widespread invasive plant species on the Parkway, but, despite the clear mandates and policy directives, described above, the draft SEIR/SEIS does not even mention, let alone describe, any practices or procedures to prevent or reduce the introduction of invasive species during any phase of the project. Nor does the draft SEIR/SEIS provide for pre-construction surveys to determine what invasive species may already be present at the site.

4

Of particular concern are Invasive species, such as stinkwort and yellow starthistle–both annuals in the Asteraceae family—produce hundreds of seeds in the summer and fall. Both these weeds are prevalent along highways and trails because they take hold and thrive in disturbed ground. Grading and other construction activities are common vectors.

As noted above, I have considerable experience with the stinkwort Infestation in the NSA at Ancil Hoffman Park. Stinkwort produces a pungent odor, and contact with the plant causes dermatitis in some people. No native animals consume stinkwort, and there are as yet no biological controls available.

In the fall of 2017, thousands of mature stinkwort–many of them three feet tall and three feet around–created a monoculture in several acres of open cobble at the north end of the NSA. Over the next two years, volunteers pulled and bagged mature stinkwort prior to seed production. Nonetheless, new infestations have continued to emerge at the site, which has required constant effort to maintain control.

Comments of Dennis Eckhart on the Draft SEIR/SEIS, particularly Contracts 3B, and 4A and 4B.

In late summer and fall 2021 a project of the Sacramento Water Forum to create habitat for fall-run Chinook Salmon was completed in this same part of the NSA. One component of the project involved substantial grading and creation of a side channel where salmonids could safely mature before migrating to the Pacific Ocean. Construction coincided with the peak period for stinkwort flowering and seed production, but construction activities at the site precluded stinkwort control and eradication that year.

4 cont'd

In the year following the project, volunteers removed 15,885 stinkwort plants from the site. In 2023 even more plants, 18,426, were pulled and bagged.

It is important to note that the Water Forum project did not include the importation of any soil, rocks or other materials from off-site. Construction equipment, which included dump trucks, bulldozers and a loader, were thoroughly cleaned before entering the site, and they remained on site for the duration of the project. Even with these measures, stinkwort continues to thrive at the site.

In contrast, USACE's proposed project along the American River would involve hundreds of vehicle trips entering and exiting the site at a number of access points. Considerable materials (rocks, soil, and erosion controls such as wattles) will be imported from off-site. Yet the draft SEIR/SEIS does not address these vectors for introduction of invasive plants, such as stinkwort, onto the Parkway. Not addressed in any way shape or form are such issues as the cleaning of trucks, bulldozers and other vehicles before they enter the site. Nor is there any mention of whether soil and rocks will be obtained from weed-free sources.

These deficiencies should be addressed in the Draft SEIR/SEIS, and procedures to prevent the

introduction of invasive plant species should be adopted and adhered to in this project.

Thank you for considering my comments on the Draft SEIR/SEIS.

Dennis Eckhart

Feb. 23, 2024

From:	ARCF_SEIS
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
Date:	Monday, February 26, 2024 11:02:52 AM

From: Clint Duke <clintduke87@gmail.com>
Sent: Friday, February 23, 2024 2:09 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

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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.

Clint Duke

From:	ARCF_SEIS
To:	Sutton, Drew
Cc:	publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject:	[EXT] FW: 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
Date:	Monday, February 26, 2024 11:03:31 AM

From: john dye <john@dye-design.us>
Sent: Friday, February 23, 2024 2:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] RE: 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.

A I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. The Corp does many good projects in the West but this is not one of them. I've paddled the Lower American River for over 30 years in water levels ranging from 1,200 cfs to over 20,000 cfs. I've never seen conditions which would warrant removing the trees and vegetation which holds the bank together. The Corp's approach to taking a natural riparian riverbank, denuding it of all life and turning it into an engineered ditch is out dated, un-needed and a waste of tax payer dollars.

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

- Proposed project appears it will result in increased flow during flood events. If so this would increase bank erosion rather than reduce erosion.
- Increased flow rates during flood events may simply raise the flood danger for communities downstream.

C

- Reassess the value of the existing riparian habitat in the EIR.
- Preserve existing riparian habitat at all cost.
- Spend the dollars on stream restoration as opposed to stream destruction.
- Concentrate on expanding flood plains, backwaters and marshlands to absorb flood waters and improve salmon spawning habitat in the watershed as opposed to riprap and habitat destruction.

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,

John Dye
Co-Founder Rivers for Change

U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, CA 95814

Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, CA 95821

Submitted via email: ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

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

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

1

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contract 3B, and the complete lack of an appropriate and site-specific environmental analysis for a project of this magnitude. The section of river between Howe Avenue and Mayhew Drain is different from any other section of the river previously worked on by the U.S. Army Corps of Engineers, so one would expect a unique approach when considering providing "potential erosion protection". And, as far as I can see in the SEIS/SEIR, Contract 3B has not been given an appropriate and in-depth environmental analysis, or the benefit of a unique approach. I feel as though USACE are employing a one-size-fits-all approach to the sites within Contract 3B, which will cause irreparable damage to this section of the Wild and Scenic lower American River, and the many species that call this region "home". Instead of proving that erosion protection is necessary through sound science, USACE are using oversimplified modeling, and scare tactics to justify the need for potential erosion protection in the area between Howe Avenue and the Mayhew drain. This lack of a detailed and site-specific analysis, coupled with the proposed approach of clearcutting mature forests (including heritage oaks), obliterating miles of shady riverine aquatic habitat (SRA), and filling with rip rap, leads me to believe that the community will likely see a much higher risk of erosion after Contract 3B is complete.

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Among my many concerns with Contract 3B are the proposed use of rip rap and the loss of shady riverine aquatic habitat, which are in complete contrast with the National and State Wild and Scenic Rivers Act, as well as recommendations by the Central Valley Flood Protection Plan Conservation Strategy, and the American River Parkway Plan.

Rip rapped banks will cut off river access for many American River Parkway recreational users. If "Bank Protection" allows for sharp/angular rip rap to be placed at the water's edge, continuing at any length up the riverbank, this will stifle *primitive river access* for fishing, boating, wading, nature-viewing, etc. Figure 3.5.2-9 from the 2016 SEIS, displays "bank

protection/riverbank protection" for nearly the entirety of Larchmont Community Park, only stopping on the west end of the park, where rip rapped banks already cut off user access.(A) Cutting off access to these long-used primitive river access points will be in direct violation of American River Parkway Plan Goal/Policy 8.16.(B) This section of the American River Parkway adjacent to Larchmont Community Park is an extremely popular water access point, with several social trails leading down to the river. The American River Parkway Plan even lists 3 official pedestrian levee access points in the area between Sara Park and the east end of Larchmont Community Park.(C) The beaches in this section of the river are currently made from various sized smooth river stones, which make wading, swimming, fishing, and small boat launching much safer than the alternative. If we lose the beaches in this section, and the current river stones and pebbles are replaced with sharp/angular rip rap, all of these recreational opportunities will be lost with them. Section ES-5 of the ARCF SEIS/SEIR Executive Summary considers the long-term recreational loss in Project 3B South "No impact", which can't be further from the truth. In USACE written responses to official comment letters to the 2016 GRR EIS/EIR, USACE claimed that "once construction is complete and mitigation plantings have been established, access to the water's edge in the construction footprint will be permitted."(D) But, if bank protection itself limits user access to the water's edge, then Project 3B will permanently remove primitive river access for recreational users. Furthermore, if high flow events remove the loose soil that is installed over top of large sections of rip rap, as the SEIS/SEIR proposes, then these inaccessible sections of exposed rip rap will only grow larger over time.

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A. ARCF Comprehensive SEIS/SEIR and Appendix B (Detailed Analyses), 2016, Figure 3.5.2-9, 3-36.
B. American River Parkway Plan, 2008. Goals and Policies, Public Access and Trails, 8.16, pg 126 - *"A variety of primitive and developed fishing access points shall continue to be maintained."* https://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-092617_sm.pdf
C. American River Parkway Plan, 2008. Area Plans - Sara Park, pg 174.
D. ARCF GRR Final EIS/EIR Appendix F, May 2016. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/ARCF_GRR_Final-EIS-EIR_AppF_May2016.pdf

Removing a canopy of over 500 trees, and installing unnecessary rip rap revetement, as proposed in American River Erosion Contract 3B South, will lead to a substantial loss of shade and habitat diversity, which could lower the survival rate of various species of salmonids (Steelhead and Chinook Salmon). Although the proposed 3B South plan does involve mitigation efforts to replant some trees, you simply cannot mitigate for the mature canopies that exist between Watt Avenue and Larchmont Community Park. Removing the kind of mature trees that are thriving in the proposed construction footprint could have devastating effects on fish populations and sport-fishing alike. In a study published by the US Department of Agriculture and the US Forest Service, scientists found that "stream temperatures are far more sensitive to changes in shade than to changes in either air temperature or stream discharge."(A) Because water temperature is known to have drastic effects on salmonid's ability to migrate for spawning, and the survivability of their eggs/fry, a project like USACE'S 3B will put unnecessary

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stress on fish. In a report prepared for the National Oceanic and Atmospheric Association (NOAA), it was determined that “Studies of the migration timing and survival of adult Chinook support the notion that high water temperatures can limit migration success,” and that “Temperature ranges above optimal may cause fish to cease migration.”(B) If one of the goals is fostering a healthy fishery and ensuring the success and survival of species of interest, like the Chinook Salmon, then the logging and removal of acres of mature shade-providing trees along the riverbank would be the exact opposite of what is needed. Goal/Policy 3.11 of the American River Parkway plan states: "Agencies managing the Parkway shall identify, enhance and protect: areas where maintaining riparian vegetation will benefit the aquatic and terrestrial resources; current shaded riverine aquatic habitat."(C) In addition to the stress introduced by the potential loss of canopy, the installation of huge quantities of rip rap, where the riparian and shady riverine aquatic zones currently thrive, will only further stress these sensitive fish populations. A study presented by the Habitat and Enhancement Branch of Fisheries and Oceans-Canada recognized that "riprap reduced habitat complexity and diversity, important to survival, growth, migration, and reproduction of salmonids," and that "Negative effects of rip-rapped streambanks can include a loss of riparian vegetation, resulting in a loss of nutrients and food sources, decreased future LWD (large woody debris) recruitment, and reduced shade, and a decrease in habitat diversity."(D) This complete obliteration of the riparian corridor and elimination of the shady riverine aquatic habitat is also in direct contrast with the Central Valley Flood Protection Plan Conservation Strategy from 2016, where the CVFPP recommended the “establishment of continuous corridors of riparian vegetation and Shady Riverine Aquatic cover” to facilitate the recovery of various native species. (E) It seems as though the USACE ARCF SEIS/SEIR plans to complete these “erosion” projects in direct contrast with recommendations/policies of both the American River Parkway Plan, as well as the Central Valley Flood Protection Plan Conservation Strategy, with little justification.

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A. “*Shading Out Climate Change: Planting Streamside Forests to Keep Salmon Cool*”, Science Findings, June, 2020. “Steve Wondzell, a research ecologist with the USDA Forest Service’s Pacific Northwest Research Station, conducted a study on the upper Middle Fork of eastern Oregon’s John Day River. By using computer modeling, he and colleagues found that adding shade was the single most effective way to cool the water and preserve habitat for salmon into the future. With enough added shade, they found that future water temperature in the river could be cooler than today, even as air temperatures warm.” https://www.fs.usda.gov/pnw/sciencef/scifi228.pdf
B. “*The Influence of In-stream Habitat Characteristics on Chinook Salmon (Oncorhynchus tshawytscha)*”, David Bergendorf, November 2002. https://www.webapps.nwfsc.noaa.gov/assets/11/7389_10232012_174142_Bergendorf2002.pdf
C. American River Parkway Plan, 2008. Goals and Policies, Aquatic Community Policies, 3.8, 3.11, pg 18
D. "*Streambank Protection with Rip-rap: An Evaluation of the Effects on Fish and Fish Habitat*", J.T. Quigley and D.J. Harper, 2004 https://waves-vagues.dfo-mpo.gc.ca/library-bibliotheque/285541.pdf
E. Central Valley Flood Protection Plan, Conservation Strategy, November 2016. Section 5-27. https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Flood-Management/Flood-

Planning-and-Studies/Central-Valley-Flood-Protection-Plan/Files/CVFPP-Updates/Files/2016-CVFPP-Conservation-Strategy_ay11.pdf

12 Please take the time to perform a more site-specific environmental analysis for Contract 3B, and if more accurate modeling and site-specific data show that erosion is occurring in a way that affects levee stability, then treat those specific areas in a more surgical manner that compliments and enhances the natural environment. The American River is an incredibly unique resource, but it is not an infinite one. The surrounding community and the millions of Parkway visitors who walk these trails and paddle these waters each year do not want to look back one day and think of what USACE could have done differently.

Sincerely,

Clint Duke

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment on proposed Contract 3B project
Date: Monday, February 26, 2024 11:04:28 AM

From: Peter Hathaway <phath2@comcast.net>
Sent: Friday, February 23, 2024 2:16 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment on proposed Contract 3B project

To Decision-makers for the Contract 3B project to harden levees on the American River through suburban Sacramento:

1 I instinctively question projects like this, which would strip off mature riparian vegetation to armor-plate levees with heavy rock. At the same time, I appreciate the co-objective of flood control along an urban river. A corridor of riparian vegetation within levees offers a superior natural solution for flood control. That kind of corridor exists as the starting point here along the American River downstream from Watt Avenue.

2 I know about the Los Angeles River Riparian Restoration project, which in the next few years will remove a 60-80 year old massive concrete channel in favor of levees with a riparian vegetation corridor. It is a Corps of Engineers project backed by at least 8 years of studies. Yes, it is a different project, different situation, different details, but seeks the same broad objective of superior flood control plus ancillary public and natural benefits through an urban flood plain. If anything, the area along the L.A. River is more intensely built up, and the flood danger more acute because the upstream mountains are so steep and so close, and climate change looms as an important factor in both places. I think the work the Corps of Engineers along with local and state agencies did in L.A. may provide useful insights that could inform decisions to be made for the Contract 3B project here. **I ask that you review carefully the studies and decision deliberations that led to the Los Angeles River Riparian Restoration project to see if the same information and conclusions might be applicable here for the Contract 3B project, and allow for less disturbance to the existing American River riparian corridor.**

4 I live a few minutes walk from the American River, about 10 miles upstream from Watt

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Avenue, and actively use the American River Parkway several times each month. I am currently retired, but my 41-year career in transportation centered on funding and decision-making for large, complex, multi-objective projects, so I can understand the challenges and choices for this flood control project. My value system suggests that greater weight be given to natural and riparian features for this Contract 3B project rather than hardscape engineering features, and that this weighting would more closely match nearby community and political values.

Thank you for the comment opportunity.

Peter Hathaway

From:	ARCF_SEIS
To:	Sutton, Drew
Cc:	publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject:	[EXT] FW: [Non-DoD Source] TIME SENSITIVE: Please Help Ensure a Better USACE Proposal for American River 3B Project
Date:	Monday, February 26, 2024 11:05:11 AM

From: LESLIE WATTS <leslie.watts@prodigy.net>
Sent: Friday, February 23, 2024 2:20 PM
To: Jonah.Knapp@CVFlood.ca.gov; Chris.Lief@CVFlood.ca.gov
Cc: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; richdesmond@saccounty.gov; Matthew.Ceccato@mail.house.gov; Susan_Rosebrough@nps.gov; BellasE@saccounty.net
Subject: [Non-DoD Source] TIME SENSITIVE: Please Help Ensure a Better USACE Proposal for American River 3B Project

Dear President Dolan and Members of the Board and Staff:

I appreciate the dedication of 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 Avenue.

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.

I respectfully request that your Board:

Conduct 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 beyond Feb. 23, 2024, to ensure the above occurs;

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 USACE 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. My neighborhood community strongly questions 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. 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 canoe access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial 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.

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 USACE 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 USACE 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 as 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 for your consideration of these concerns.
Leslie A. Watts

From:	ARCF_SEIS
To:	Sutton, Drew
Cc:	publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject:	[EXT] FW: [Non-DoD Source] Comments Regarding ARCF 2016 Draft SEIS/SEIR, December 2023 Report and Appendices
Date:	Monday, February 26, 2024 11:06:58 AM

From: Pamela Hatton <pamelahattonito@icloud.com>
Sent: Friday, February 23, 2024 2:21 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding ARCF 2016 Draft 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. **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 thousands of other people, in the greater Sacramento area and beyond. It is also home to thousands of creatures, large and small, including birds, squirrels, opossums, raccoons, rabbits, skunks, foxes, coyotes, and deer.

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, 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,** and the analysis of alternatives for a much more detailed, cautious, surgical approach — with less environmental impacts — are not presented.

My specific concerns and comments include the following:

B 1. The near-total devastation, both during construction activities and long after, while immature vegetation struggles to re-populate the bull-dozed levy sides.

C

2. The project's long-term impacts on near-by residents: months of air pollution from the soil components distributed through the air by the broad-range bull-dozer approach; months of noise pollution from the same broad-range bull-dozer approach; months of limited or no parkway access for those of us within walking distance, who regularly use the area for exercise, walking pets, and social interactions.

D

3. The danger of mudslides and just general surface/soil erosion and deterioration, that will happen while trees and other plant life, and their stabilizing root systems, attempt to repopulate. It will take ***YEARS*** for the area to recover, and the left-over damage will present hazards to humans and animals alike.

E

4. And, the undisputed ugliness, of our once beautiful river parkway will harm us all, mentally, if not physically.

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.

And, yes, this is a "form letter," but, as indicated by my modifications, I have read it. ***AND I AGREE WITH THE ISSUES IT ADDRESSES.***

Thank you,

Pamela Hatton

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Contract 3B site project
Date: Monday, February 26, 2024 11:07:44 AM

From: Judy Thompson <judyfred815@gmail.com>
Sent: Friday, February 23, 2024 2:33 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Contract 3B site project

1 I am writing to oppose the above project that will destroy our beautiful trees that clean our air and
2 also block a lot of noise from freeway traffic. Where is the wildlife supposed to go? This is the third project I will have to live with in 10 years since my back fence faces the College-Glen river access.
3 Noise and dust for two years and having to keep windows closed in summer to avoid keeping dust out of the lungs of my 83 year old husband who has copd will be a real challenge.

Judith D Thompson

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 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices
Date:	Monday, February 26, 2024 11:11:15 AM

From: Ellen Ganz <ganz.ellen@gmail.com>
Sent: Friday, February 23, 2024 2:34 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:

1 I am writing to request a less destructive and more targeted approach for Contract 3B. The 3B area is not at risk for flooding or erosion of the levee. The 2017 Lower American River Streambank Monitoring Report for the American River Flood Control District found that erosion at this side does not threaten the levee due to the width of the berm. This project puts us at more risk for flooding by removing the root system that holds the levee in place, and inserting rock that will inevitably shift and need to be maintained. Significant erosion has now been seen at the Contract 1 and 2 sites and should be considered in planning for the 3B, 4A and 4B areas.

2

3 William Polk said on the news that this is being done to shore up the levees, not that the levee is at any risk of failure. The levee is so far away from the river that any erosion wouldn't come close to damaging it. It is not clear to the residents that we need this work for flood protection. What is clear and what we do know is that the project as proposed will cause REAL and KNOWN HARM to our children. I am terrified of the impacts that this will have on the very young children in the neighborhood who are at even greater risk from dust

4

and fumes. These levels of fumes and dust put them at known risk of cancer, asthma and more health impacts. Please take into consideration that O. W. Erlewine is a Title 1 school that is entitled to greater protection.

5 When making the final plans, I am pleading that mitigation efforts be made to reduce the dust, noise and smog such as re-routing trucks away from the elementary school, using smaller equipment, electric equipment, and anything else that can be done.

6 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 residents are asking for a more detailed plan created with local scientists and experts that includes mitigation efforts.

7 **We need more detailed information including the number of trucks that will be by our house a day, what kinds of fumes will be released and how much dust will be in the air. Will these be measured and provided to residents? We need to know if and when there will be varying levels of hazard so that we can make the best choices for our health. Will this be communicated and how?**

8 I have an eight-year-old little boy who means the world to me. He attends O.W. Erlewine Elementary School and we visit the park and the river throughout the year. I always imagined him coming back here as an adult with fond memories. If work is needed, please reduce risk and build back the area in a way that allows for recreation on the river. I am asking you to please treat this area as you would protect your own families and children- protect us from flooding while safeguarding the open space that we love and protect our children from dust and dangerous fumes.

Thank you for your time and consideration,

Ellen Ganz

Subject: 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.

My Experience on the American River Parkway

The American River Parkway is extremely valuable to me.

I have lived near the Mayhew Drain for 33 years and have spent much time on the river canoeing, rafting, swimming and playing with my dog. It has been among my greatest pleasure to be able to walk into the clear water and cool off on a Summer day; to watch the Magpies twittering over what twigs are needed in their nest; to see my dog swim and swim for the pure joy of it.

1 I dread the days when the tandem trucks, with their polluting emissions and heavy loads will deliver the rocks designed for erosion prevention and be lain in such a way as to rid the young fish from their natural habitat. I will miss seeing the deer, the coyotes, the hare, the birds, the otters, the beavers, the many waterfowl. We have been lucky to live so near this excellent slice of paradise. As a friend of mine from LA said: *We have to drive 75 miles to see something like this, and pay another $50 to walk it.* It's hard to be beat the trails along the American River for walking, running or bird/nature watching.

The USACE will now step in and "make this SAFER" by laying rock, evening the ridges of the river bank, and its edges. Making the river not accessible for recreational activities or for the simple things of cooling off in the shade of a tree, or by placing your feet in the water.

2

How do we account for this loss of Nature? How do we know if the disregard for its many attributes will be worth it if we see the nearby USACE renovated banks erode within months of its completion (referencing the recently completed Campus Commons area)?

The "new construction" does not address the ongoing erosion caused by rain, or the on-going problems with the drainage system backing up. As a USACE engineer remarked while examining a levee (in a USACE
3 video), it is good to see the grass grow on the levee slopes, to help prevent erosion. There will be no growth on that newly manmade slope for some time. When you realize these mistakes happen, will the USACE be here to maintain and or fix this?

With the newly graded slope, with no vegetation for some time – will the water rush downriver, and thereby
4 protect our community? What happens to the downstream urban community, and the rural communities past the urban center?

I would rather the Corps cancel the entire slope reconstruction and concentrate on those areas that need protection. Or save the money for this area and store on an emergency flood control plan that can be applied in the time of need. I wish for the people that come to this place after me also enjoy the land and natural surroundings as much as I have. 5

COST BENEFIT ANALYSIS:

Because the loss is so huge and the gain is so unpredictable (only a flood will tell - - the results are unproven and expensive), I wanted to look at a cost benefit analysis.

There is no Cost:Benefit Analysis, but people realize that there is a great immediate and irreparable loss in natural resources.

6

How to account for loss in natural resources? The United Nations is addressing this issue in it's, "System of Environmental – Economic Accounting (SEEA) 2012" Applications & Extensions, New York 2017." Lectures from the UN also include economic reasoning that if we do not account for natural resource loss, we will not treasure them, and we need to realize what damage we do when creating a system or new things. In this way, we have a Gross Domestic Product (GDP) that is more realistic.

"If we start to understand the value of nature to our society and economy, we wil recogniz=se the importance of living in harmony with nature, rather than destroying it for the short term gain. So many governments and businesses around the world are now realizing this, and starting to act – it gives me real hope for the future." Chief Advisor, Economics and Development WWF-UK (https://www.wwf.org.uk/what-we-do/valuing-nature#

Cost = total loss of ecosystem for this area

Loss of Fish Habitat: the lower American River is known for its anadromous fish (one of the Outstandingly Remarkable Values in its designation of being a Wild and Scenic Reiver) to include salmon, steelhead, striped bass, and American shad. Limited warmwater fishery for largemouth black bass, various sunfish, and catfish, together with a few trout and striped bass, supports a summer fishery. The lower American River is fishable year-round (rivers.gov/river/American). 7

Loss of Wildlife and aquatic animals (not specifically quantified)

- To include: coyotes, deer, possum, raccoons, hare, squirrels
- Muskrat, beavers, otters,

Loss of over 500 trees – includes:

- Loss in Air Quality
- Loss of Carbon Capture (Loss in in fighting Climate Change)
- Loss of Natural vegetative erosion prevention (roots)
- Loss of shade canopy
- Loss of noise barrier

- Loss of nesting habitat
- Loss of shelter
- Heritage Oaks
    - Unique nesting features for mergansers and wood ducks
    - Cannot replace – large rooting (erosion prevention) system & Carbon sequestering loss

Loss of River Access & Recreation Activities

7 cont'd

This short stretch of river, flowing through the city of Sacramento, is the most heavily used recreation river in California. It provides an urban greenway for trail and boating activities and is also known for its runs of steelhead trout and salmon. (rivers.gov)

- Swimming, wading
- Launching small craft
- Fishing
- Hiking
- Picnicking

Loss of a variety of birds (150 species in area – due to loss of habita

- Lack nesting, food, shelter
- No longer an area for migrating birds

Adverse Noise

Adverse Vibration to nearby real property

Loss of Air Quality – diesel and carbon emissions (Alternative fuels/ lower emission vehicles were not considered in alternatives)

Loss of Accessibility on land and in water – Not mentioned as a loss, but projected to be able to return to the river in 10 years (Sacramento USACE Public Affairs Officer, Feb 2024)

Cost of Project: To Be Determine

Cost of Mitigation: To be determined

Cost of Maintenance: To Be Determined

Benefit = added value if we have a particular kind of flood from increased water flow and it is shown to be better than the barriers to such an event compared to what is already in place.

8

Possible, unproven, help in preventing floods

Clear view of the lower banks of the river

8 cont'd

Sunbathing bank for rattlesnakes

Many, many non-indigenous rocks; rocks forever in this river bed

According to Cal. Code Regs. Title 14, Section 15003 – Policies (b) the EIR serves not only to protect the environment but also to demonstrate to the public that it is being protected.

9 I see no proof of protection, just proof of destruction. We are not being protected. This is an operation being forced on us that we are convinced that the Corps could do so much better if it considered Engineering with Nature. There is no nature-based solution considered in the many alternatives listed.

10 I am also convinced that this document fails to inform the public generally of the environmental impact of a proposed project (see Section 15003 (c). Mitigations mentioned do not address the loss of the immediate area. Environment is more than air and water quality assessments. Construction scheduling also needs to recognize breeding season of the wildlife in this area.

11 I strongly suggest that the USACE retool their program and preserve more Nature so that we do not incur this unmitigable loss of natural environment

DIFFICULT DOCUMENT REVIEW

12 As a member of the public, I think you need to be through this process of reading, understanding, researching and commenting at least one time to understand the process. This is hugely encumbering, difficult to follow, and unnecessarily confusing document…although there are various Codes of Federal Regulations requiring a more understandable document, and the Corps insists it performs a lot of public out reach.

13 The 45-day review is a minimum review period, and the Corps could easily extend it (Cal. Code Regs. Title 14, section 15105(a)). The 940 page document, along with the 840 page Appendix has a total of 1780 pages and encompassed 8 separate projects. I am interested in a few projects, but the information for these were dispersed throughout the document. A 45-day period would mean 40 pages would need to be analyzed each day, and upon extension, a 60-day period would average a 30 page analysis to be done each day.

(Title 40 CFR, Section 1502.7) The text of final environmental impact statements …shall be 150 pages or fewer and, for proposals of unusual scope or complexity, shall be 300 pages or fewer unless a senior agency official of the lead agency approves in writing a statement to exceed 300 pages and establishes a new page limit. (This length of document averages 7 pages a day to review…)

(Cal. Code Regs. Title 14, Section 15003) Policies (g)) states, "The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind." This criteria is not met in this SEIS/SEIR.

(Title 40 CFR Section 1502.8) states that, "Agencies shall write environmental impact statements in plain language and may use appropriate graphics so that decision makers and the public can readily understand such statements.

Excerpt from 3-29 ARC Comprehensive SEIS/SEIR:

This table outlines and defines the erosion protection terms for erosion protection activities on the American River.

"Launchable toe with planting bench – Placed as the waterward face of a planting bench.

14 Launchable toe – placed along the riverbank near the riverbank toe.

When at riverbank toe, can be included with or without a planting bench.

Tie-back features are typically incorporated element with erosion features listed above as necessary to meet flood risk measures.

Planting Bench Rock Tie Backs – Placed within planting benches and spaced intermittently

There is not much effort or intent in this document for new or inventive alternatives, especially when it did not consider any of the nature-based solutions.

I noted that some ideas contained in the document to be used in preventing erosion are complicated and basically rely on rocks and rock replacement. One of the elements used in the construction plan is the

15 launchable rock trench. This is introduced in the American River Common Features GRR Erosion Protection Report, section 6.3. The report states the "rock trench design concept" comes from the Windrow trenching method of erosion protection widely used along the Mississippi and Missouri Rivers; however, it is not used in the area of the Wild and Scenic River portion of the Missouri River, according to the National Park Service.

16 **(Title 40 CFR Section 1502.1 (g)) states, "Environmental impact statements shall serve as a means of assessing the environmental impact of proposed agency actions rather than justifying decisions already made."**

I would recommend that the Corps review less invasive designs when they are more appropriate for a more comparative portion for the lower American River.

Public Engagement:

The Army Corps of Engineers has not engaged with the Public via meetings or workshops to explain the various methods of bank protection measures that they expect to install. It is up to the public to figure out

17 such terms as, "launchable rock toes, tiebacks, launchable rock trenches, and riprap armoring. The USACE told us when we requested a meeting to discuss these terms, he said that there would be presentations offered in January that will explain the details. The presentations did not explain these terms, nor did they allow any questions. They promised to record our comments. That meant that we could not get simple questions answered to better understand the document. Recently, in a US **Army Corps of Engineer presentation, the presenting Colonel stated that they are, "engineering with nature," and dedicated to" communicate, communicate and communicate as soon as possible."**

On their website, an Update for August 11, 2023, stated, "We will hold two virtual public meetings, one on Wednesday, January 10, 2024, and one on Tuesday, January 16, 2024 to present this document. And that is all they did, was present the document and record comments (not answer any questions). At the original

18 Scoping meeting held November, 2022, the instructions included (pg 4), #3 Comments will inform the

preparation of the SEIS/SEIRwill not be responded to verbally during this meeting. Comments will only be accepted in writing via e-mail or regular mail.

19 Chapter 4 of the Appendix A states "Future Public Involvement, "USACE also plans on opportunities for public awareness, involvement, and participation including website updates and formal and informal meetings with interested members of the public, community groups, and individuals as requested. We asked for a meeting multiple times including during the Corps two presentations, and were not able to get one.

I made phone calls that were frequently answered by "sorry this number is not available." When I left a message, it was often not returned.

One letter written attached to the Draft Environment Impact Statement EIR and Draft GRR stated that the best outcome will occur if the USAE works with stakeholder groups at the local level. Agreed. Another letter written by our Assembly member encourage the Corps to work with two local agencies.

More Nature-Based Solutions:

20 In November 2022 the letter submitted by the US Environmental Protection Agency noted that the Alternatives Analysis offered by the Corps did not explore and objectively consider "various bank and levee protection designs that could be employed to maximize environmental benefits or ecological components, structures and functions while also reducing risk and property loss from a large flood event."

I concur with most things addressed in this letter, and especially with the suggestion that more environmental aware solutions exist. In this way, the Corps is remiss in not at least mentioning the alternative nature-based solution discovered by their own Engineering with Nature Program.

21 In a comment on the Draft EIS-EIR and Draft GRR (March 2015) an Environmental Scientist, Division of Water Quality stated, "In general, we encourage the Corps and the CVFPB to implement alternatives which conserve to the greatest extent the existing riparian vegetation, especially large mature trees that would not likely pose a threat to the integrity of the levee banks.

22 Executive Order 14072 takes multiple actions designed to tackle the climate crisis, make our nation more resilient to extreme weather, and strengthen local economies, including focusing considerable attention and federal effort on nature-based solutions. There is a video to learn more about the executive order and the role USACE will play in enacting it. (https://ewn.erdc.dren.mil/ewn-supports-white-house-in-accounting-for-nature/)

23 **This idea is further emboldened by the Title 40 – Protection of Environment, Section 1507.2 (e) Comply with the requirements of section 102(2)(H) of NEPA that the agency initiate and utilize ecological information in the planning and development of resource-oriented projects. Further, in 1507.3 © (4) Requiring that the alternatives considered by the decision maker are encompassed by the range of alternatives discussed in the relevant environmental documents and that the decision maker consider the alternatives described in the environmental documents. If another decision document accompanies the relevant environmental documents to the decision maker, agencies are encouraged to make available to the public before the decision is made any part of that document that relates to the comparison of alternatives.**

Climate Change:

Although this is implied in the need for flood control in general, Climate Change is not addressed. The river bank stabilization effort can be equally challenged by drought and/or flood. However, this plan does not address drought conditions, and if there is a multi-year drought I would expect this design to increase the impact of heat and loss of vegetation. Certainly, carbon capture will not occur without trees and other mature vegetation. Temperature, both cold and hot, would be more extreme. 24

> **In the President's November 8, 2022 address to the climate Change Conference (COP 27), it was stated that Nature-based solutions are actions to protect, sustainably manage, or restore natural or modified ecosystems as solutions to societal challenges, like fighting climate change. Examples include protection or conservation of natural areas, reforestation, restoration of marshes or other habitats, or sustainable management of farms, fisheries, or forests. These actions can increase resilience to threats like flooding and extreme heat, and can slow climate change by capturing and storing carbon dioxide. Nature-based solutions play a critical role in the economy, national security, human health, equity, and the fight against climate change.**

Erosion construction:

The design of this erosion prevention construction does nothing to mitigate erosion destruction caused by rain or rills of water that may result from heavy storms, common during Sacramento Winter months. In fact the recent (Winter 2023-24) Army Corps construction of the banks near Campus Commons shows astounding amount of erosion shortly after construction. Yet the nearby banks, unaffected by the Corps construction, fared far better. 25

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.

The Alternatives in the section for hauling equipment is not adequately considered. Big, tandem diesel-fueled trucks and other large similar hauling equipment are the only ones that can be used. There are alternative designs and fuels/energy sources available; but these are not considered in the report. These trucks are limited in their movability – necessitating trimming/cutting multiple trees in their path. Perhaps this is the size preferred for hauling rocks, but not the best environmental choices for a variety of reason. 26

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, 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 applicable, tailored approach (with less environmental impacts) are not presented.

Recommendation: 27

I know that this project is planned to go forward regardless of the adequacy of this review or "comment period." (Also inferred by the project television news coverage, KCRA News Segment aired 2/22/2024).

I also feel that "one size fits all" model was used in these plans. (This is especially true as I read what seemed as a disingenuous promotion of the use of a launchable rock trench as a feature (see 6.3 of the Erosion Protection Report of the American River Common Features GRR.) I believe the local citizens are not represented in this effort; in fact most people we met during our outreach of the past three months had no idea that this project was scheduled to take place. While we are tasked to review 1780 pages for adequacy and accuracy of alternative solutions, the Corps is not accessible to answer questions or to meet with the local community.

28

Code of Federal Regulations, Section 1502.1 states one of the purposes of the EIS is to ensure agencies consider the environmental impacts of their actions in decision making. It adds that, "a means of assessing the environmental impact of proposed agency actions, rather than justifying decisions already made." I feel that the SEIS/SEIR coupled with Corps communications really is to justify decisions already made.

29

The US Army Corps of Engineers, in pursuing this "one size fits all" project is missing a great opportunity to promoting natural resources while providing a gentle footprint to lower-cost, more natural solutions, This community, like so many others, wants to continue to enjoy nature's bounty while ensuring safe and healthier lifestyles for everyone. We believe the Corps has the interest and knowledge to provide nature-based solutions to engineering problems, to include the best approach to various extreme weather tragedies that happen with our rapid climate change. We all want to be part of the solution for this future and not cause any harm to life, environment or our many gifts of nature.

30

This means retooling our solutions through creative problem solving; applying engineering knowledge in ways that fit every unique environmental problems they face.

Now, it seems the Corps is bent on involving massive amounts of rocks, using polluting vehicles resulting in hard armor construction of the river that limits its movements. It is thereby missing a great opportunity…to move into a position of known climate change heroes for all populations it affects through engineering with nature and helping mitigate disastrous events.

31

The Corps should be able to propose a more nature-based project, work with the tools and expertise of their Engineering with Nature program. During this process they should have information readily available with multiple outreach programs for local stakeholders and interest groups. This would result in unique and progressive projects that can be endorsed by a wider population and promote the health of the local community, the earth and result in a healthier environment that is more able to survive the many events that will result from climate change. They should dedicate their role as a promoter of natural solutions, while increasing natural resources and supporting the local populations and their environment.

This effort along with intent to work with local stakeholders, can result in a more cooperative project that preserves and promotes the benefits of nature while protecting the population from emergencies from the flooding river, rain or drainage issues.

32

The US Army Corps of Engineers needs to engage with the Public, and not continue a one-way communication which does not increase knowledge of the projects nor increase confidence in the plan

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. We are destroying the reasons it has been delegated a Wild and Scenic River.

Nancy Kniskern

From:	ARCF_SEIS
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
Date:	Monday, February 26, 2024 11:17:44 AM

From: Jeff Hamann <mnh2obuff67@outlook.com>
Sent: Friday, February 23, 2024 2:45 PM
To: PublicCommentARCF16@water.ca.gov; 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

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 walk the banks of the river daily, collecting trash and soaking in the natural habitat.
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.

B My specific concerns and comments include the following: the lost of habitat and access to this special area to hikers, runners, fishermen, recreational seekers. Recreational opportunities for our youth in the lose of soccer fields for staging areas. All the issues created by the heavy equipment destroying our living environment.

C More information on the need for this massive. What will be the impact on all the wildlife in the targeted area.

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.

Jeff Hamann

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Removal of hundreds of trees along the American River
Date: Monday, February 26, 2024 12:17:27 PM

From: Gretchen Fau <fau@pacbell.net>
Sent: Friday, February 23, 2024 3:27 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Removal of hundreds of trees along the American River

1 I would like to state my protest in regards to the plan to remove such a huge amount of trees (many of which are old growth trees) along the American River in Sacramento. The area will look like Ground Zero for generations. The American River Parkway is a resource that many people in the area utilize and of course trees offer relief from our hot summers and help with pollution.

There must be a better way.

Gretchen Fau

From: ARCF_SEIS
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment on ARCF SEIS/SEIR 2023
Date: Monday, February 26, 2024 12:16:46 PM

From: Nancy Kniskern <knancy2020@gmail.com>
Sent: Friday, February 23, 2024 3:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment on ARCF SEIS/SEIR 2023

More Nature-Based Solutions, *PLEASE*

1 In November 2022 the letter submitted by the US Environmental Protection Agency noted that the Alternatives Analysis offered by the Corps did not explore and objectively consider "various bank and levee protection designs that could be employed to maximize environmental benefits or ecological components, structures and functions while also reducing risk and property loss from a large flood event."

I concur with most things addressed in this letter, and especially with the suggestion that more environmental aware solutions exist. In this way, the Corps is remiss in not at least mentioning the alternative nature-based solution discovered by their own Engineering with Nature Program.

2 In a comment on the Draft EIS-EIR and Draft GRR (March 2015) an Environmental Scientist, Division of Water Quality stated, "In general, we encourage the Corps and the CVFPB to implement alternatives which conserve to the greatest extent the existing riparian vegetation, especially large mature trees that would not likely pose a threat to the integrity of the levee banks.

3 Executive Order 14072 takes multiple actions designed to tackle the climate crisis, make our nation more resilient to extreme weather, and strengthen local economies, including focusing considerable attention and federal effort on nature-based solutions. There is a video to learn more about the executive order and the role USACE will play in enacting it. (https://ewn.erdc.dren.mil/ewn-supports-white-house-in-accounting-for-nature/)

4 **This idea is further emboldened by the Title 40 – Protection of Environment, Section 1507.2 (e) Comply with the requirements of section 102(2)(H) of NEPA that the agency initiate and utilize ecological information in the planning and development of resource-oriented projects.**

4 cont'd

Further, in 1507.3 © (4) Requiring that the alternatives considered by the decision maker are encompassed by the range of alternatives discussed in the relevant environmental documents and that the decision maker consider the alternatives described in the environmental documents. If another decision document accompanies the relevant environmental documents to the decision maker, agencies are encouraged to make available to the public before the decision is made any part of that document that relates to the comparison of alternatives.

Nancy Kniskern

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

My comments primarily focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. However, as an Environmental Scientist with a hydrogeological background, whose worked for DFW in the Instream Flow Program and currently working for the CA SWRCB Surface Water Ambient Monitoring Program (combined 13 years employment), **I am concerned with the overall approach of these types of projects—this one and future projects.**

1

❖ ***My Community***

I wanted to begin by offering **my appreciation for your time in reviewing my community's many very important comments.** Having discussed the details of this proposal with so many, I can feel their hearts breaking at the thought of this project (implemented as-is) taking place. In addition to our love for this precious, protected Wild & Scenic area, I wanted to let you know that **most of my community involved in this effort have also become well educated on the elements of the project—both good and bad.**

2

Our community includes people from all walks of life and backgrounds coming together for this cause, **including engineers and scientists (like myself) who possess in-depth knowledge on the subject matter. However, I do not believe it takes a scientific background to recognize the areas of this project that are unquestionably in need of improvement, postponement, and/or reassessment.**

I ASK YOU KINDLY TO PLEASE ALLOW ALL OUR VOICES TO BE HEARD. THANK YOU.

❖ ***We Share a Common Goal!***

We all want healthy waterways that safely convey water! Let's make sure we're using the best methods available that **both alleviate erosion issues AND best utilize the built-in, natural erosion control benefits that the many trees and riparian vegetation already offer.** "Restoration" (over many years) will not sufficiently reestablish the healthy habitat that had already been stabilizing the banks for hundreds of years, prior to human interference of natural flow characteristics. **Projects that address fixes/improvements to upstream causes of unnatural flow, such as dams, should always be prioritized over destructive, downstream methods, such as this project proposes.**

3

PLEASE POSTPONE THE PROJECT AND REEVALUATE THE EROSION-CONTROL BENEFITS OF PRESERVING EVEN MORE TREES THAN CURRENTLY PLANNED.

❖ ***Nature-based Solutions***

I understand and appreciate that USACE's project was designed to "spare as much habitat as possible", however, **I don't believe that the project (as it currently stands) preserves all that is possible to preserve.** I have researched several alternative "nature-based", less destructive

4

4 cont'd methods that could assuredly be implemented here and elsewhere on the American River but are being disregarded.

Please review the attached document, *SACRAMENTO RIVER BANK PROTECTION PROJECT PHASE II SUPPLEMENTAL AUTHORIZATION, EIS/EIR, VOLUME II: COMMENTS AND RESPONSES TO COMMENTS (March 2020)*, as evidence of **several alternative methods that were recommended by various agencies/organizations/governmental departments to USACE as a result of numerous environmental impact concerns identified in a similar project proposal.** 5

I'd like to point out one of these responses from the CA SWRCB, for which I'm employed and fully back their below statements (page 2-50 of attached document):

> *"State Water Board staff has reviewed the Draft EIS/EIR to determine if the proposed project will have significant adverse impacts to water quality and, ultimately, the beneficial use of waters of the state. We recognize the great importance of flood protection for the communities and farms of the Sacramento River valley. We understand the enormous economic risk and the risk to human life that exists without a safe, functional levee system.* ***However, significant ecological impacts are possible as a result of the proposed project.***
>
> *In general,* ***we encourage the Corps and the CVFPB to implement alternatives which conserve to the greatest extent the existing riparian vegetation, especially large mature trees. Alternatives that maximize meander zones should be selected.*** *Setback levees should be used when feasible. State Water Board staff has prepared the attached comments on the Draft EIS/EIR (see Enclosure 1, Table 1)."*

To reiterate, **I understand that USACE believes their project already avoids unnecessary deforestation, however, I disagree given their selected method among a plethora of alternative techniques and approaches that would not only better preserve the environment, but also add to the potential overall success of the project's effort to address erosion issues.** 6

PLEASE POSTPONE THE PROJECT AND CONSIDER ALTERNATIVE, NATURE-BASED, LESS DESTRUCTIVE APPROACHES, SUCH AS THOSE ALREADY RECOMMENDED TO USACE.

❖ ***Public Notification Insufficiencies***

Although USACE may have abided by outdated and minimal public notification requirements, **I'm incredibly disappointed with the lack of public informing that a project—with this significant of an impact on the local environment, residential communities, and businesses, such as this one—has involved.** USACE is not required to publicly inform only at the minimal requirement. It would be fair to assume that **a trustworthy, guilt-free, good-willed agency, confident of their chosen method would want to sufficiently inform, even involve, the communities that would be directly and indirectly affected.** 7

Instead, our community worked tirelessly to inform **hundreds of residents, businesses, and Parkway users who were NOT INFORMED OF THE PROJECT IN ANY RESPECT.** This is unacceptable. So many, including myself, were appalled by the project proposal and felt deceived

by USACE at the lack of public notice and involvement. I don't want to accuse USACE of being "sneaky", but unfortunately, this is the only impression I've received from their actions, or lack thereof, regarding this project thus far.

PLEASE CONSIDER BETTER INFORMING AND INVOLVING COMMUNITIES AND BUSSINESSES IMPACTED BY USACE PROJECTS.

❖ ***California Waterways Unique to the County***

California waterways are UNIQUE, SENSITIVE, AND UNCOMPARABLE to most other waterways throughout the country. The American River does not, for example, function primarily as a conveyance system for commercial boat transportation, and possesses a wide spectrum of differing characteristics, and as such, requires specifically tailored, and equally unique treatments to achieve the best results. 8

Any USACE projects executed elsewhere, such as on the Missouri or Mississippi Rivers, should undergo massive adaptation, involving extensive targeted research of California's unique waterway uses and needs (including California species protection), before being applied in California rivers. The currently proposed project requires even more adaptation and targeted assessment.

I do not believe this project (as-is) sufficiently encapsulates all the many special components that would be required to effectively mitigate erosion issues without inadvertently inflicting other, equally serious issues (such as the loss of vital species and large-scale, natural erosion control provided by riparian vegetation). 9

PLEASE POSTPONE THE PROJECT AND PERFORM MORE TAILORED RESEARCH.

PLEASE WORK WITH MORE CALIFORNIA RESOURCE ENTITIES TO INCORPORATE RELEVENT AND LESS DESTRUCTIVE SOLUTIONS.

❖ ***Wild and Scenic Protected***

The Lower American River is fully protected under the Wild and Scenic Act, which classifies it as a water system that **"possess extraordinary scenic, recreational, fishery, or wildlife values [that] shall be preserved in their free-flowing state, together with their immediate environments,** for the benefit and enjoyment of the people of the state." —*California Wild and Scenic Rivers Act, 1972.*

National Wild and Scenic River System | Rivers.gov describes the American River's unparalleled recreational importance as it exists in its current state, *"This short stretch of river, flowing through the city of Sacramento, **is the most heavily used recreation river in California**. It provides an urban greenway for trail and boating activities and is also known for its runs of steelhead trout and salmon."* 10

The methods proposed by USACE's project (as-is) DO NOT COMPLY with the protections granted under the Wild and Scenic Act. **This project would significantly and negatively impact the river's "free-flowing state, together with [its] immediate environment".**

Furthermore, Section 6.3 of the *USACE Erosion Protection Report of the American River Common Features GRR Report* states, "The rock trench design concept (depicted below in Figure 6-1) comes from the Windrow trenching method of erosion protection widely used along the Mississippi and Missouri Rivers". This was referenced as if it represented what USACE has implemented in both the Wild and Scenic portion of the Missouri River, and the long, navigable sections in need of their continued monitoring and structural maintenance. However, **USACE DOES NOT IMPLEMENT THEIR "LAUNCHABLE ROCK TRENCH" METHOD IN THE WILD AND SCENIC PROTECTED PORTION OF THE MISSOURI RIVER, which is more characteristically comparable to the lower American River.** 11

How was it then justified as a viable method to be used in the Wild and Scenic portion of the American River? USACE had already set a precedent for non-use of this method in Wild and Scenic portions but are unjustifiably applying it here. This is a very consequential inconsistency that must be further investigated.

PLEASE POSTPONE THE PROJECT AND REEVALUATE METHODS THAT SIGNIFICANTLY REDUCE IMPACTS TO PROTECTED ELEMENTS OF THIS WILD AND SCENIC AREA.

PLEASE BE FAIR AND CONSISTENT IN COMPLYING WITH THE WILD AND SCENIC ACT.

❖ *Other Urgent Concerns*

Again, I appreciate your time and understand there are many lengthy comments to review, but I'd like to ask for your continued attention as I outline **the equally serious concerns** I have with the proposed project and the draft SEIS/SEIR environmental analysis.

➢ Erosion is actually minimal in USACE's Contract 3B 12

- Advanced, modern modeling more accurately predicts low water velocities at the levees.
- Modeling recently conducted on other segments of the lower American River demonstrate the protective effect of trees when included in the models.
- While seepage is mentioned for other reaches, the data presented for Contract 3B show no seepage risk for this zone and there is inadequate evidence for urgent erosion issues.
- **PLEASE POSTPONE THE PROJECT AND USE MORE MODERN, UP-TO-DATE MODELS TO MORE ACCURATLY DETERMINE THE DEGREE OF EROSION FIXES NECESSARY.**

➢ Upcoming Folsom Dam Improvements Not Considered 13

- According to the USACE website, "*The U.S. Army Corps of Engineers Sacramento District is moving forward with the Folsom Dam Raise Project to help further reduce flood risk in the Greater Sacramento area. The Dam Raise Project has prioritized completion of the*

remaining flood risk reduction elements of the overall project, which include raising the existing crest elevation of Dikes 1 through 8, MIAD, LWD, and RWD by approximately 3.5 feet. ***This work is expected to enhance utilization of Folsom Lake's existing surcharge flood storage space and increase the temporary water storage space that can be used during flood events****."–*https://www.spk.usace.army.mil/Missions/Civil-Works/Folsom-Dam-Raise/

14 • The project modeling was designed under the premise of 160,000cfs releases from the current, pre-improved Folsom Dam. When the dam improvements are in place, the maximum release **will significantly decrease to 115,000cfs**.

15 • According to the USACE website, preparation and construction for the *Folsom Dam Raise Project* have already begun and is scheduled for completion in 2027.

16 • Improvements and resulting changes in flow volumes, especially "during flood events", must be incorporated into USACE project models to effectively evaluate the degree of erosion fixes necessary

17 • **PLEASE POSTPONE THE PROJECT UNTIL FLOW-ALTERING FOLSOM DAM IMPROVEMNTS ARE COMPLETED**
• **USE MODELING THAT ENCORPORATES THE SOON-TO-BE LOWER FLOW VOLUME.**

➢ Riprapped Riverbanks Present Significant Negative Consequences

18 • Significant Impacts to American River Recreational Beneficial Uses: The proposed installment of riprap will make river access, and very popular recreational activities (e.g., swimming, fishing, birdwatching, watercraft deployment, etc.), difficult and potentially dangerous, if not completely impossible, for miles of the project area.

19 • The SEIS/SEIR fails to recognize, let alone mitigate for, the impacts to most recreational features, except the bike trail.

20 • Non-compliance with Wild and Scenic Act: The riprap revetment element of this project would significantly and negatively impact the river's "*free-flowing state, together with [its] immediate environment*", a protection offered by the Act.

21 • **PLEASE POSTPONE THE PROJECT TO EVALUATE METHODS THAT PRIORITIZE THE PRESEVATION OF RECREATIONAL BENEIFIAL USES.**
• **PLEASE POSTPONE THE PROJECT TO EVALUATE USING NATURE-BASED SOLUTIONS TO COMBAT EROSION.**

➢ Significant Impacts on Wildlife and Critical Habitats

22 • Riprap hinders natural riverbank vegetation growth, and stifles tree growth.

23 • Major loss of habitat for many important species. **The biodiversity of this ecosystem is complex and interconnected and is heavily used by wildlife**.

24 • Major loss of 200+ old "heritage" trees, precious to this area's human and creature inhabitants alike.

25 • Clear-cutting disrupts the nesting, mating, and feeding habits of local and migratory bird populations.

26 • Substantial loss of shade from the mature canopies along the river's edge may lower the survival rate of various species of salmonids.

27 • The petition for listing the western pond turtle imposes additional requirements on the environmental analysis and mitigation.

28 • High levels of noise and vibrations will disturb natural animal behaviors such as nesting, spawning and feeding activities.

• **PLEASE POSTPONE THE PROJECT TO EVALUATE USING NATURE-BASED SOLUTIONS THAT ARE MORE PROTECTIVE OF INVALUABLE WILDLIFE AND CRITICAL HABITATS.**

➢ **Significant Impacts to Mental Health and Green Spaces**

• Trees and vegetation are important elements of green spaces, which have been scientifically linked to improved mental health, stress level reduction, enhanced mood, and increased feelings of well-being. The removal of trees proposed by this project will lead to great loss of these beneficial green environments.

29 • According to the California Department of Public Health, "*As communities become increasingly more urban, parks and the protection of green and open spaces within cities increase in importance. Parks and natural areas buffer pollutants and contribute to the quality of life by providing communities with social and psychological benefits such as leisure, play, sports, and contact with nature. **Parks are critical to human health by providing spaces for health and wellness activities***." https://data.chhs.ca.gov/dataset/park-beach-open-space-or-coastline-access

• The U.S. Department of Health and Human Services states that the lack of green space is one of the most important causes of childhood obesity, and the need for green places to protect children's health is becoming more recognized and apparent.

• **PLEASE POSTPONE THE PROJECT TO CONSIDER METHODS THAT AVOID SERIOUS IMPACTS TO GREEN SPACES AND HUMAN HEALTH.**

➢ **Significant Air Quality Impacts on Human Health**

30 • As the proposed USACE project currently stands, each construction site would have an estimated 100+ daily truck trips that travel through residential communities over the span of 2+ years. USACE claims less than significant impacts of air pollution on sensitive receptors. **However, the OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months** (OEHHA, page 8-18). https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

31 • 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. Transportation of 100+ truckloads of such rocks per day, and the associated dust, within a quarter mile of a school has not been addressed in the SEIS/SEIR.

32 • **PLEASE POSTPONE THE PROJECT AND PREPARE A CONSTRUCTION HEALTH RISK ASSESSMENT (HRA) TO PROVIDE SUBSTANTIAL EVIDENCE THAT THE PROJECT**

33

WOULD NOT EXPOSE RESIDENCES TO DIESEL PM EMISSIONS, NOR ASBESTOS CONTAMINATION, AT LEVELS RESULTING IN SIGNIFICANT HUMAN HEALTH IMPACTS.

➢ Significant Impacts to Environmental Justice

- The American River Parkway sees more than 5 million visitors annually, which is more than Yosemite! Both locals and travelers from far and wide come to enjoy the one-of-a-kind "Crown Jewel of Sacramento".
- It provides wilderness-quality natural and recreational opportunities, involving little to no cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics and events on small points and beaches are extremely popular in this area.
- **PLEASE POSTPONE THE PROJECT TO CONSIDER METHODS THAT AVOID SERIOUS IMPACTS TO ENVIRONMENTAL JUSTICE RIGHTS.**

34

➢ ***My Personal Connection and Final Pleas***

The American River's Wild and Scenic river designation was based on "recreation" and "anadromous fish", wherein the definition of "recreation" includes intrinsic values that include a person's enjoyment and value of nature and wildlife and woods in all forms.

For this reason, I wanted to briefly share with you my personal connection to this one-of-a-kind, precious area with the hope that you'll hear my heart as the last item of evidence among the many extremely important and valid points I've presented in this letter, requesting the postponement and reevaluation of the destructive and unnecessary elements of this proposed project.

I moved over a year ago to, and still reside in, an apartment complex adjacent to the proposed USACE Contract 3B project portion of the American River. My father had just passed unexpectedly, and I'd just escaped an emotionally abusive husband of ten years. However, this is not a sob-story because I now have the mental stability and quality of life that I'd been seeking my entire existence.

I owe this to the Parkway. To the heritage trees whose souls connect to mine, and whose branches on which the happy, fat squirrels chase each other about; and whose trunks so generously house the busy, little woodpeckers and so many others. To the wise Great Blue Herons and the snow-white Great Egrets who so stealthily fish at the water's edge. To the turkey vultures that take to the skies and glide about the breeze with ease and majesty.

I owe this to the salmonids whom I love to watch wiggle up the shallow riffles with shear tenacity; and to the sea lions who occasionally follow them up in higher flows. To the many wonderful, good-willed, nature-loving people I've met along the Parkway. To the irreplaceable summer raft-floating adventures with friends and loved ones. To the peace and love that emanates from every piece of this Wild and Scenic area, so rightfully designated.

Please allow my voice, and those of my community's, to be heard and taken seriously. I'm not asking USACE to stop providing erosion fixes, where necessary, or discontinue projects altogether. I'm simply asking that they postpone and reevaluate their proposed project to better address and

incorporate all the many valid points I've presented in this letter, and those of my community's letters as well.

35 Please support my request for re-evaluation of the overall necessity for this proposed project taking place in this beautiful Wild and Scenic protected area. Please evaluate and seriously consider alternative methods and solutions that are more targeted, less destructive, more ecosystem-conscious and wildlife-protective, that also utilize the natural erosion protection benefits that the existing trees and riparian vegetation already provide; and those that are less negatively impactful to human health, mental health, recreation, and all those who currently thrive and depend on this one-of-kind, easy-to-access and easy-to-appreciate area.

Please heed our requests and desperate pleas.

Thank you for your time. You are appreciated!

Candice Heinz

Environmental Scientist

INDIV-717

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

John OConnor <johnrusselloconnor@gmail.com>

Thu 2/22/2024 12:27 PM

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

Some people who received this message don't often get email from johnrusselloconnor@gmail.com. Learn why this is important

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: Brown, Josh@DWR
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Common Features public comment
Date: Thursday, February 22, 2024 2:31:16 PM

-----Original Message-----
From: Mechele Palmer <mechpalmer@icloud.com>
Sent: Thursday, February 22, 2024 11:08 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Common Features public comment

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Please keep tree removal to a minimum along the American river during flood protection work. It's important to the whole community that a natural place be protected now and into the future.

Sent from my iPad

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

Mary Swisher <maryeswisher@gmail.com>

Thu 2/22/2024 1:00 PM

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

[Some people who received this message don't often get email from maryeswisher@gmail.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.

INDIV-720

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

Linda <lindabkingsley@comcast.net>
Thu 2/22/2024 12:52 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 lindabkingsley@comcast.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Thank you.
Linda Kingsley

Sent from my iPhone

From: Zilan Chen
To: Knapp, Jonah@CVFPB
Cc: Lief, Chris@CVFPB
Subject: [UPDATED] Central Valley Flood Protection Board (Click to view/send)
Date: Friday, February 16, 2024 6:15:47 PM

[Some people who received this message don't often get email from zilan.chen8@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear President Dolan and Members of the Board and Staff:

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Thank you.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:36 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Corps Flood Protection Project slated for the American River

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From: Ed Harper <calidris@surewest.net>
Sent: Friday, February 23, 2024 4:07 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Corps Flood Protection Project slated for the American River

To Whom it may concern:

I am shocked by the poorly drafted project replete with errors that is designed for the American River Parkway. Furthermore, there has been little opportunity, given the time restraints, to sufficiently address the slated project. The community deserves to have their concerns addressed. Surely there is overwhelming opposition to the project as it is presently outlined. We value our riparian areas and the American River Parkway is a living jewel. The trees that define the area must be treasured, not destroyed. The U. S. Army Corp should be actively working to protect and restore vital riparian areas rather than destroying them. Given our knowledge about climate change, we know how essential trees are. Riparian corridors provide essential habitat to the vast majority of birds and terrestrial mammals. Destroying trees along the American River would have a profound and deleterious impact to the salmon fishery since trees help keep the waters cooler, provide food resources for young salmon, and enhance habitat and survival of young salmon.

Please keep in mind "No natural landscapes of California have been so altered by man as its bottomlands" (Bakker 1972). The once-lush riparian forests, forming natural vegetation corridors along many of the Central Valley's watercourses, are mostly gone today. These forests were, in Thompson's words, ". . . modified with a rapidity and completeness matched in few parts of the United States" (Thompson 1961).”

Please listen to my pleas. No destruction to our valued riparian areas of the American River Parkway.

Sincerely,

W. Edward Harper

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:32 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

-----Original Message-----
From: Nanci Kuzins <nkuzins@hotmail.com>
Sent: Friday, February 23, 2024 4:05 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.
Nanci Kuzins

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:32 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

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From: Alia Shah <aliashah1113@gmail.com>
Sent: Friday, February 23, 2024 12:45 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. The American River Parkway and its woods and wildlife are extremely valuable to me.

A The American River Parkway is such a valuable resource to the city of Sacramento. It is the place I go to support my mental wellness. Connecting with the trees and nature help me to recover from PTSD and this sanctuary is absolutely important to my mental health and wellbeing and for many, many others. It is a resource and a sanctuary for so many birds and so much diverse wildlife. It is a wildlife habitat that is home to so many creatures and animals.

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.

Alia Shah

February 23, 2024

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814
Guy.K.Romine@usace.army.mil

Mr. Josh Brown
Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, California 95281
Josh.Brown@water.ca.gov

Submitted via email: ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

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

Comments from the College Greens East Townhome Owners Association (CGETA)

Dear Mr. Romine and Mr. Brown:

1

Our comments focus on the Lower American River (LAR) components of the draft SEIS/ SEIR, particularly LAR Contracts 3B and 4B.

We respectfully request that you do not move forward with the plans described in lower American River

Contracts 3B and 4B ("Project" or "Proposed Project"). This Project should instead be significantly revised in order to avoid the loss of riparian forest, and its associated values, along the lower American River, and to avoid the harmful short and long-term impacts to the community's health, structures, property and safety, due to the construction-related activities that would be associated with the Project.

Board of Directors Responsibility for 64 Homes.

2

We, the Board of Directors, are writing on behalf of the College Greens East Townhome Owners Association (CGETA). Located along Rio Bravo Circle, it includes 64 separately owned, two-story townhomes, 4 or 6 units per building. The Buildings form an "L", with half the units backing up to the Rio Bravo levee and half backing up to Larchmont Park, so nearly all units will be impacted by the proposed work and truck routes. The Board represents these 64 units and owners, and has a fiduciary responsibility to them. While much of our comment letter addresses impacts to the regional treasure of the American River Parkway and its values to people (and wildlife) from all over the greater Sacramento

region (and beyond), we the Board of Directors must also address some specific concerns affecting the CGETA residents as part of our fiduciary responsibilities.

3 **Property Damage, Noise, Vibration, Dust, Air Pollution, Carcinogenic Diesel Exhaust.** Because the CGETA units share common walls and roofs, the Board has fiduciary responsible for maintaining structural integrity, roofing, paint, and insurance requirements of these 64 units. We are also concerned with impacts to the residents' health, safety, and well-being as part of our duties to maintain the quality of the community. All of our residents will be significantly adversely impacted by both the short-term and long-term aspects of the Project under Contract 3B and 4B.

4 We are concerned about the proposed truck route from Folsom Blvd, along Mayhew Drain, and travel the Rio Bravo levee extremely close behind the townhomes, with potentially a hundred truck trips per day, and then dumping the rock loads at the rivers edge. Based on reports of what occurred in the construction areas of the prior contracts near Howe/Sacramento State University, we understand that the noise, vibrational shocks, and dust from the rock dumping were severe enough to break windows and damage structures, and windows had to be kept closed. The Board is concerned about potential property damage to the townhomes, and also the mental health, dust, and carcinogenic diesel exposure of our residents, which include the elderly and very young children, in both cases with nowhere else to go during the long days of dust, noise, and vibrational shocks. Toxic diesel exhaust will be very close and at the 2-story height. And we wonder -- could heavy truck traffic cause stress damage to the levee (which we all rely on for flood safety)? Given most of the work is further west, is it necessary to continue to bring trucks in from Mayhew, or could other access be arranged (perhaps at Larchmont Park where there's already a staging area), to avoid loaded trucks passing for the duration of multiple revetment sections? The risk of potential structural damage to homes continues the longer the truck traffic continues.

5 The Board has a fiduciary duty to the association to request that you find another route. We question whether this "potential erosion" work is even necessary for flood safety, and could just as likely make us **MORE vulnerable** during high flow events, compared to no work at all.

"Access ramps" have additional impacts not disclosed, and which threaten a beloved 300 year old Valley oak that cannot be "mitigated".

6 We are extremely concerned about the "access ramps" that may be added behind the townhomes, which were indicated on earlier draft maps but are NOT shown in the draft SEIS/SEIR. When we requested the latest ramp information, we were told it could not be provided until the final SEIS/SEIR. This makes it impossible to know exact impacts regarding additional tree loss and visual/aesthetic impacts. Preliminary maps that showed the "access ramps" in the Mayhew/Rio Bravo/Larchmont zone showed them endangering many additional trees, and in particular threatening a beloved 300 year old Valley oak (older than our nation) in the Parkway behind the townhomes. This majestic giant is an irreplaceable visual treasure for the entire length of homes, as well as providing outstandingly remarkable value for bird and wildlife observation, photography, and enjoyment. The permanent loss of such a landmark tree would be a significant impact to our townhomes and the Parkway users. Its status cannot be determined due to the lack of "ramp" coverage in the draft SEIS/SEIR A bald

7 eagle frequents the area, and a bobcat was recently sighted under this oak. The loss of nesting cavities in large trees for owl, wood ducks and mergansers is not acknowledged or mitigated.

8 As discussed in the incorporated comment letter from Joshua Thomas (Ref 1), the California Supreme Cort said an "EIR is intended to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of its action" (under CEQA) The omission of 'ramps" and the inability to determine the fate of an irreplaceable 300-year old heritage oak for a Project of questionable efficacy for its stated purpose in "improving" flood safety, is inconsistent with that intent. Viewing with one's own eyes the denuded landscapes around Sac State does not calm an "apprehensive citizen" to hear nonspecific assurance that USACE is designing these projects to "minimize" loss to vegetation and heritage oaks.

Equipment staging, and blocked access.
Use of the north end of Larchmont Park is planned for equipment staging, with access blocked to the river, for two (or more) years. There is also no assurance in the SEIS/SEIR which/ whether trees in Larchmont Park will be saved.

9 If prior work near Howe is an indication, chain-link fencing may be planned to completely block off access from Larchmont Park (and homes) to and perhaps along the levee and the river during the Project duration, potentially from the time of "vegetation clearing" to two years more for construction activity. It would appear that our residents would be completely blocked from walking to any river trails, with dogs or canoes or kayaks, for two and a half years. Areas just east of Mayhew would have available trails, but if Mayhew Drain and levee access is blocked on the east end for truck traffic, those would not be accessible. On the west end it appears work may block all the way to Glenbrook Park. This effectively eliminates ALL river access on foot both ways for over two years. This is unnecessarily severe elimination of ALL foot access to trails and cooling waters in both directions. It should not be necessary to block access so completely. We ask that you keep foot access open behind the townhouses at the east end of Larchmont Park, and at the east end of the townhouses, and allow use of the levee to connect across the Mayhew foot bridge to the trails east of Mayhew (which are not in the construction zone). We ask that you not chain-link in any way that blocks that ability to connect to the Mayhew footbridge and the trails east of it.

Inadequate Notification.
10 It is disturbing that the only notification for this extremely destructive proposal was a postcard addressed to "Postal Customer" without any meaningful indication of the magnitude and severity of the proposed degradation of the American River Parkway, and received barely ahead of the SEIS/SEIR release. The CGETA townhomes are "adjacent parcels" to the Project. Isn't there an obligation under CEQA to provide a first-class, name-and-address letter of notification with a meaningful description of the impacts, to all adjacent parcels? Many CGETA owners remember receiving more personalized notices for prior projects (like the slurry walls), and there were on-site community meetings held at Erlewine school with USACE and SAFCA technical leads to answer people's questions, show diagrams, and discuss alternatives.

Riprapped banks will ruin access for the community, and create liability.

11 There are still original owners from 1978, and many others have lived here over 35 years (and counting). Turnover tends to be quite low, and we know of many cases where buyers waited several years for an opportunity to purchase here. Many people tell how they specifically moved here or purchased their home here to be near the American River Parkway. The community makes significant use of Larchmont Park, its safe paths children use to get to Erlewine Elementary School, and residents are just steps from the American River Parkway and its shaded and waterside trails, beaches, paddling access, picnic spots, bird and wildlife observation and photography, fishing, swimming, and opportunities for mental refreshment and solitude. This is a community where neighbors regularly meet each other walking, dog walking, pushing stollers, taking small children to the waters edge, as well as taking canoes, kayaks, and paddleboards to the water. Riprapped banks will permanently ruin waterside access. Trying to walk across will create liability for injury.

Wilderness quality experience.

12 The miles of connected unpaved, natural footpaths (designated free of motorized use or bicycle use) lined with mature trees and abundant wildlife provide not only recreation, but for many it is a vital, wilderness-quality experience that restores the physical and mental well-being of people from the stresses of urban living and summer heat. Paddling on this river segment has scenic vistas with no visible sign of urban surroundings. This is incredibly rare in the midst of a major urban area. These vistas will be permanently degraded.

Trails, Beaches, and Watercraft Access Must be Mapped, Maintained, Restored.

13 There are dozens of social trails, beaches, and water access locations, which are vital to our community and the outstandingly remarkable recreation value of the Wild and Scenic designation of the American River Parkway, yet there is zero mention of them in the draft SEIS/SEIR, and therefore likely no plan for returning them. That is a significant impact that is omitted from the SEIS/SEIR. The incorporated Trails, Beaches letter (Ref 2) includes a citizen-science map of the many affected trails and beaches.

Thousands of people use this particular forested area every year for fishing, wildlife-watching, hiking, swimming, canoeing, kayaking, paddle boarding, tubing, picnicking, relaxing, and to escape the urban environment and summer heat. This Project under Contract 3B and 4B threatens to devastate those very values, not just in the short-term but for far greater than the life of the Project, and in many cases forever changing the wild character of the American River for both people and it astonishing wildlife in the midst of a million people.

The Project in this section has not been demonstrated to be necessary or beneficial.

14 Studies show that the large trees USACE will remove to install the launchable rock features provide highly effective (and self-renewing) natural armoring against the flow velocities of a 200-year flood event (Ref 3). By removing trees, USACE may make us less safe. The Project 3B-south components at the east end of the Project need to be halted until there is clear demonstration of the need for the Project and demonstration of the actual benefit of the Project. Rather than robust justification, we see overgeneralized data, out-of-date modeling, and risk estimation methods that involve so-called “expert opinion elicitations.” This opinion method had widely differing opinions (and great potential for bias) regarding the need for such massive

revetment work, yet these weak methods are used to justify obliteration of treasured resources, without thorough consideration of all feasible alternative methods, in light of many new nature-based solutions being introduced in other USACE projects. Some opinions recommend no need for large-scale engineered intervention here at all.

15 This section has already withstood high flows, without threat to levees. This reach has already withstood velocities of the same magnitudes modeled for the design flow of 160,000 cfs, without threat to the levees. They can be expected to withstand an event of this size. If a high flow event were to occur and cause some new erosion, then surveys after the event could evaluate whether any erosion "spot fixes" are needed.

16 Do monitoring and maintenance of erosion spots; avoid all-at-once destructive revetment. The spring annual erosion surveys can be used to determine if, where, and when spot maintenance might be warranted. This would avoid the all-at-once revetment resulting in wholesale destruction that's being proposed for miles of prized mature riparian forest habitat.

Halt Contract 3B pending Folsom Dam Raise and evaluation of prior contract work.
As discussed in the letter by William Avery, "Put C3B on hold until Folsom Dam Raise Project is complete", February 14, 2024, (Ref 4) and until we see how the prior revetments actually fare in high flows. Photos from that letter show erosion at the revetments in the downstream prior contracts near SacState.

17

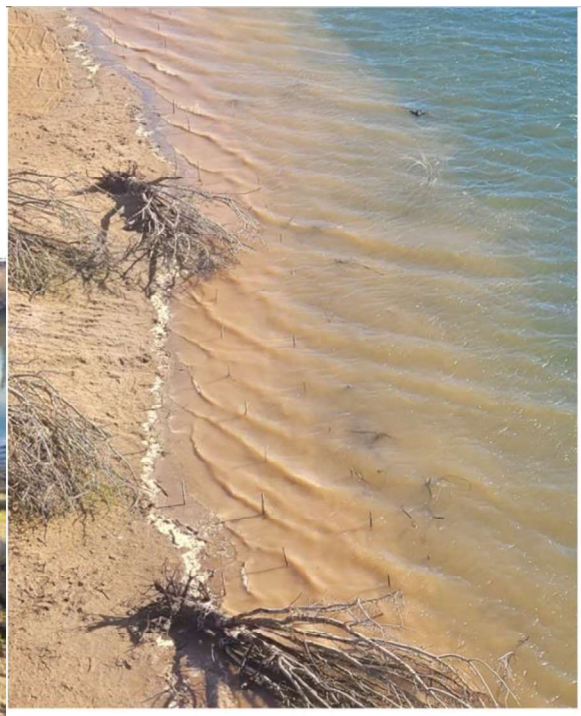

Photo of new Contract 2 soil surface being rapidly washed away by rain and river waves. Again, this level of erosion is never seen in a natural intact bank.

This calls into question the vulnerability to damage of these revetments during the years of construction, and lasting for many years given the exceedingly slow rate of vegetation regrowth beyond isolated plantings. Contract 3B should be halted until the Folsom Dam Raise is complete, AND until we see how prior work near SacState fares in high flows.

Wait for the Folsom Dam Raise completion.
Once the Folsom Dam Raise projects are complete (2027), SAFCA has said the water control manual will be revised to indicate that for a 200 year event the maximum needed release will be 115,000 cfs, not 160,000 cfs. This means the year Contract 3B would finish, it will be overdesigned for 160,000 cfs, but will have left the Parkway bare of trees.

Worse, the Contract 3B denuded, bare-soil stages of new construction would be happening in the years BEFORE the Folsom Dam Raise begins to provide extra storage capacity, so it might still need to release 160,000 cfs. The area would be vulnerable without natural trees, just when releases might still be planned for 160,000 cfs.

The Contract 3B timing may put us at MORE EROSION RISK than no work at all.
We ask that you halt Contract 3B. The Folsom Dam Raise project must be completed first. Otherwise, the timing of Contract 3B makes us more vulnerable than no work at all. (Later, reassess Contract 3B and consider nature-based solutions).

Worrisome "always strive for more" policy (and why is 92,000 cfs mentioned?)
A key flood agency was quoted regarding a policy that will "always strive for more" in terms of flood control, which included alluding to designing for higher and higher flows to be released through the levee channels. In fact, there appears to be a foretaste of this in the mention of flows of 192,000 cfs in the new "Contract 4B" scoping included in this draft SEIS/ SEIR. Where is this number coming from a new design goal? A "500 year flood? But as these design flows go higher and higher, in what can never be perfect safety, it leads to a "vicious cycle" of needing to raise and armor levees to withstand more spillway releases, and so on. Whentaken to its "logical conclusion" this philosophy eventually points to a bareconcrete channel being the only option in short, the LA River.

But in recent times, there is movement now to reverse the LA River. This is not the time to create more concrete river channels. As noted in Joshua Thomas letter (Ref 1), many natural options for various trees, grasses, and round cobble can withstand flow velocities in the ranges needed in this relatively straight stretch of river.

Even concrete channels have backfired
18 And as discussed in the Joshua Thomas letter (Ref 1), even a concrete channel approach on the San Lorenzo River near Santa Cruz didn't work out as expected by USACE, and the yearly sediment build-up that must be dredged out every year incurs very high cost to the city.

New ways to consider risk, embrace creative ideas
19 At some point, there is a societal limit for attempting to reduce risks toward zero. As with many things in life, simply being alive comes with risk from all sorts of things and as a society we land on a tolerable level of risk to avoid the extreme constraints needed to move

even closer to zero risk. Most of us have rejected the option to live in hardened underground bunkers to keep us safe from all sorts of natural and manmade hazards. We weigh exactly what things we value would have to be sacrificed in order to further reduce risk. Given the societal movements like the one to reverse the LA River, there is a growing recognition of the value of nature and natural places. And fortunately, with some creative advances, we often get better at keeping what we value AND finding options that reduce risk. Engineering with Nature publications and nature-based solutions to flood protection are ripe with possibilities. Engaging with organizations and volunteers can generate new ideas. How can we add more "space" to the system? Could the Folsom South Canal be adapted for flood bypass purposes? Could PG&E and SMUD be paid for dam modifications elsewhere in the American River watershed?

Levee, weir, bypass, and Folsom Dam upgrades have already improved flood safety.

20 The launchable rock toes/trenches proposed in Contract 3B are for "potential bank erosion" NOT new direct work on the levees. Prior projects have already improved our flood safety dramatically. Levees have been fortified by 60 to 70 foot deep slurry cut-off walls inside bringing seepage risk in this area to zero. Improvements have been made to weirs, bypasses, the Mayhew Drain, etc. The new auxiliary spillway at Folsom Dam (and new operating procedures) allow for early release of water if a storm is forecast, to make space in the reservoir. The Folsom Dam Raises (dikes, etc.) are in progress for completion in 2027. Annual erosion surveys and spot maintenance can be implemented, instead of Parkway destruction.

Inadequate analysis and mitigation, inadequate alternative methods

21 An incomplete and insufficient environmental analysis is provided by the 2016 General Reevaluation Report (GRR) and the 2023 ARCF Draft SEIS/SEIR. (Ref 1, Ref 5). Both use biased data and outdated modeling to justify one-size-fits-all riprap erosion measures to the exclusion of less environmentally destructive bioengineering alternatives. The analysis ignores or minimizes some important environmental impacts. It offers inadequate mitigation on-site (replanting with an entirely different species mix – e.g., willows and coyotebrush – that do not provide the same wildlife habitat as the lost mature trees). Off-site mitigation at a site 10 miles away does not serve the wildlife or the wildlife corridor needs in this area. We ask USACE to invoke less destructive erosion control measures that are better justified by more up-to-date modeling and more complete data. Neither the General Reevaluation Report (GRR) nor the 2023 Draft ARCF SEIS/SEIR seriously consider measures that might limit habitat destruction on the Lower American River.

The new directives for USACE to utilize nature-based solutions need to be brought to bear. There are growing examples within USACE's own erosion research arm, ERDC. We ask USACE to find options that retain existing trees for their natural erosion protection, and/or employ alternative methods that use small equipment for "spot fixes" with rounded cobble, instead of mile-long clearcutting and installation of launchable rock toes and trenches.

Impacts cannot be called "significant unavoidable" if alternatives make them "avoidable"

22 Implementing alternative methods like these for addressing potential erosion would have far less environmental impacts. That calls into question characterizing the impacts as significant "unavoidable".

Decision to use launchable rock toes/trenches is flawed, and it compounds problems

It is acknowledged that launchable rock toes and trenches have issues with erosive "scouring" at their ends --one of the very concerns for "scouring" they are suppoded to be preventing. It also leads to the practice of wanting to join one after another to avoid end scour. This harmful policy to use long continuous stretches of these devastating revetment methods in a Wild and Scenic River everywhere without prior revetment, is a policy that is no longer consistent with the high level directives to USACE for whole ecosystem approaches, nature-based solutions, engagement of the community and other agencies, and making ecosystem priorities co-equal with the mission for flood control.

23

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.

Water vs. land

We are also concerned that as the design stages progressed, there appeared to have been a decision to move to land-based installation rather than thoroughly explore/utilize potential water-based installation, in a seeming trade ("balance"?) between fish impacts and riparian impacts in this upper 3B area. The launchable rock toes/trenches, using land-based installation methods, are highly destructive of riparian habitat. These choices and trades should be revisited, along with the decision to use long stretches of launchable rock toes/trenches at all, because if much more targeted "spot fixes" for erosion were used, there would be less need for such long stretches of damage that impact either fish or riparian habitat. This would allow more options and flexibility in the "balancing", and overall lesser impacts.

This level of proposed destruction is not necessary.

We do not support the devastating methods being proposed to address potential streambank erosion concerns. In fact, we 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.

24

We are 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 4B. A much MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4B must be presented.

We 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 consideration 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.

Serpentine has not been addressed.
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.

Diesel Air Quality Risk.
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).(Ref 6). 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.

Inadequacies in data to support claims.

24 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. We incorporate by reference the comments by William Avery et al. (Ref 5). From an engineering perspective there is incomplete and inadequate documentation to support a project with such destructive impact on natural resources. 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. We do not see adequate support for the USACE claim that this upriver extension and the 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. We 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.

Proposed methods can make us more vulnerable, not safer.

Further, we 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).

Planting benches may be lost when launchable rocks launch.

Furthermore, there is acknowledged concern that if high flows were to cause the installed launchable rock 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.

A surgical approach is needed in this Protected Area.
We 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

24

Inconsistency with Wild and Scenic Rivers Act, and Outstandingly Remarkable Values.
We 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 rivers 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, used by thousands of people from all over the region.

Our unique wildlife is part of the outstandingly remarkable recreation value.
These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing wildlife in the midst of an urban area, which is highly valued by recreational Parkway users. (Visitors are amazed to find families of otters, owls, beavers, visiting bald eagles, deer, migratory birds, cavity-nesting ducks in trees, and so much more).

This is a finite, bounded habitat that must be protected to stay viable.
This destruction of the wildlife corridor threatens the sustainability of our unique wildlife experience. This is a finite, bounded habitat, making it vulnerable to loss. Displaced wildlife have no vacant territory to absorb them. The cumulative effect of past and proposed destruction threatens the viability of the wild character of this entire American River ecosystem. Allowing methods that obliterate the established landscape and dense, mature trees, which provide vital habitat in this finite, bounded area, threaten our unique wildlife. 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?

Heritage oaks will never regrow to centuries in age over jagged quarry riprap.
We 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.

Environmental justice not adequately addressed.
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. All summer, the popular spots bring families to swim and spend time at no cost. 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.

Inconsistency determination and strong conditions are needed for more targeted methods.
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.

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. 25

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.

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 respectfully request that you do not move forward with the plans described in lower American River Contracts 3B and 4B ("Project" or "Proposed Project"). This Project should instead be significantly revised in order to avoid the loss of riparian forest, and its associated values, along the lower American River, and to avoid the harmful short and long-term impacts to the community's health, structures, property and safety, due to the construction-related activities that would be associated with the Project.

26

Regional treasure deserves far greater care.
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.

/s Board of Directors of College Greens East Townhome Owners Association (CGETA)
Joe Sheffo, President, CGETA Board of Directors
Mary Beth Schwehr, Vice President, CGETA Board of Directors
Michelle Peattie
Bing Stolzenberg
Susan Mills / Bryann Shim

CC: Susan Rosebrough-Jones, National Park Service
Barbara Rice, National Park Service
Harry Williamson, National Park Service
Liz Bellas, Director, Sacramento Regional Parks
KC Sorgen, Senior Planner, Sacramento Regional Parks
Jonah Knapp, Central Valley Flood Protection Board
Supervisor Rich Desmond
Dr.Ami Bera, US House of Representatives, and Matthew Ceccato

References, incorporated by reference herein, letters we also support:
(Ref 1) Joshua Thomas, "Letter which reviews the environmental analysis and alternatives provided within the December 2023, Draft Supplemental Environmental Impact

Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project". February 22, 2024

(Ref 1) Willaim E. Avery, "Map, maintain, replace social trails and beaches, small watercraft put-in and take-out points, use only round cobble and gravel for these access points", February 13, 2024.

(Ref 3) Willaim E. Avery, "Contract C3B will result in loss of natural vegetative armoring and unmitigated loss of heritage oaks and riparian habitat, please suspend or redesign bank protection elements of C3B", February 20, 2024.

(Ref 4) William Avery, Put C3B on hold until Folsom Dam Raise Project is complete", February 14, 2024.

(Ref 5) Willaim E. Avery, Joshua Thomas, Gerald William Brattain; "Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) December 2023 Report and Appendices; Specific Comments Pertaining to Hydrology, Erosion, etc.", 9 February 2024

(Ref 6) Office of Environmental Health Hazard Assessment (OEHHA), Air Toxics Hot Spots Program, Guidance Manual for Preparation of Health Risk Assessments, February 2015. https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:30 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: Ed Corominas Real Estate Group <edcreates@gmail.com>
Sent: Friday, February 23, 2024 3:58 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.

[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)).

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.

Ed Corominas

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:27 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

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From: Stan P <srphillippe@yahoo.com>
Sent: Friday, February 23, 2024 3:54 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 have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis, American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A The American River Parkway is very important to my family, neighbors and me. We live near the proposed project area and walk or bike on the Parkway almost daily. I've taken many thousands of photos of the Parkway, river and local wildlife and led nature tours over nearly 40 years I've lived here. I served eight years on the Board of Directors of the AR Parkway Foundation and have donated thousands of dollars and many volunteer hours helping the Parkway. I've picked up litter, removed invasive plants, repaired infrastructure, and promoted the Parkway in a number of other ways. The AR Parkway is unique among urban parks and rivers.

B I do not support the methods being proposed with this project. I feel that the environmental analysis doesn't adequately characterize the significant impacts. This is a Wild and Scenic River. It deserves a much less devastating approach. The Corps has experience in designing with nature that should be used here, of all places.

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.

My additional specific concerns and comments include the following:

C I understand the recent modifications to Folsom Dam will result in less flow than the 160k cfs the Corps considered for the current project being proposed for the river. The analyses using 160k cfs should be revised to the new design flow, which I understand is considerably less.

D Maps in the EIR/EIS and appendices are often unreadable. Street names left blank. It's hard to tell where the exact project elements will be. This needs to be corrected, preferably with interactive figures and maps.

E Public outreach has been nearly non-existent. Key groups like the American River Parkway Foundation should have been consulted. The Corps should have briefed such local stakeholder groups to gain insight into the Parkway and river use. We only recently heard of the projects even though we are on the Parkway almost daily, often in the affectecd project areas. The only notices I've seen have been flyers placed by residents in the past week. When I mention the project to people using the Parkway, many are still unaware and are shocked to learn that the ugly disaster that was constructed by the Corps near H Street is being proposed here.

F Many of the trees proposed for removal have been through numerous high river flow events. Why do they need to be removed now?

G The rip rap banks are incompatible with swimming, rafting and other water activities. The AR Parkway has more visitor-days than nearly every National Park in the country. This project as designed would severely curtail many uses by eliminating little swimming and paddling and hiking areas

H The project will interfere with the many species of wildlife found on the Parkway, each of which have their own seasonal needs. The proposed project can't accommodate all the varying needs and will additionally interrupt wildlife corridors.

I What about future projects for the AR? Is the long-range plan to 'work your way up' the river? If so, ALL FUTURE PROJECTS contemplated on the river should be described and the cumulative impacts thoroughly considered. People upstream to Folsom Dam should be part of the outreach.

J In the past few years, there has been extensive planting of elderberry areas that would be destroyed by the proposed projects. How does the Corps explain the lack of coordination that now proposed to bulldoze those areas? Given this, how are we to trust the Corps ability to manage the project responsibly?

The areas of the Parkway upstream of Watt Ave are sensitive riparian habitat, and are to be protected under the Parkway Plan.

K What is proposed for the many mid-channel islands and inlets?

The Corps has published guidance on designing with nature in mind. Why do the designs we're seeing now not reflect the best of those methods, as they should for a Wild and Scenic River and highly used urban parkway?

L Because so many people are affected and are still unaware of the proposed projects, more time should be given for people to learn about it and for improved analyses to be done.

The American River Parkway is often called the “Crown Jewel of Sacramento”. Polls consistently mention it as THE best attribute of our City. These proposed decisions affect this irreplaceable treasure for generations to come, and should reflect the care that this treasure deserves. We don't want more "H Street designs" on the river!

Thank you,

Stan Phillippe

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:36 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

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From: Susan Fossum <fossumsusan@hotmail.com>
Sent: Friday, February 23, 2024 4:58 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: jonah.knapp@CVFlood.ca.gov; RichDesmond@saccounty.gov; Bellas. Liz <bellase@saccounty.net>
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 in this email letter focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

A I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. I have lived in Sacramento, near the American River Parkway, for almost 50 years now. I have hiked, biked with my husband and 2 sons (they actually learned to bike on the Parkway) during that time and have over the last 30 years ridden my horses on the equestrian/hiking trail as part of a volunteer patrol that works in concert with Sacramento County Regional Parks Rangers as an extra pair of 'eyes and ears' on the Parkway. During this time I have become intimately involved with the dirt paths that meander through the beautiful oaks, sycamores and other trees, bushes that line the

shores of the river providing necessary and essential habitat for the birds/waterfowl and marine life of the American River. My belief is that the forward progress of the current draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B, will seriously impact the integrity of the entire Parkway, the wildlife that call the Parkway their home, and those recreational users, including myself, who value the recreational opportunities that exist. My belief is that the actions proposed by the Corps are not in compliance with policies laid out in the American River Parkway Plan nor the Natural Resources Management Plan that is a supplemental document within the Parkway Plan.

B

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.

I am in support of the critique document provided by Director Liz Bellas, Director of Sacramento County Regional Parks, signed and dated February 23, 2024. I would ask that the Corps engage with Sacramento County Regional Parks and use the Natural Resources Management Plan to take a comprehensive look at all the natural resources and recreational opportunities that would be impacted by the current proposed actions of Contracts 3B, and 4A and 4B.

C

I request that the Corps re-engage and stand-up the Bank Protection Group as well as the Technical and Resource Advisory Committee (TARAC) to re-evaluate the integrity and thoroughness of the project proposals and actions.

The American River Parkway is often called 'the Crown Jewel of Sacramento' and your decisions will affect this irreplaceable treasure for generations to come and should reflect the care that this public asset deserves.

Sincerely,

Susan Fossum

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:34 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comment on USACE Proposal 3B

From: Ben Eastvold <beastvold@gmail.com>
Sent: Friday, February 23, 2024 4:58 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comment on USACE Proposal 3B

To Whom It May Concern,

I know many people have already written about the specifics of the proposal and their concerns. I, too, am concerned and really hoping we can plan a way forward everyone can feel good about.

1 With that said, my concern lies more with the manner this project is going forward. It seems as if there is very little effort to win over the public and stakeholders. As one who uses the riverfront walking trails regularly, I want to be excited about how this project will help the community and the added benefit it will bring. That hasn't happened yet.

In the KCRA interview with William Polk, Senior Project Manager, American River Erosion, he did little to assuage the concerns of members of our community and instead just told us this is continuing to move forward.

2 More effort needs to be given towards public outreach. Not just giving out information, but helping us sees the value this project will bring. We need some persuasion. I want this to be a win-win scenario - we do necessary work to protect our river and levees, AND bring added value to the communities this impacts.

Sincerely,

Ben Eastvold

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:31 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: Carey Knecht <cknecht@gmail.com>
Sent: Friday, February 23, 2024 4:56 PM
To: PublicCommentARCF16@water.ca.gov; 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) Comment Recipients:

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

2 I am writing as a parent of a child who attends O.W. Erlewine Elementary School and also of an incoming kindergartener. The school is very close to Larchmont Park and has its playground along Whitewater Way, which appears to be one of the construction travel routes. I have concerns about the noise and pollution impacts on the children who attend this school, as well as on the overall community both around the school and along the truck routes.

3 I have numerous questions below, and as you will see at the end, I would like to respectfully request (1) that greater analysis occur related to the impacts of noise and health impacts on the surrounding community, particularly to school children; (2) that additional project alternatives consider (a) a project with a much lighter footprint and less construction activity and (b) alternative staging and truck route areas that are away from residences and schools; and (3) that additional mitigations be added to better protect the school and community.

I walk my child to school, and two to three times each week, I join him for lunch. As part of these activities, I witness the extensive use of outdoor spaces at O.W. Erlewine. The school is not a single building with indoor hallways connecting different spaces. Instead, the school classrooms are set up “motel-style,” accessible via an outdoor sidewalk. Students, teachers, and administrators travel outdoors between the office, classrooms, and a lunchroom / auditorium.

The daily routine of the school involves students spending significant time outside. In the morning prior to the starting bell, students play outdoors and then line up at the designated time, in an outdoor paved area. They

travel to their classroom along outdoor sidewalks. Both recess and physical education occurs outdoors. At lunchtime, or at other times for school assemblies, they travel to an auditorium / lunchroom via this same outdoor path. Although many students eat indoors, a subset of students, including my son typically eat outdoors under an overhead awning. For those who do eat indoors, the lunchroom generally has its doors open. This can increase ventilation, reduce the spread of respiratory illness, and increase the ability of school staff to monitor children's movement as they finish eating lunch and head to recess. The school also has outdoor garden areas. During the after-school hours, the City of Sacramento's "4th R" program makes additional use of the playground.

At this school, two kindergarten classrooms and the kindergarten playground are on the northeast side of the building, making them the closest areas to Larchmont Park. When my son was a kindergartener, in addition to recess, these young children would gather in a circle at the end of their school time to sing a song before they adjourn.

I am saddened and concerned to imagine the impact on the children and their daily routine during the years in which this construction would occur, especially as I consider sending my younger child to the school. What will be the impact on daily life at the school and the health of the students and faculty to have heavy-duty truck trips delivering truckloads of rock and off-road construction equipment operating in the background?

4 It is my understanding that this school serves a population that is socioeconomically diverse. According to the 2022-2023 O.W. Erlewine School Accountability Report Card, 69 percent of the school's students are socioeconomically disadvantaged, and 20 percent of the students have disabilities. Not only does O.W. Erlewine appear to receive funds under Title 1 ("Improving the Academic Achievement of the Disadvantaged"), but 67.7% of students are eligible for Free or Reduced Price Lunch, which requires a family population to be below 1.85 times the federal poverty level, according to the California Department of Education's "Unduplicated Student Poverty – Free or Reduced-Price Meals Data 2022–23" file for the most recent year available (2022-2023).

I have the following questions and concerns about the students' and staff members' proximity to the construction activities:

1. How far from the school will the staging area be situated? The area seemingly designated on the map as an area for use as a staging area is one of the sections of the park that is very close to the front of the school. Utilizing Google Maps aerial imagery, my best estimate is that it would start less than 300 feet from the school's front flagpole (possibly significantly less).

2. How far from the school will the construction along the river occur? Again utilizing Google Maps aerial imagery, it appears to me that the top of the levee and any truck travel there would be between 400 and 500 feet from the school's front flagpole, and that the water's edge might be approximately 600 feet.

3. How far from the playground and outdoor physical education area will the truck travel along Whitewater Way be?

I have the following questions about the noise that will occur due to truck travel and staging-area activity:

4. What are the average and loudest sound levels that will occur during the school day in the staging area of Larchmont Park and along the truck travel routes?

5. What are the typical impacts of this noise level on human activity? For example, will the kindergarteners still be able to sing end-of-class songs outdoors if the teacher would like to do so?

5 6. Did the SEIR/SEIS or original Common Features EIR/EIS analyze the impact of this noise level on students' and teachers' mental and physical health, both via any acute noise and also any impacts of chronic loud noise?

I believe that the noise impact could be significant. For instance, the World Health Organization lists the following impacts of noise on children.

> "Impairment of early childhood development and education caused by noise may have lifelong effects on academic achievement and health. Studies and statistics on the effects of chronic exposure to aircraft noise on children have found:
>
> - consistent evidence that noise exposure harms cognitive performance;
> - consistent association with impaired well-being and motivation to a slightly more limited extent;
> - moderate evidence of effects on blood pressure and catecholamine hormone secretion."

I also have concerns about the air quality impacts that could result. Air pollution from construction activities can create health risks, particularly for children, as their respiratory systems are still developing. As they play and exercise, children inhale deeply. I am particularly interested in the impacts on the youngest children, such as my incoming kindergartener, as the kindergarten classroom is closest to the staging area. Here are some questions I have about the health impacts:

7. What analysis was done related to the health impacts of exposure to the dust and emissions? How did that take into account the risks to the students who are youngest and/or otherwise most vulnerable?

6

8. In particular, what analysis was done related to the health impacts of Diesel Particulate Matter?

9. To what extent was the proximity of the school to the staging and construction areas considered? For some pollution types, the concentrations decrease with distance from the source. (See for instance: https://www.sciencedirect.com/science/article/abs/pii/S1352231002003540.) How do the distances noted above relate to the distances over which air pollution concentrations decline?

10. To what extent was the background level of air quality and health burdens in the area considered? Exploring the Climate & Economic Justice Screening Tool (CEJST) (https://screeningtool.geoplatform.gov/), I noticed that in census tract 06067009106 where the school is located, the level of inhalable particles, 2.5 micrometers or smaller (PM 2.5) is in the 98th percentile, the amount of diesel exhaust in the air is already at the 57th percentile, and the share of people who have been told they have asthma is 65th percentile.

11. To what extent do the socioeconomic disadvantages experienced by a majority of the students increase their susceptibility to risk from both noise and air quality impacts and how was this addressed in the analysis?

I believe a thorough analysis of the health risks from the noise and pollution generated by this construction activity may reveal that the significance of these impacts on health and on environmental justice has been understated.

I would also like to request that additional project alternatives consider a project with a much lighter footprint and less construction activity. For instance, an alternative could consider replacing the heavy emphasis on rip-rap with a project design focused on bioengineering, nature-based solutions, green infrastructure, and monitoring of the levee and riverbank conditions to address any small areas where maintenance is needed. In addition, I would like to request that alternative staging and truck routes be considered.

7

Finally, I would like to suggest that additional mitigations be examined to better protect the school and community, such as the use of "cleaner" trucks and equipment, upgrades to the air filters or sound buffering in the school, and free medical services to any students or school staff who may experience any health incidences that could be related to these exposures, such as an asthma attack.

8

Thank you for your consideration of these comments and of other comments from concerned residents.

Carey Knecht

Dorff, Becky

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:29 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca

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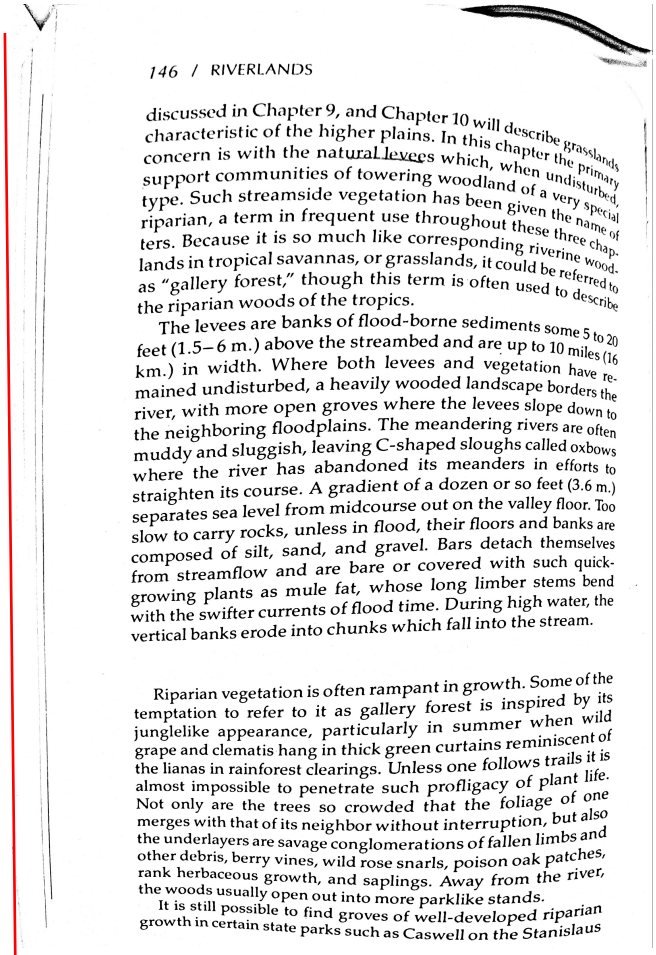
From: Josh Thomas <joshjhthomas@gmail.com>
Sent: Friday, February 23, 2024 4:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca

Correction: For my comment (Joshua Thomas, February 22, 2024), footnote 137, I cited page 144 of *An Island Called California*. The correct citation is page 146, which I've provided a picture of below.

Elna Bakker, *An Island Called California: An Ecological Introduction to its Natural Communities, Second Edition, Revised and Expanded* (Berkeley: University of California Press, 1984), 146.



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discussed in Chapter 9, and Chapter 10 will describe grasslands characteristic of the higher plains. In this chapter the primary concern is with the natural levees which, when undisturbed, support communities of towering woodland of a very special type. Such streamside vegetation has been given the name of riparian, a term in frequent use throughout these three chapters. Because it is so much like corresponding riverine woodlands in tropical savannas, or grasslands, it could be referred to as "gallery forest," though this term is often used to describe the riparian woods of the tropics.

The levees are banks of flood-borne sediments some 5 to 20 feet (1.5–6 m.) above the streambed and are up to 10 miles (16 km.) in width. Where both levees and vegetation have remained undisturbed, a heavily wooded landscape borders the river, with more open groves where the levees slope down to the neighboring floodplains. The meandering rivers are often muddy and sluggish, leaving C-shaped sloughs called oxbows where the river has abandoned its meanders in efforts to straighten its course. A gradient of a dozen or so feet (3.6 m.) separates sea level from midcourse out on the valley floor. Too slow to carry rocks, unless in flood, their floors and banks are composed of silt, sand, and gravel. Bars detach themselves from streamflow and are bare or covered with such quick-growing plants as mule fat, whose long limber stems bend with the swifter currents of flood time. During high water, the vertical banks erode into chunks which fall into the stream.

Riparian vegetation is often rampant in growth. Some of the temptation to refer to it as gallery forest is inspired by its junglelike appearance, particularly in summer when wild grape and clematis hang in thick green curtains reminiscent of the lianas in rainforest clearings. Unless one follows trails it is almost impossible to penetrate such profligacy of plant life. Not only are the trees so crowded that the foliage of one merges with that of its neighbor without interruption, but also the underlayers are savage conglomerations of fallen limbs and other debris, berry vines, wild rose snarls, poison oak patches, rank herbaceous growth, and saplings. Away from the river, the woods usually open out into more parklike stands.

It is still possible to find groves of well-developed riparian growth in certain state parks such as Caswell on the Stanislaus

1

On Fri, Feb 23, 2024 at 4:44 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

> Jeffrey F. Mount, *California Rivers and Streams: The Conflict Between Fluvial Process and Land Use* (Berkeley: University of California Press, 1995), p. 105, 302, and 304.

viewed as composed primarily of the parent material or bedrock. The C horizon, which is usually light colored due to the absence of abundant organic material, is where the initial breakdown of the bedrock is occurring. In between the A and C horizons is the B horizon. Material leached from the A horizon by percolating water accumulates in the B horizon, collecting as pockets of clay-rich material. Since the material leached from the elluviation zone accumulates in the B horizon, it is known as the *illuviation* zone.

In perhaps the ultimate exercise in button-sorting known to the physical sciences, the soil scientists (or pedologists) have sliced up the soil classification pie into myriad, infinitesimal divisions. It would be pointless to review the entire soil classification scheme here. Explanation of even the simplest classification groups, like *intrazonal hydromorphic planosols*, is beyond the goals of this text. The U.S. Soil Conservation Service has created a complex hierarchical classification scheme that recognizes ten orders, twenty-nine common suborders, and innumerable great groups and subgroups. The combinations are endless and, except for experienced pedologists, complicated to use. Suffice it to point out that these combinations reflect a variety of physical and chemical characteristics of soils as well as the climate zone in which they develop.

It should be no surprise that soils in California vary greatly in their thickness, structure, and composition. Climate, vegetation, topography, bedrock, and time all play a role in the development of soils. In general, older soils from shallow slopes in wetter climates tend to be thick, organic-rich, and better developed. Younger soils from more arid climates with steeper topography are thinner, with more poorly developed layering (fig. 6.3). Most important for the rivers of California is the resistance of soils to erosion. Thick, well-developed soils that have well-established vegetative covers tend to be more resistant to erosion. The binding action of roots and clays along with high infiltration capacities increase a soil's resistance to erosion and reduce its contribution of sediment into rivers. Poorly developed, relatively thin soils, whether due to climate, bedrock, or bad land use practices, tend to erode quickly, producing high sediment yields.

HOW EROSION WORKS

The transfer of the by-products of physical and chemical weathering into California's rivers takes place primarily by direct runoff of rainfall. In many steep watersheds with highly unstable soils and bedrock, mass wasting processes (discussed below) may contribute significant amounts of sediment during and after large rainfall events. Snowmelt, groundwater discharge, and subsurface flow contribute only minor amounts of sediment to rivers in California.

Since a straightened river travels a shorter distance, the slope, velocity, and stream power of the river are increased. The break in slope at the upstream end of the straightened reach acts like a knickpoint. Increased competence and headward migration of this knickpoint can produce scouring upstream of the straightened channel; decline in competence that occurs at the downstream end of the straightened reach can lead to local deposition of material and aggradation of the channel, ultimately reducing its flow capacity.

Irrespective of changes in channel pattern or gradient, simply widening or deepening channel reaches to accommodate larger flows can also trigger numerous hydraulic changes that may ultimately undo the original alterations. Enlarged channels are usually designed to handle a specific, very large flow. During the design phase the impact of lower discharge flows is commonly ignored since they will clearly be contained by the channel. Yet the size and shape of a natural river channel is a product of the more frequent, intermediate flows associated with bankfull stage conditions, not the very large or extreme event. An increase in a channel's cross section through dredging produces a decline in the competence of these intermediate flows, because velocity and overall stream power are decreased. In this way, the channel is not capable of handling the sediment load that is delivered to it, resulting in localized deposition. In most cases, the channel size will be reduced utnil a cross section capable of handling the sediment load is restored.

The pitfalls of channel modification are illustrated in urban areas throughout California. The San Lorenzo River, which runs through downtown Santa Cruz, illustrates this problem well (fig. 15.10). Widespread flooding in downtown Santa Cruz in 1955 created a demand for extensive flood control projects in the area. The U.S. Army Corps of Engineers proposed a series of levees and channel alterations that would afford the downtown area protection from the 100-year flood. The design developed by the corps was the blunt instrument approach most popular at the time. The San Lorenzo River channel was straightened and, more important, deepened and widened. All riparian vegetation was removed from the riverbanks to reduce roughness; channel walls were lined with concrete and riprap to enhance stability. This "new and improved" river became a nearly straight concrete ditch—the pinnacle of river engineering efficiency.

Fig. 15.10. Problems associated with channel modification along the San Lorenzo River in Santa Cruz. Top: Channel was dredged, straightened, and lined by the U.S. Army Corps of Engineers to increase flood capacity. *Bottom:* Channel aggradation within improved reach of river led to significant reduction in flow capacity. Up until recently, the city spent millions of dollars yearly to dredge the channel, only to have it refill during winter floods. Photographs from Griggs 1982.

Less than 10 years after completion of the project, the San Lorenzo River had attempted to restore its profile by filling this ditch with more than 12 million cubic feet of sediment. In the end, it was calculated that the channel could only handle the 25- to 30-year flood. Millions of dollars and the complete destruction of the river had provided little to no real improvement in flood protection. To deal with this, Santa Cruz initiated a very expensive maintenance program. Up until recently, every year, like swallows returning to San Juan Capistrano, D9 tractors rumbled into the San Lorenzo ditch to push the sediment around into little piles, hoping that the next winter's flows would scour it and move it away. Not surprisingly, during very high discharge events, such as occurred during 1982 and 1983, a great deal of the sediment *is* scoured, temporarily increasing the channel capacity. However, the amount of scouring does not substantially increase the capacity of the channel to handle extreme floods.

Impact of Levees

4

According to the Army Corps of Engineers, there are over 5,000 miles of levees in California. In the Sacramento/San Joaquin Delta alone, there are more than 1,100 miles of levees. These levees have turned out to be both a blessing and a curse. On the positive side, many levee projects have saved local communities from regular inundation and the associated Draconian restrictions of the National Flood Insurance Program. In addition, the nation's most productive agricultural region, the Central Valley, would be flooded on a regular basis were it not for the extensive levee system. This is especially true of the delta. As a result of intense farming and associated oxidation of peat-rich soils, the elevation of large tracts of land in the delta has been declining steadily. Today, thousands of acres of farmland lie as much as 15 feet below sea level. If there were no levees, the constant interaction between freshwater flowing in from the Sacramento and San Joaquin rivers and marine waters pushed inland by wind and tides would keep much of the region underwater all year, making it impossible to farm. In addition, the massive pumping of freshwater out of the delta into the Central Valley and State Water projects would be impossible without the levee system. Agriculture and urban development have benefited greatly from the leveeing of the rivers.

On the negative side, the proliferation of levees along California's rivers has enhanced flooding hazards in some areas. Moreover, even those levees that are carefully engineered and maintained by the corps will eventually fail. The concentrated destruction associated with these failures and the inherent difficulty in predicting failures can make levees an untrustworthy partner in flood management.

On Fri, Feb 23, 2024 at 4:34 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

O. S. Scheifele, 1928. "Protection of River Banks and Levees." *The Canadian Engineer.*

The Canadian Engineer

A Weekly Paper for Civil Engineers and Contractors

Protection of River Banks and Levees

Employment of Angular Submerged Willow Tree Planting to Stop Erosion and Slides of Earth Banks of Rivers, Canals, Lakes, Levees, Cuts and Fills, and for General Flood Control—Some Projects in Canada and the United States Described

By O. S. SCHEIFELE
Waterloo, Ont.

MANY civil engineers and engineers in the employ of governments, railroads and various other big corporations have been of great service in assisting to perfect a simple and natural process as a substitute for the many other methods, such as timber and sheet piling, concrete or stone, rip-rap, etc., to keep rivers, creeks, lakes and contractors were privileged to bid on solution such as stone, rip-rap or concrete to comply with the laws of the corporations where no contract could be let for a patented system without competitive bidding.

Many engineers who will read this article will remember other articles published during the last four years detailing

FIG. 1—PROJECT ON MISSOURI RIVER, KANSAS CITY DISTRICT

earth cuts within their present area or channel at a small cost.

To verify this, the writer will cite various individual contracts awarded under competitive bidding where outside the theory of planting willow logs or poles in trenches in a horizontal or angular position in harmony with the slopes of a river or lake shore bank on a 3 to 1 or 45 degree angle with the result that a tree and root growth will develop the

FIG. 2—MISSISSIPPI RIVER PROJECT
Illustration Shows Original Formation Along Bank of River Near Dubouse, Iowa

FIG. 3—MISSISSIPPI RIVER PROJECT
Willow Poles 40-ft. Long in Position to be Protected With Brush, Stones and Wire Fencing

Digitized by Go

entire length of each pole planted whether it be 5 or 50 ft. long. This gives many advantages over individual vertical tree planting to reinforce an earth slope.

Advantages Over Vertical Tree Planting

First. For example, the poles are applied on a lake shore or river bank, the butt end of the pole being set into the river bottom or beach at toe of incline bank in harmony with

FIG. 4—MISSISSIPPI RIVER PROJECT
Brush Mattress for Protection of Willow Poles and Bank

the desired slope with the result that the tree growth cannot slide and will immediately assist to prop and support in giving the bank the proper slope and rigidity.

Second. Where logs are placed along a water course at approximately 4-ft. intervals, the ice and water are greatly hindered from creating a straight hedge after the desired slope is made.

Third. A joint row of trees 40 ft. in length growing on a 35 degree slope will never fall, roots and all, into the river.

Fourth. In the average soil formation it would be very difficult to grow an individual tree owing to lack of moisture 20 ft. above the water level. With the joint system of tree planting, the foot of the willow logs is constantly resting submerged below the low water mark, and owing to the joint circulation of a score of trees growing vertically from the willow log, the trees at the extreme upper part of the pole will grow quite as prolifically as those close to moisture.

FIG. 5—MISSISSIPPI RIVER PROJECT, ROCK ISLAND DISTRICT CONSTRUCTION NEAR DUBUQUE, IOWA

Fifth. The last and most valuable advantage is shown on many water courses such as the Mississippi, Missouri and Gatineau Rivers, and others which have their source in the mountains or in the extreme north and which have an annual second flood in late May or June when the growing season is on. Tree and vegetation growth are drowned between the ordinary water level and the high water mark and no resisting root fibre exists to retard erosion. By planting trees in the novel position a portion will always be above high water level and supply the entire length with sufficient air and sun to sustain life throughout the flood period, and the most extensive root development will be between the low and high water level where needed to resist erosion.

Engineers and others can study the drawings and cuts of various constructions and learn from them how the writer can immediately stop erosion with temporary artificial protection until the tree and root growth is advanced sufficiently to withstand an occasional flood or storm. Formation and attack varies largely, and each formation will require individual study to meet existing conditions with a silt-collecting construction to give immediate service. The writer is grateful for the privilege of being allowed to demonstrate the system on various formations, and is glad to report that results have been very gratifying on most of the formations allotted for an application of the system.

Gatineau River Construction

For cross comparison, I will cite the Gatineau River construction for the Dominion Government in the Ottawa district. For stone rip-rap on identically the same formations adjacent to the writer's work up-stream the Government paid $16 per lin. ft. of river bank while I received approximately $5.50 per lin. ft. The one construction has now stood the test for three years and the second two seasons, and I feel

FIG. 6—CUT CONTROL NEAR HORNEL, N.Y., ERIE RAILROAD

assured it is past all danger from flood attacks owing to advanced growth and root development.

In 1926, as an experiment, the city of Buffalo awarded the writer a contract amounting to approximately $27,000, based at $4 per lin. ft. of river bank. In 1927 I was again awarded a contract by the city of Buffalo for $25,600 at $4 per lin. ft. But I was obliged to secure same by competitive bidding to comply with city laws since my system is patented. Stone rip-rap was considered the next cheapest solution and bids were asked and advertised on stone rip-rap. The lowest bid on same was $19 per lin. ft. of bank.

Mississippi and Missouri Rivers

The writer was privileged to demonstrate his system on both the Mississippi and Missouri Rivers last fall for the U.S. Engineering Department, which will have to produce the same desired results as their standard rivetment and stone rip-rap river bank protection. Both contracts have been executed and must be maintained for three years, and in each case the cost is less than half the cost of U.S. systems.

The various cuts are typical views from some of the constructions. Fig. 1 shows in the foreground the original formations on the Missouri River east of Kansas City, where the system was applied in the fall of 1927. Fig. 1 also shows bank sloped 3 to 1 and angular willow planting applied with construction nearly complete. The distance from crest of bank to low water level on slope is approximately 40 ft. where willow poles are planted and protected as detailed on accompanying diagram.

In addition to a single silt collecting mat of brush, stone and cross-woven wire fencing as shown on diagram at toe of willow poles, I applied four sections which extend approximately 30 ft. into the river beyond the original toe of bank and water level which should give equal service to U.S. standard river rivetment work, to a 30-ft. depth, which was considered extensive enough at portion of river in question. Where deeper scour is expected additional sections should be added.

Figs. 2, 3, 4 and 5 are Mississippi views near Dubuque, Iowa. Fig. 2 shows original formation; Fig. 3, bank sloped approximately 2 to 1 and willow poles in position; Fig. 4, local willow brush over top of willow poles, extending 20 ft. into the river to protect under scour; Fig. 5, work complete in accordance with the diagram.

Figs. 6 and 7 show the Erie R.R. near Hornel, N.Y., on a creek cut control. The creek in question is approximately two miles in length from source to mouth and rises 900 ft. At intervals of heavy rains up the valley the flood waters carry silt of various kinds, which they deposit on the railroad, causing frequent delay in transportation. Steam shovel

FIG. 7—RESULTS OBTAINED IN THREE YEARS ERIE RAILROAD PROJECT

operations have been resorted to several times and basins have been excavated for the next occurrence. Each operation became more expensive owing to lack of space to deposit material. Concrete dams had been considered at intervals up the creek, but the cost was almost prohibitive. In the spring of 1923 the writer planted approximately 65,000 running ft. of white willow poles on the slopes of the creek channels and to protect the extensive planting from being carried down stream in case of an early flood before the trees became fortified by a few years' growth, he resorted to local young trees and built timber catch-basins at intervals. The result was that the basins have been sufficient to date, although most of them are brimful of silt.

Fig. 6 shows a timber basin and three years' growth of willow forcing its way up through the accumulated silt. As the timber walls weaken the willow growth gets stronger and a permanent solution is assured. Instead of the creek bed cutting deeper, it is filling up.

Fig. 7 shows the growth attained on upper regions of creek and the practical impossibility of the creek getting out of its present channel. Both banks are lined with trees and the creek channel is gradually becoming lined with roots, limiting the possibilities of deeper cutting.

Highway Bank Protection

Figs. 8 and 9 illustrate results attained for the Ontario Department of Highways near St. Thomas, Ont. The spring flood of 1925 eroded the river bank to the extent of 11 ft. and almost destroyed the roadbed approaching the bridge. An elaborate concrete wing dam was contemplated and finally the angular willow planting system was applied at the small cost of $2 per lin. ft. of river bank. Fig. 8 shows formations at time of construction and Fig. 9 shows results attained in two years. Maintenance expires in spring of 1928 and all engineers familiar with demonstration claim a permanent solution.

Fig. 10 shows results attained on Lake Erie near Port Stanley. A few years previous to 1924 the Dominion Govern-

FIG. 8—ONTARIO HIGHWAY PROJECT ON RIVER NEAR ST. THOMAS, ONT.
Original Formation Before Construction Was Undertaken

ment built 200 ft. of sheet-piling groins at 300-ft. intervals to protect summer homes, but with no results. The cut shows how the earth bank had receded beyond the Government groin, necessitating the removal of many cottages. In the fall of 1924 the writer demonstrated his angular willow planting and Fig. 10 shows results attained in three years. For temporary protection a lumber retaining wall or sand trap was built near the water line on the beach with results to date showing extensive beach reclaimed. The sand trap has

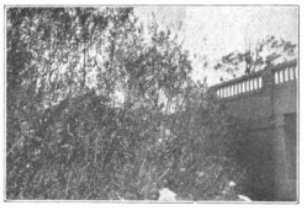


FIG. 9—SHOWING GROWTH IN FIVE YEARS AT PROJECT NEAR ST. THOMAS, ONT.

elevated the beach approximately 5 ft. and the water has receded double the width of original beach.

Erie Canal Project

Figs. 11 and 12 illustrate results on the Erie Canal in the State of New York, near Clyde. Fig. 11 shows original formation in the fall of 1926. This bank was planted to willow as shown in diagram on an approximate 2 to 1 slope, while Fig. 12 shows results attained in 12 months at an approximate cost of $3 per lin. ft. of bank with a three-year maintenance guarantee.

Fig. 13 shows results attained in three years from horizontal tree planting on a prairie farm for a windbreak or shelter belt. Only one continuous row of willow poles was placed in an ordinary plowed furrow and then slightly covered with earth. Results far exceed individual vertical tree

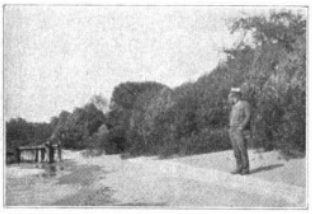


FIG. 10—LAKE ERIE PROJECT AT PORT STANLEY
Results Obtained in Three Years. Note the Lumber Sand Trap

planting. First, there is no tree or stake sticking up in the air to be whipped about by strong winds and to be kept alive by disconnected roots. Secondly, seedlings or cuttings supplied by nurseries of Government forestry farms are small and of weak vitality. If weather conditions are not favorable immediately after planting they are burnt or dried up by sun or strong winds and results are often discouraging on the treeless farm.

If poles of any length varying in thickness from 2 to 4 in. are planted in shallow trenches similar to the planting of potatoes, readers can be assured that results will far exceed individual vertical planting, providing the poles or limbs are cut and planted in proper seasons. Equally satisfactory results can be obtained from any of the cottonwood and poplar family of trees as from the willow.

To demonstrate the theory that poles planted horizontally give better results than cuttings. Many readers of this

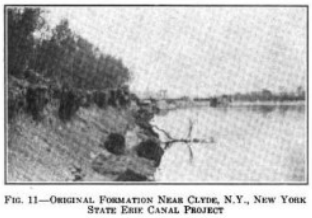


FIG. 11—ORIGINAL FORMATION NEAR CLYDE, N.Y., NEW YORK STATE ERIE CANAL PROJECT

article have noticed piles of cordwood and poles of varying diameter. The smaller limbs soon burn where often some of the bigger limbs start to sprout and keep growing well into summer even when not in contact with any earth whatever. The stronger vitality and extra moisture in the thicker wood causes this. If 2 or 3 ft. of sprouts can be produced from the vitality of a log not in contact with any moisture except rain and dew, what might be expected if this same log was resting an inch below good cultivated land? Roots as well as limbs would develop along the entire length of poles and from 3 to 6 ft. in length the first season.

The forestry branch of the Ontario Government, at the writer's request, made demonstrations for comparison between individual vertical and horizontal planting on pure blow sand to prevent sand dunes from covering good farm land and property. An official report the first year stated that individual planting was largely a failure, while horizontal pole planting is a marked success. Prospects are bright for reforesting drifting sand dunes. An average growth of 2 ft. was attained and roots were traced to a distance of 15 ft. from the buried logs, seeking after moisture.

Mississippi Flood Control

The biggest problem in the United States to-day for engineers and others to solve is how to reinforce and elevate the levees that a disaster similar to that of last spring cannot occur again. Fig. 14 is a view personally secured near Memphis, Tenn, in the early part of June last. The big flood was then playing havoc in the lower valley but was fast receding in this district. An extensive tour was made to study flood conditions. Many sections of the huge levees were extensively eroded and partly washed away by the flood waters. Without doubt some of the levees inspected would

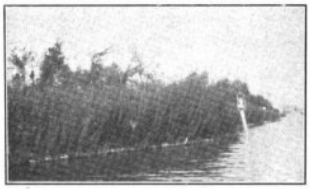


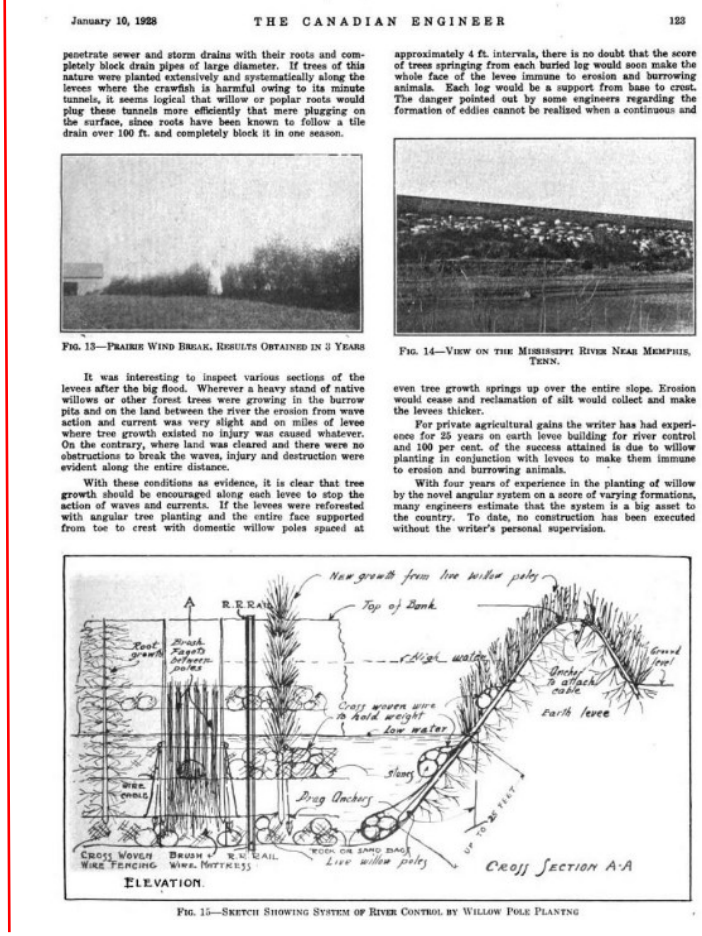
FIG. 12—NEW YORK STATE PROJECT, RESULTS OBTAINED IN 12 MONTHS

have been completely washed away had not the railroads operating over the levee shown in the illustration and the State of Arkansas provided an army of men and trainloads of sandbags to stop the destruction of hugh waves and prevent the river from eating its way through these levees, which are built of pure river silt. After the thin layer of sod and root fibre is lapped away mostly by wave action, this loose soil has very slight resisting power and many breaks occur before the river runs over the crest, cut away before erosion could be stopped with sandbags as shown on cut, as it is impossible to have material and labor along the hundreds of miles of levees at the critical moment.

With the assurance that levees do break before the water goes over the top, the building of higher and thicker levees will not make them positively proof against destruction. They should be reinforced, at least on the river side, by some method that has a stronger resistance to wave action than Bermuda grass. Concrete and stone rip-rap are two methods, but the cost would be too great. Many engineers are favorably inclined towards tree growth and others are opposed for various reasons. First, experience has shown that where a clump of trees were allowed to spring up on the river face of levees eddies were caused and erosion started down stream from trees. Second, levees must be constantly patrolled for the detection of burrowing animals, to prevent them from cutting a tunnel. The crawfish or crab seems to be the most destructive in lower regions where the river flows on a higher level than the surrounding country. In these regions the writer would strongly advise the angular planting of willows on the land side of levees. The crawfish do not operate on a dry levee 11 months in the year and only cut tunnels where they have water following them.

Willow Extensive Root System

Certain species of trees are barred by many of our cities for boulevard and lawn planting owing to the fact that they



January 10, 1928 THE CANADIAN ENGINEER 123

penetrate sewer and storm drains with their roots and completely block drain pipes of large diameter. If trees of this nature were planted extensively and systematically along the levees where the crawfish is harmful owing to its minute tunnels, it seems logical that willow or poplar roots would plug these tunnels more efficiently that mere plugging on the surface, since roots have been known to follow a tile drain over 100 ft. and completely block it in one season.

FIG. 13—PRAIRIE WIND BREAK, RESULTS OBTAINED IN 3 YEARS

FIG. 14—VIEW ON THE MISSISSIPPI RIVER NEAR MEMPHIS, TENN.

It was interesting to inspect various sections of the levees after the big flood. Wherever a heavy stand of native willows or other forest trees were growing in the burrow pits and on the land between the river the erosion from wave action and current was very slight and on miles of levee where tree growth existed no injury was caused whatever. On the contrary, where land was cleared and there were no obstructions to break the waves, injury and destruction were evident along the entire distance.

With these conditions as evidence, it is clear that tree growth should be encouraged along each levee to stop the action of waves and currents. If the levees were reforested with angular tree planting and the entire face supported from toe to crest with domestic willow poles spaced at approximately 4 ft. intervals, there is no doubt that the score of trees springing from each buried log would soon make the whole face of the levee immune to erosion and burrowing animals. Each log would be a support from base to crest. The danger pointed out by some engineers regarding the formation of eddies cannot be realized when a continuous and even tree growth springs up over the entire slope. Erosion would cease and reclamation of silt would collect and make the levees thicker.

For private agricultural gains the writer has had experience for 25 years on earth levee building for river control and 100 per cent. of the success attained is due to willow planting in conjunction with levees to make them immune to erosion and burrowing animals.

With four years of experience in the planting of willow by the novel angular system on a score of varying formations, many engineers estimate that the system is a big asset to the country. To date, no construction has been executed without the writer's personal supervision.

FIG. 15—SKETCH SHOWING SYSTEM OF RIVER CONTROL BY WILLOW POLE PLANTING

On Fri, Feb 23, 2024 at 3:22 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

Central Valley Flood Protection Plan Conservation Strategy (November 2016), Appendix D. Vegetation Management Strategy

Annalisa Louise Batanides Tuel. 2018. "Levee Vegetation Management in California: An Overview of Law, Policy, and Science, and Recommendations for Addressing Vegetation Management Challenges," Environs

On Fri, Feb 23, 2024 at 3:17 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

J.P. Dwyer and D.R. Larsen, 1997. "Value of Woody River Corridors in Levee Protection Along the Missouri River in 1993."

Elizabeth A. Cook, 2003. "Missouri River Flood of 1993: Role of Woody Corridor Width in Levee Protection." Journal of the American Water Resources Association.

Rood, S. B., Bigelow, S. G., Polzin, M. L., Gill, K. M., and Coburn, C. A. (2015). Biological bank protection: trees are more effective than grasses at resisting erosion from major river floods. Ecohydrol., 8: 772–779. Doi: 10.1002/eco.1544.
Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).

People ex rel. Department of Public Works v. Bosio, 47 Cal. App. 3d 495

California Oaks Foundation, "Care of California's Native Oaks" in Bulletin of the California Oak Foundation (Oakland, 2016)

Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011

Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System

Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild and Scenic Rivers System

On Fri, Feb 23, 2024 at 3:00 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

MBK Engineers, "2017 Lower American River Streambank Erosion Monitoring Report," (May 2018)

On Fri, Feb 23, 2024 at 2:58 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

Dear United States Army Corps of Engineers and CA Department of Water Resources public comment recipients,

I am submitting the following documents to make them part of the project record.

FEMA, *Engineering with Nature: Alternative Techniques to Riprap Bank Stabilization*

CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15126.6(a).

We Advocate Through Environmental Review v. County of Siskiyou (April 20, 2022) 78. Cal.App.5th

Federal Register, Vol. 46, No. 15, January 23, 1981.

Wild and Scenic Rivers Act

Friends of Mammoth v. Board of Supervisors, 8 Cal. 3d 247

HDR David Ford Consulting Engineers, "Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4," (2019)

MBK Engineers, "2017 Lower American River Streambank Erosion Monitoring Report," (May 2018)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:39 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Parkway Devistation on the American River

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From: Jhilleg102 <jhilleg102@aol.com>
Sent: Friday, February 23, 2024 4:58 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Parkway Devistation on the American River

Corp. of Engineers,

1 Survey, evaluate and assess the damage this Project has caused between the Guy West and Howe Ave. bridges.

The lower release gates from Folsom Lake greatly reduce the chance of flooding.

2 I urge you to pause and consider alternative and less destructive and less costly designs.

I lived adjacent to the levy witness the American rise to within three feet of cresting the levy. 1n 1986. This event make me fully value of flood control. I am a former employee of the Corp in Washington D.C..

Respectfully,

JON A. HILLEGEIST

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:34 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Oppose Devastation Along American River Parkway the wild in Scenic Jewel of Sacramento
Attachments: 20240221_162011.jpg; 20240219_111107.jpg

From: Naomi Ennis <stopparkwaydevastation@gmail.com>
Sent: Friday, February 23, 2024 4:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Oppose Devastation Along American River Parkway the wild in Scenic Jewel of Sacramento

Hello,

I agree with the attached documentation provided by Dr. Michelle Stevens & Joshua Thomas.

1 I have attached several photos that show the erosion that has happened within the last 2 months in the project work area that was completed by the US Army Corps of Engineers. This erosion was not happening before the project work the project work was supposed to make the riverbank stronger and less prone to erosion but the opposite has happened.

2 In addition, I am writing to ask that you and Sacramento County officials persuade the US Army Corp of Engineers to perform a MORE TARGETED and LESS DESTRUCTIVE approach to Erosion Control Projects 3B and 4.
The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans to bulldoze over 500 trees on the American River Parkway for bank erosion protection. The USACE claim that this protection is needed is based on minimal, overgeneralized data. I strongly question whether this work is necessary along this section of the American River.

Further, I believe the USACE approach to leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come) is just as

likely to put us at risk in high water flows as no work at all. I strongly oppose the brute force bulldozing methods the Army Corps proposes along 4 more miles of the Wild and Scenic American River. We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (parts of prior Erosion Control Projects), will fare in high water flows. I do not support the USACE claim that this extension and the methods planned are needed for flood safety.

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!

We need your support as you coordinate with Sacramento Regional Parks regarding the American River Parkway Wild and Scenic River status, and I urge you to stand up for this special stretch of the American River Parkway and 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.
Naomi Ennis

Sent from Yahoo Mail on Android

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:42 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

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From: Christie Vallance <christiev44@gmail.com>
Sent: Friday, February 23, 2024 4:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report 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. 1

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. The American River Parkway is very important to me and as a wildlife corridor.

Concern:

I recently noticed in your International Guidelines on Nature and Nature Based Features for Flood Risk Management under your Engineering with Nature Program, that for your projects there was a focus on gathering community support with "early and frequent engagement with stakeholders and affected communities." (p 23). Can you explain the methods you used to conduct early and frequent engagement with our community? Can you share the notifications materials beyond the postcard received in December of 2023 with select neighbors 2

that helped reach out to the community? Can you also share the neighborhoods identified that received these postcards and can you confirm whether the RiverBlu or Apex apartment residents received notification of your work, and if not, the reason? Can you share if any postings were placed publicly along the river to help inform the public?

Respectfully,

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:40 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Concerns with disrepancies on velocity models impacting PRoject 3b for USACE work on American river

From: Alicia Eastvold <aliciaeastvold@gmail.com>
Sent: Friday, February 23, 2024 4:58 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; SupervisorFrost@saccounty.gov
Subject: [Non-DoD Source] Concerns with disrepancies on velocity models impacting PRoject 3b for USACE work on American river

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

1 As a concerned citizen, I wanted to understand Project 3b for the lower American River. From the USACE reports and presentations I learned that the measures are built off the premise that there is significant erosion occurring at the riverbanks for this area. I went to study this further with yourUSACE's ARCF GRR Appendix C on Erosion Protection Analysis which makes up the premise of the USACE's design for Project 3b. When I reviewed the images of hydraulic models on Pg 41, and 42, they appear to show a very different data than other models. I noticed that the Lower American River Streambank Erosion Monitoring Report of 2017's velocity contours shows very different data (image attached). Can you explain why these show such significantly different data for velocity along the riverbank? Can you explain how your project plan is informed by this information?

See below images for comparison.

Thank you,

Alicia Eastvold

Larchmont Resident

Image from USACE's GRR Report:

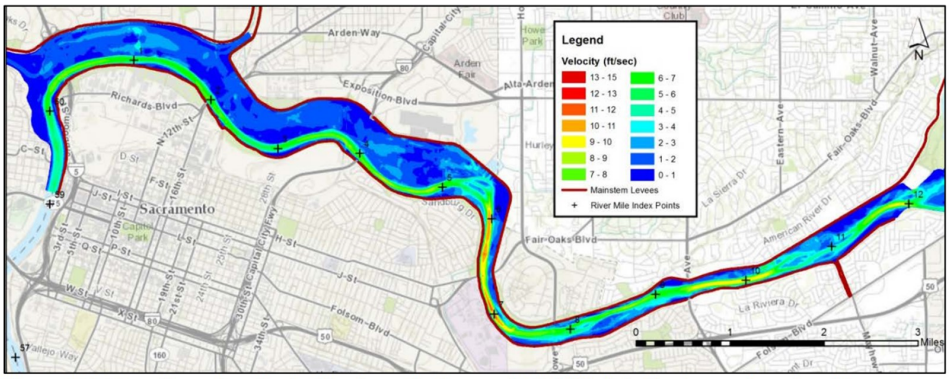
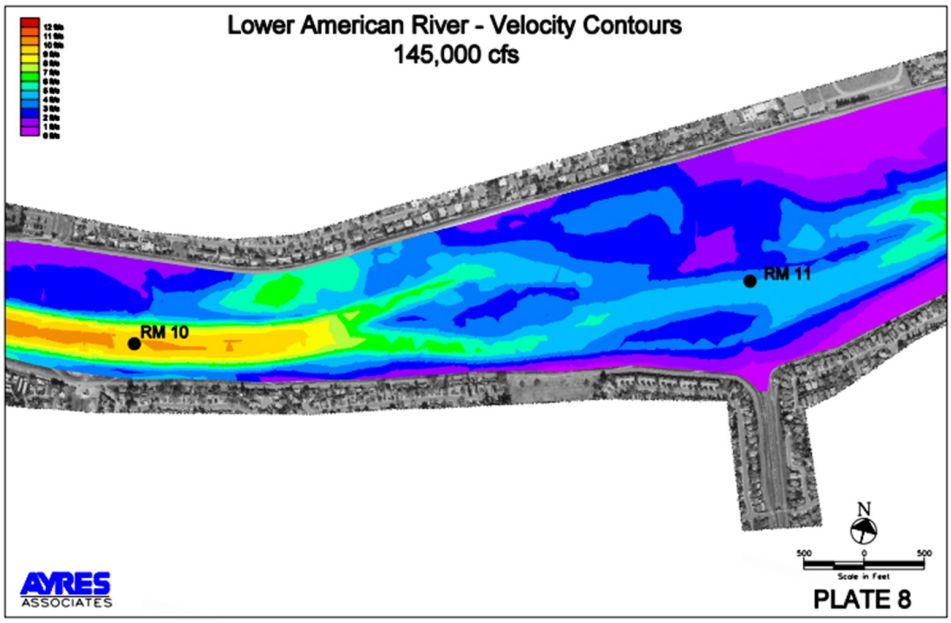


Figure 4-4. Two-dimensional velocities for a discharge of 115,000 cfs in the Lower American River

Alternate study that shows significantly different velocities at river.



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:29 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Public Comment on American River Common Features (ARCF) 2016 Draft SEIS-SEIR - December 2023
Attachments: Wildlife at Kassis_022124docx (1).pdf; ARCF DSEIS BRECA comments F (1).pdf; M-24-03-Advancing-Climate-Resilience-through-Climate-Smart-Infrastructure-Investments Budget Office of the White House.pdf; 164986 Dry Creek Enhancement.pdf

From: Brenda Gustin <bkgustin@gmail.com>
Sent: Friday, February 23, 2024 4:49 PM
To: Central Valley Flood Protection Board <Questions@cvflood.ca.gov>; Jane Dolan <Jane.dolan@cvflood.ca.gov>; Michael.Wright@cvflood.ca.gov; Greg.Harvey@cvflood.ca.gov; Andrea.Buckley@cvflood.ca.gov; Kathryn.Baines@cvflood.ca.gov; Amber.Woertink@cvflood.ca.gov
Cc: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Public Comment on American River Common Features (ARCF) 2016 Draft SEIS-SEIR - December 2023

Thank you for your work.

I am here to comment as a Volunteer of Preserve the American River regarding the American River Common Features Project.

As our local, non-Federal Agency who will review this project, we implore you to help the residents of this city understand and work with you and the Army Corp by:

1

1. Taking the time to review the copious number of public comments and reports submitted thus far.
2. Re-open the Public Comment Period.
3. Hold an on-site meeting to discuss this proposal with attendance by the professionals who will implement this project to answer questions.
4. Hold a workshop after the on-site meeting.
5. Hold a Public Hearing for testimony to be recorded on the Public Record.

This proposal by the US Army Corp of Engineers (Corp) now covers 73 acres of riparian tree canopy and appears to project the destruction of significant aspects of the ecological diversity living along and in the river which is irreplaceable. The American River Wildlife Corridor extends 23 miles along this Federal and State Designated Wild and Scenic River covering 5,000 acres.

2 Mitigation measures have not been fully established to satisfy the needs this project will produce. Documentation such as the recent study by Biologist, K. Shawn Smallwood of the Kassis property upstream and the American River (see attached) provides detailed information on the need to protect and preserve this

unique habitat. In fact, the Kassis property is the Central Valley Flood Protection Board's Designated Floodway and can be utilized to mitigate loss of habitat and support higher flows in the river. This might help the Corp implement their Engineering with Nature Program and disburse high flows into the floodway.

3 Please slow this project down. Expediency doesn't make for a better project.

While it is imperative to protect our city from future flood incidents, our evaluation of the project proposal reveals excessive measures are planned to address potential streambank erosion. Documentation presented does not provide adequate justification for these highly destructive actions as "necessary" for (or would even actually improve) flood safety along this section of the American River. The public has not been sufficiently
4 informed nor acknowledged as a well-informed local source of information and expertise acquired over decades of observation. The Corp stated in your last workshop their goal to "Communicate, communicate and communicate as soon as possible". To date, that has been us asking questions without specific answers.

Our desire is to help the Army Corp accomplish their goal to "Communicate……..as soon as possible." We are committed to collaborating and are proving our abilities through reports, emails and public comments being submitted daily.

As our local, non-Federal Lead Agency, please facilitate a partnership with the Corp and us. Please require the Corp to provide a clear proposal with specific information to evaluate whether more suitable efforts are appropriate. Right now, it is not even clear which trees will be removed or will stay. This basic information needs to be provided.

Please work with the Bank Protection Group, USACE and the public on a collaborative level to succeed with a sustainable, safe habitat utilizing nature-based solutions and "Engineering with Nature".

5 We know this can be done well and invite you to visit the American River Trees website to see the research, information and better ways to accomplish protection for our citizens from erosion by working with nature-based solutions preserving the natural baseline of our Wild and Scenic River. There are substantial socio-ecological benefits the American River provides to our ecosystem, its wildlife, the habitat and citizens who depend upon its present health and wellness. This website is ever-green and continues to be enhanced so please visit often. Bring us in to work alongside you.

6 A great example of this type of collaboration done with USACE with more narrowly tailored measures is the Dry Creek Project in Healdsburg, California. The unique environment of the American River deserves this type of focused and professional attention.

7 Let's do it right now! Our City, your agency, USACE and the citizens have the ability, expertise and knowledge. There is no reason to repeat similar mistakes as were made in 1936 with the LA River. Having to step in decades later to correct known errors in judgment is not the legacy we wish to pass on to future generations. We can employ our talents to create a successful project aligned with the Wild and Scenic Rivers Act and the Biden-Harris administration's "Nature Based Solutions Roadmap" directing all of its agencies to implement nature-based solutions with each of its projects. The White House November 2023 Memorandum "emphasizes that nature-based solutions should not be an afterthought in the climate fight, but rather a starting point for building resilience, to ensure communities benefit from investments for decades to come." (see attached)

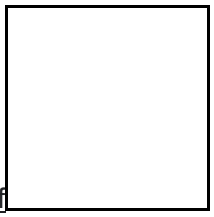
Included with this Public Comment are a few letters and reports that have been submitted thus far. Mr. Josh Thomas' Public Comment for your February 23, 2024 Board Meeting shows major erosion happening on USACE revetment projects near Sac State because of the ordinary high-water mark and ordinary February 2024 rains.

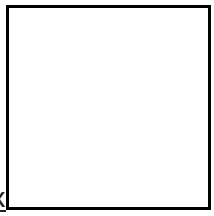
8 Please do take the time to review these and respond to our request to hold an onsite public meeting, a Workshop, and public hearing so that you will make an informed decision to deny the SEIS/SEIR and work on your project with USACE to revise these contracts utilizing their Engineering with Nature Program and live up to its byline: "the intentional alignment of natural and engineering processes to efficiently and sustainably deliver economic, environmental, and social benefits through collaboration."

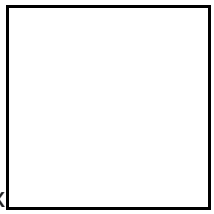
Sincerely,

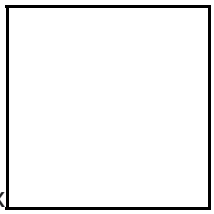
Brenda Gustin

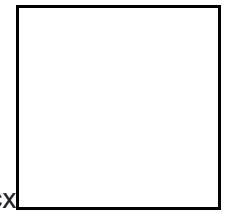
Volunteer and Concerned Native & Citizen of Sacramento

CVFPB 2-9-24 Meeting by Sergio Diaz.pdf 

Feb 9 2024 CVFPB Public Comment by Peter Spaulding.docx 

February 23, 2024 CVFPB Public Comment by Joshua Thomas.docx 

Josh Thomas' Public Comment to CVFPB Workshop 2.9.2024.docx 

USACE and DWR Comment by Josh.docx 

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:53 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

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From: Naomi Ennis <stopparkwaydevastation@gmail.com>
Sent: Friday, February 23, 2024 5:05 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):

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)).

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.

There must be a better US Army Corp of Engineers plan for American River 3B project

Laura Petty <laura@laurapettylaw.com>

Fri 2/23/2024 5:00 PM

To:RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>
Cc:PatHume@saccounty.gov <PatHume@saccounty.gov>;Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>

You don't often get email from laura@laurapettylaw.com. Learn why this is important

Dear Supervisor Desmond and Supervisor Hume, and Mr. Knapp and Mr. Lief,

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

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

Further, I believe the proposal to leave bare dirt banks for 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 Corps of Engineers 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.

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 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 Corps of Engineers to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you.

Laura M. Petty
she/her/hers
Certified Criminal Law Specialist
State Bar of Cal. Board of Legal Specialization

This message is confidential and intended only for the person to whom it was addressed. If you are not the intended recipient, do not copy, distribute, or take any action related to this message. If you received this in error, please notify Laura Petty by email or by calling 805-242-2286.

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

Patricia Prendergast <pprender22@yahoo.com>

Fri 2/23/2024 4:11 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 pprender22@yahoo.com. Learn why this is important

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,
Patricia Prendergast

INDIV-740

Central Valley Flood Protection Board Friday February 23, 2004 Agenda Item # 6

Josh Thomas <joshjhthomas@gmail.com>

Fri 2/23/2024 8:26 AM

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

You don't often get email from joshjhthomas@gmail.com. Learn why this is important

Dear President Dolan and Board Members,

Thank you for taking my comment and for all the great work you do keeping the Sacramento Region safe from flooding. My name is Joshua Thomas. I am a Ph.D. candidate at UC Davis who just finished a dissertation on the history of flood control in the Sacramento Valley.

1 I want to address the Army Corps of Engineers false dichotomy between public safety and preservation. The Corps likes to claim that to keep Sacramento safe from flooding, they must decimate habitats along the Lower American River to install launchable riprap. Yesterday, William Polk of the Army Corps of Engineers told NBC News that they were moving forward with their flood control plans as fast possible even though they have yet to receive most of the public comments, some of which come from Professional Engineers and members of the Bank Protection Working Group, who are asking for a pause and redesign. This stated intent to move forward as fast as possible before even looking at the public comments violates both the letter and spirit of the California Environmental Quality Act and the National Environmental Policy Act, which state that the comment period is meant to help the public work with lead agencies to develop plans that are less environmentally destructive. The Army Corps of Engineers seems intent on treating the public review process as a cursory exercise.

2 The Army Corps of Engineers in their comments to the public have stated that they ruled out less destructive alternatives to riprap because river velocities are two high. They base this claim off of 2-d hydraulic modeling. Recent Caltrans commissioned research looked at areas of the Lower American River with dense strands of mature trees. Their 3-d hydraulic modeling showed that with dense strands of mature trees, velocities along the banks were much slower than what 2-d hydraulic models show. At much slower velocities, the Army Corps of Engineers could consider less destructive measures, including using smaller cobble or adding different types of vegetation. Removing trees to install riprap may make us less safe, because river velocities will dramatically increase across the banks, exposing them to greater risk of erosion for years to come, which is already coming to fruition on their recently completed projects near Sac State. To ascertain less destructive methods for protecting our precious Lower American River, I am asking that the Central Valley Flood Protection Board hold a public workshop on Contract 3B and 4B of the December 2023 Draft SEIS/SEIR, pause Contract 3B in the meantime, initiate an independent peer review of the project, and reinstate the bank protection working group.

Sincerely,
Joshua Thomas

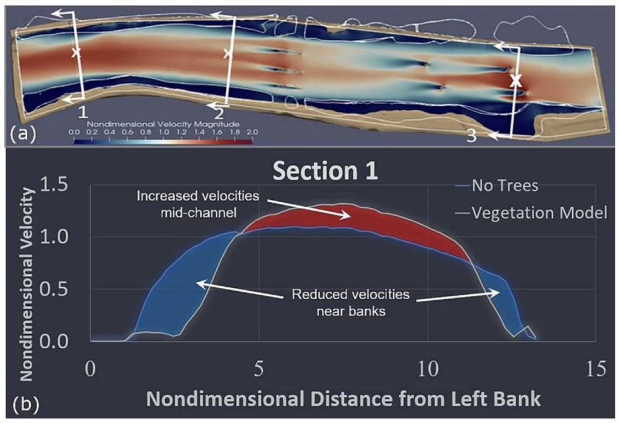

FIGURE 7 Cross-sections were compared along three locations of the American River (a). At Section 1-1, the vegetation model significantly damped out flows along both banks (blue regions) and increased velocities in the centre of the channel (red region) compared to LES without trees (b).

From

Kevin Flora and Ali Khosronejad. 2023. "Uncertainty Quantification of Bank Vegetation Impacts on the Flood Flow Field in the American River California Using Large-Eddy Simulations." *Earth Surface Processes and Landforms*. https://doi.org/10.1002/esp.5745: 7.

Also from the academic team which worked with Caltrans to come up with high-fidelity hydrodynamic modeling along the Lower American River.

> Incorporating vegetation into high-fidelity computational models is imperative for obtaining accurate modeling results. In this study, when trees were accounted for in large-eddy simulations, a drastic effect on redistributing the high-velocity flow away from the banks and increasing its magnitude near the center of the American River was observed.

-Kevin Flora, Christian Santoni, and Ali Khosronejad. 2021. "Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River Under Flood Conditions." *Journal of Hydraulic Engineering*: 05021006-12. https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912.

Here are pictures of major erosion that is happening on USACE revetment projects near Sac State because of the ordinary high water mark and ordinary February 2024 rains.

In the picture below, you can see that where there are trees, there is no erosion.

Notably, academic research has shown that mature trees very effectively armor riparian banks against erosion, even more so than grass. You can see in the first picture there is no erosion around where USACE spared the tree. Rood et al (2014) recommended that "riparian forests should be conserved to provide bank stability and to maintain and equilibrium of river and floodplain dynamics."

-S.B. Rood, S.G. Bigelow, M.L Polzin, K.M. Gill, and C.A. Coburn. (2015). “Biological bank protection: trees are more effective than grasses at resisting erosion from major river floods.” *Ecohydrol*, 8: 772–779.
Doi: 10.1002/eco.1544.

INDIV-741

Central Valley Flood Protection Board

Lori Ward <fosllori64@gmail.com>

Fri 2/23/2024 12:08 AM

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

[Some people who received this message don't often get email from fosllori64@gmail.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.

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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.

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

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

Thank you.

In peace,
Lori Ward

Sent from my iPhone

INDIV-742

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

LESLIE WATTS <leslie.watts@prodigy.net>

Fri 2/23/2024 2:20 PM

To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Cc:ARCF_SEIS@usace.army.mil <ARCF_SEIS@usace.army.mil>;DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>;richdesmond@saccounty.gov <richdesmond@saccounty.gov>; Matthew.Ceccato@mail.house.gov <Matthew.Ceccato@mail.house.gov>;Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>;BellasE@saccounty.net <BellasE@saccounty.net>

You don't often get email from leslie.watts@prodigy.net. Learn why this is important

Dear President Dolan and Members of the Board and Staff:

I appreciate the dedication of 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 Avenue.

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.

I respectfully request that your Board:

Conduct 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 beyond Feb. 23, 2024, to ensure the above occurs;

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 USACE 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. My neighborhood community strongly questions 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. 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 canoe access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial 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.

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 USACE 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 USACE 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 as 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 for your consideration of these concerns.
Leslie A. Watts

INDIV-743

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

Harry Weller <hwastrel@sbcglobal.net>

Fri 2/23/2024 12:32 AM

To:ARCF_SEIS@usace.army.mil <ARCF_SEIS@usace.army.mil>
Cc:DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>;SorgenKC@saccounty.gov <SorgenKC@saccounty.gov>;Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>;Kelvin.Lum@mail.house.gov <Kelvin.Lum@mail.house.gov>;Matthew.Ceccato@mail.house.gov <Matthew.Ceccato@mail.house.gov>;BellasE@saccounty.net <BellasE@saccounty.net>;RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>;Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>;SupervisorSerna@saccounty.gov <SupervisorSerna@saccounty.gov>;SupervisorKennedy@saccounty.gov <SupervisorKennedy@saccounty.gov>; Barbara_Rice@nps.gov <Barbara_Rice@nps.gov>;hbwillia44@gmail.com <hbwillia44@gmail.com>;PatHume@saccounty.gov <PatHume@saccounty.gov>

You don't often get email from hwastrel@sbcglobal.net. Learn why this is important

My respectful greetings to US Army Corps of Engineers (USACE) and Dept. of Water Resources (DWR).

1 I add my voice to the many concerned Sacramento area residents who treasure the American River Parkway and the related trails along the north and south banks. Erosion control projects in the area, particularly east of Watt Ave., are described in the "2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)", specifically Contracts 3B, and 4B.

2 The riparian forest ecosystem in this area has withstood severe floods for decades. There are historic oaks which are thrived for over a century, which is strong evidence that this section of the river is not subject to serious erosion. It is not clear why the SEIS/SEIR analysis does not use "modern, advanced modeling for peak 160,000 cubic feet per second flow [which] predicts that **water velocities are low at the levees**" in the lower American River (for example, on the south bank of the river in the general area of Larchmont Park). (quote from "List of Key Concerns", https://www.americanrivertrees.org/official-comments-to-usace).

The map of the area affected by Contract 3B shows that the riparian forest on the south bank of the American River will be devastated, through a combination of actual re-engineering of the river bank ("Construction Buffer"), and enormous related disruption of the woodlands simply to get the large construction equipment to the river ("Construction Access"). (Document: American River Common Features, 2016 Flood Risk Management Project, Sacramento, California, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details) (link to document: https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/SEIS-SEIR/ARCF_Draft-SEIS-SEIR_Dec2023.pdf).

You are no doubt already familiar with the many other very persuasive objections raised by the American River Trees organization and associated groups.

3 The assumptions that the SEIS/SEIR is based on need to be reviewed much more thoroughly, not just by parties whose entire purpose is to design and perform large engineering projects, but by parties

who are instead focused on what the cost/benefit ratio would be, and whether these projects are even necessary in the first place.

Specific sites in the areas covered by these contracts may benefit from modest erosion remediation engineering, but it is not clear from the SEIS/SEIR that this much more limited, specifically targeted analysis was ever done. 4

No further work should be planned for these contracts until the numerous objections are considered, and the merits of much smaller, much more reasonable amount of erosion control work are analyzed.

Regards,
Harry Weller, Sacramento resident, **VOTER**, and daily enthusiastic user of the American River Parkway

INDIV-744

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

Pamela Hatton <pamelahattonito@icloud.com>

Fri 2/23/2024 1:25 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 pamelahattonito@icloud.com. Learn why this is important

Dear President Dolan and Members of the Board and Staff:

I appreciate that you dedicate your time and expertise to serve on the Board and listen 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. 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; and 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.

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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.

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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!

And, yes, this is a “form letter,” but, as indicated by my modifications, I have read it. ***AND I AGREE WITH THE ISSUES IT ADDRESSES.***

Thank you,

Pamela Hatton

INDIV-745

American River USACE Contracts 3B, 4A, 4B

Lisa Howard <lisad_howard@yahoo.com>

Fri 2/23/2024 1:30 PM

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Cc:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;BellasE@saccounty.net <BellasE@saccounty.net>

You don't often get email from lisad_howard@yahoo.com. Learn why this is important

1 I am writing today to share my concerns about planned work on the lower American River, particularly Contracts 3B, and 4A and 4B. I have serious concerns with the proposed project.

2 Trees are an important stabilizing agent along rivers. Their root systems can bind together soil and strengthen the riverbank. Yet the USACE is proposing the elimination of more than 500 trees, including heritage oaks, to create an artificial riprap.

This would leave the banks bare for two years of construction and put us at more risk of erosion and flooding. Historically, levee failures are more associated with areas where riparian forests have been thinned or clear-cut.

2 Clear-cutting mature trees will also destroy wildlife habitat and remove carbon-sequestering trees at a time when we should be protecting mature trees that are already sequestering carbon and helping to keep our air clear. It would take decades for new growth to provide the benefits already being provided by the trees along the American River.

3 Clear-cutting would:
- pose a threat to critical habitats for various fish species, including Chinook Salmon, Central Valley Steelhead, and North American Green Sturgeon;
- disrupt the nesting, mating, and feeding habits of local and migratory bird populations, many of which have already seen drastic declines in number over the past few decades;
- destroy the shade from large canopies, which could affect the survival rate of various species of salmonids;
- disturb natural animal behaviors such as nesting, spawning, and feeding activities

4 In addition, the American River is designated as a Wild and Scenic destination, and an artificial shoreline would detract from the natural beauty that earned the river that designation.

I encourage you to:

- evaluate alternative methods that are more targeted and less destructive to habitat and wildlife.

- consider "spot fixes," small equipment, and maintenance.

- support the use of stabilizing vegetation, aligning with the National Park Service's recommendation.

Thank you for your consideration and your efforts to ensure the American River remains a healthy and beautiful part of Sacramento.

Sincerely,
Lisa Howard
Rocklin, CA

To Whom it May Concern,

1 I am writing this comment to critique's USACE's inadequate environmental analysis in the 2023 Draft ARC SEIS/SEIR and to implore USACE to consider less destructive, alternative erosion control measures that are better justified by more up-to-date modeling and more complete data. The risk to our Wild and Scenic River, to endangered species, to precious resources of the American River Parkway, and to the safety of Sacramento Region are too great for USACE not to reconsider their current proposed measures for American River Erosion Contract 3B in the 2023 Draft ARCF SEIS/SEIR.

2 Neither the General Reevaluation Report nor the 2023 Draft ARCF SEIS/SEIR seriously considered measures that might have limited habitat destruction on the Lower American River. The "no-action alternative" in the 2023 Draft ARCF SEIS/SEIR is simply the proposal of the 2016 GRR, which includes "bank protection" (i.e. riprap armoring) and launchable rock trenches.[1] The 2023 preferred alternative is basically the 2016 preferred alternative with the addition of launchable rock toes and tiebacks.[2] Launchable rock toes are functionally the same as launchable rock trenches except they are placed at rivers edge instead of higher up the bank.[3] Tiebacks are riprap laid perpendicular instead of parallel to the river.[4] No biotechnical or bioengineering alternatives were explored. The "choice" USACE offers the public is between riprap and more riprap. This choice, according to a USACE presentation to the Lower American River Task Force in December of 2023, will remove at least 685 trees between Howe Ave and Larchmont Community Park.[5]

3 USACE's choice to give the public essentially no alternative besides riprap makes a mockery of the review process. CEQ calls the alternatives section "the heart of the EIS."[6] This section, according to CEQ, is supposed to rigorously explore and objectively evaluate all reasonable alternatives.[7] CEQA requires that an EIR provide a range of alternatives to a project that "will feasibly attain most of the basic objectives of the project."[8] Note that these alternatives do not have to attain all of the objectives of a project, but there must be a choice so as to "foster informed decision making and public participation."[9] While CEQA does allow the lead agency to limit the range of alternatives to "ones that would avoid or substantially lessen any of the significant effects of the project," it is clear the law intends that the public and decision makers should have an actual range of choices.[10] Such intent was articulated by the Third District of

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[1] American River Watershed Common Features General Reevaluation Report, 3-48.
[2] 2023 ARCF Draft SEIS/SEIR, 3-11, 3-25, and 3-26.
[3] Ibid, 3-29.
[4] Ibid.
[5] Lower American River Task Force, December 12, 2023. https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf
[6] Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).
[7] Ibid.
[8] CEQA, 15126.6(a).
[9] Ibid.
[10] Ibid.

Appeal in We Advocate Through Environmental Review v. County of Siskiyou. In this case, the Court ruled that making project objectives so narrow "as to preclude any alternative other than the Project" violated CEQA.[11] In particular, the Court scolded the County for ensuring that "the results of its alternatives analysis would be a foregone conclusion."[12] In making the alternatives a foregone conclusion, the County "transformed the EIR's alternatives section—often described as part of the 'core of the EIR'--into an empty formality."[13] By limiting the public's choice to nothing but riprap and more riprap for Contract 3B, USACE's has turned the public review process for the 2023 ARCF Draft SEIS/SEIR into an empty formality.

4 The alternatives of riprap or more riprap not only mocks the review process, it likely runs afoul of both the National and State Wild and Scenic River Acts. These facts require preserving protected rivers "in free flowing condition."[14] The national WSRA defines free flowing as "existing or flowing in natural condition without impoundment, diversion, straightening, **rip-rapping**, or other modification of the waterway."[15] The WSRA allows for the existence of riprap on the waterway at the time of a river's inclusion, but clarifies that "this shall not be construed to authorize, intend, or encourage future construction of such structures within components of the national wild and scenic rivers system."[16] The California Wild and Scenic Rivers Act only makes an explicit exception for the Eel River, declaring that "nothing in this chapter shall be construed to prohibit any measures for flood protection, structural or nonstructural, necessary for the protection of lives and property along the Eel River."[17] The fact that the California WSRA explicitly makes an exception for the Eel River indicates that the CWSRA was meant to prohibit the construction of new flood control measures, structural or non-structural, including riprapping, on all the other rivers included in the CWSRA system.

5 USACE claims that river velocities ruled out less destructive alternatives, but that position is not justified by the technical documents they cite. USACE explained in a letter to Rene Hamlin in the 2016 Final EIS/EIR Public Involvement Appendix of the 2016 Final EIS/EIR that

> the proposed bank protection and launchable rock trench measures are the only two possible measures that could address the significant erosion problem on the American River. Other measures were eliminated from consideration because the river velocities render them infeasible. More information on the erosion problem on the American River can be found in the Erosion Protection Appendix to the GRR (GRR Appendix C, Attachment E).[18]

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[11] We Advocate Through Environmental Review v. County of Siskiyou (April 20, 2022) 78.Cal.App.5th 683.
[12] Ibid.
[13] Ibid.
[14] Wild and Scenic Rivers Act, Sec. 1(b). California Wild and Scenic Rivers Act, 5093.50.
[15] Wild and Scenic Rivers Act, Sec. 15(b).
[16] Ibid.
[17] California Wild and Scenic Rivers Act, 5093.57.
[18] ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement.

The document USACE advised Rene Hamlin to read, the Erosion Protection Report, casts doubt on USACE's one size fits all approach. The experts consulted in the Erosion Protection Report understood that for USACE to properly prioritize work, they would need "systematic and justifiable criteria for site stabilization."[19] For that to be achieved, USACE would need to analyze more borings due to a "high degree of variability in the bed materials."[20] USACE's experts recommended analyzing more borings "to assure continuity of various layers," and they warned USACE that "interpretations made of connecting the dots between borings could be erroneous."[21] Analyzing core borings could avoid needless devastation by accounting for "the horizontal and vertical location of the scour resistant clay" for project designs.."[22] **Instead of following their expert panel recommendations to analyze borings from erosion resistant places along the American River Parkway, USACE instead resorts to overgeneralized data to justify a one-size-fits-all approach to erosion protection.** USACE relied on 2 borehole samples to estimate erosion risk on the Lower American River, none upstream of Howe Avenue Bridge where USACE proposes to bulldoze 522 trees as part of American River Erosion Contract 3B South.[23] The use of a borehole sample near Howe Avenue Bridge to justify work two miles upstream is especially egregious because the Erosion Protection Report indicates that the banks upstream of Howe Avenue consist of fundamentally different bed materials than the banks downstream of Howe Avenue. According to the Erosion Protection Report, the area between river mile 6.6-7.5 contains "broader areas of scour where the formation is likely more widely exposed in the channel bed or lies concealed beneath a thin cover of active channel only a few feet thick."[24] This unit "contains no bank resistance to lateral erosion and will not contribute to levee stability."[25] This is, in other words, an area with highly erodible bed materials. Thus, installing launchable rock toes or trenches at this location may be justifiable. However, the area upstream of Howe Avenue, especially the area near the entrance of SARA Park where the Corps proposes to install a launchable rock trench and launchable rock toe, contains significant amounts of erosion-resistant clay hardpan, which the technical documents refer to as the "Pleistocene Fair Oaks Formation."[26] The only modeling results USACE provides for the area containing Pleistocene Fair Oaks Formation, between RM 7 and RM 11, indicate that "for all the flows simulated the sheer stress in the reach with locally exposed hard material is below the critical stress for erosion of moderately resistant material

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[19] American River Watershed Common Features General Reevaluation Report, Attachment E, Erosion Protection Report, 15.
[20] Ibid, 17.
[21] Ibid.
[22] Ibid, 15.
[23] American River Watershed Common Features General Reevaluation Report, Attachment C - Geotechnical Report, p. 18.
[24] American River Watershed Common Features General Reevaluation Report, Attachment E, Erosion Protection Report, 32.
[25] Ibid.
[26] American River Watershed Common Features General Reevaluation Report, Attachment C - Geotechnical Report, 25, 38. American River Watershed Common Features General Reevaluation Report, Attachment E, Erosion Protection Report, 12, 31, 32.

(clay and cemented sand with silt)." **Therefore, significant scour below this erosion resistant material/surface is not anticipated."**[27]

Proposing destructive launchable rock riprap for Contract 3B after failing to follow their expert recommendations is inconsistent with the laws which aim to protect the environment in general and the Lower American River in particular. The American Parkway Plan requires designing erosion projects "to minimize damage to riparian vegetation and wildlife habitat."[28] "Minimizing damage" would also entail avoiding unnecessary work. Without carefully accounting for the erosion resistant areas of the LAR, USACE is proposing unnecessary erosion measures and therefore failing to minimize damage to the environment. CEQA makes it "a duty for public agencies to avoid or minimize environmental damage where feasible."[29] According to the California Supreme Court, CEQA was intended to be interpreted in such a manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.[30] It is not unreasonable for a lead agency to carefully determine where they can avoid environmentally destructive measures, especially when such determinations can be made by well-established methods recommended by that agency's own consulted experts. Likewise, according to CEQ, NEPA "was enacted to promote efforts that will prevent or eliminate damage to the human environment."[31] Thus, the failure to follow through with the recommendations within its own technical reports is inconsistent with the National Environmental Policy Act, which also requires agencies to undertake new scientific or technical research when it "is essential to a reasoned choice among alternatives."[32] How could USACE make a "reasoned choice among alternatives," including an alternative of taking no action, when it has ignored the recommendations within its own technical reports to analyze more boring samples from the LAR? Boring samples help evaluate the durability of riverbank segments. Clearly distinguishing between problem spots and durable spots would enable USACE to devise more targeted approaches for erosion work and avoid mass deforestation and devegetation caused by long stretches of launchable rock trenches and launchable rock toes.

7

To determine risk of levee failure for each segment of the LAR, USACE contracted with HDR Ford Engineers, who elicited expert opinions to estimate probabilities of levee failure.[33] The expert opinions do not support USACE's one-size-fits all launchable rock measures. USACE incorporates by reference the "Lower American River - Subreach 1, 3, and 4" technical memo but not the more expansive document from which the memo is based, "Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4."[34] This is a regrettable

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[27] American River Watershed Common Features General Reevaluation Report, Attachment E, Erosion Protection Report, 24.
[28] *Sacramento County American River Parkway Plan 2008*, Section 4.16, p. 85.
[29] CEQA, 15021(a).
[30] Friends of Mammoth v. Board of Supervisors, 8 Cal. 3d 247.
[31] Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011.
[32] National Environmental Policy Act, Sec. 106(b)(3)(B).
[33] HDR David Ford Consulting Engineers, "Lower American River - Subreach 1, 3, and 4 Tier Classification," Technical Memo - Nov. 13, 2019.
[34] 2023 ARCF Draft SEIS/SEIR, 10-1.

decision considering the latter document contains the full range of expert opinions for tier classification, including what they see as favorable conditions. By contrast, the technical memo only pulls opinions on the adverse conditions for tier 1 segments. For the highest risk tier 1 segments, the technical memo almost completely excludes expert views on favorable conditions. Not including the document with the full range of expert opinions on both adverse and favorable conditions creates the illusion that there is consensus for USACE's singular measure of launchable rock where none exists. Experts might have agreed on risk rating, although even this proposition is dubious. For left bank rm 9.8-10, one expert wrote "yikes" while another indicated he was a no-vote on intervention.[35] Likewise, despite its tier 1 classification risk, one expert noted that left bank rm 10.4-10.5 segment had a history of good performance.[36] CEQA does not require "technical perfection in an EIR, but rather adequacy, completeness, and a good faith effort at full disclosure."[37] CEQA also acknowledges that "disagreement among experts does not make an EIR inadequate."[38] However, it does require that the EIR "summarize the main points of disagreement among the experts."[39] **Neglecting to cite "Lower American River Erosion Conditional Risk Assessment," as well as neglecting to summarize the substantial points of disagreement, is a disservice to the public and to policy makers, who have not been given sufficient information to determine the adequacy of USACE's very limited proposals which do not include biotechnical and bioengineering alternatives.**

8

Experts notably lacked consensus about USACE's overly broad assertion that the banks all along the LAR are subject to high river velocities. Experts noted low velocities for several areas where USACE has proposed launchable rock features. For left bank river mile 9.8-10.0, where USACE proposes a launchable rock toe, one expert stated that water velocities were too low on levee at 160kcfs to cause serious damage.[40] For left bank rm 10.0-10.3, where USACE proposes two launchable rock toes and a launchable rock trench, two of the experts cited low velocities on levee and upper bank, with one stating that "water velocities low on levee face at 160k cfs."[41] For river mile 10.4-10.5, an expert stated that water velocities were low on the levee at 160kcfs.[42]

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Such observations are consistent with the velocity contour maps in the General Reevaluation Report.[43] These maps show that at 160kcfs, velocities along the banks of the LAR can range anywhere from 0-1ft/sec to 16ft/sec.

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[35] Ibid, E38.
[36] Ibid, E48.
[37] CEQA, 15003.
[38] CEQA, 15151.
[39] Ibid.
[40] Ibid, E-38.
[41] Ibid, E-46.
[42] Ibid.
[43] American River Watershed Common Features General Reevaluation Report, 2-21.

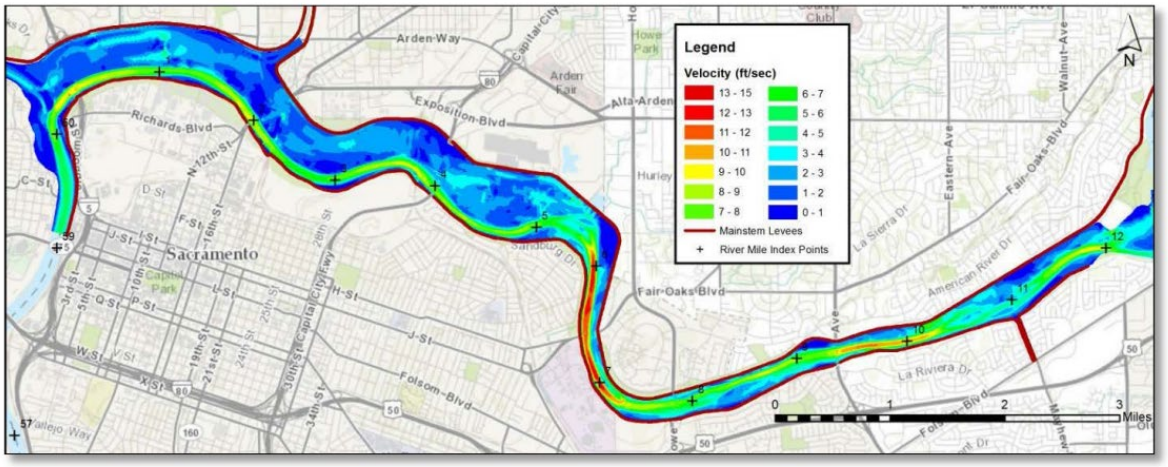

Figure 2-8: Velocities in the Lower American River at a discharge of 160,000 cfs

9

Between left bank river miles 10 and 11, which comprises most of Contract 3B South, estimated velocities along the banks during a 200 year, 160kcfs event range from 0-1ft/sec to 6-7ft/sec. At these velocities, there are many types of lining materials for erosion protection USACE could have considered, at least according to table 4-4 of the Erosion Protection Report. The permissible velocity for 6 inch gravel/cobble is 4-7.5 ft/sec, 6-8 ft/sec for class a turf vegetation, and some types of soil bioengineering can withstand up to 19 ft/sec.[44] Launchable rock riprap, in short, was most certainly not the only option USACE could have deployed. For left bank river mile 10.4-10.5, the consultants who put together the Lower American River Streambank Erosion Monitoring Report recommended “cobbles with vegetation or other biotechnical measures such as brush mattress, willow waddles or brush boxes (all supplemented with plantings).[45]

[44] American River Watershed Common Features General Reevaluation Report, Attachment E, Erosion Protection Report, 43.
[45] MBK Engineers, “2017 Lower American River Streambank Erosion Monitoring Report,” (April 2018), 12.

Table 4-4. Permissible shear and velocity for selected lining materials (Fischenich 2001)

Permissible Shear and Velocity for Selected Lining Materials[1]

Boundary Category	Boundary Type	Permissible Shear Stress (lb/sq ft)	Permissible Velocity (ft/sec)	Citation(s)
Soils	Fine colloidal sand	0.02 - 0.03	1.5	A
	Sandy loam (noncolloidal)	0.03 - 0.04	1.75	A
	Alluvial silt (noncolloidal)	0.045 - 0.05	2	A
	Silty loam (noncolloidal)	0.045 - 0.05	1.75 – 2.25	A
	Firm loam	0.075	2.5	A
	Fine gravels	0.075	2.5	A
	Stiff clay	0.26	3 – 4.5	A, F
	Alluvial silt (colloidal)	0.26	3.75	A
	Graded loam to cobbles	0.38	3.75	A
	Graded silts to cobbles	0.43	4	A
	Shales and hardpan	0.67	6	A
Gravel/Cobble	1-in.	0.33	2.5 – 5	A
	2-in.	0.67	3 – 6	A
	6-in.	2.0	4 – 7.5	A
	12-in.	4.0	5.5 – 12	A
Vegetation	Class A turf	3.7	6 – 8	E, N
	Class B turf	2.1	4 - 7	E, N
	Class C turf	1.0	3.5	E, N
	Long native grasses	1.2 – 1.7	4 – 6	G, H, L, N
	Short native and bunch grass	0.7 - 0.95	3 – 4	G, H, L, N
	Reed plantings	0.1-0.6	N/A	E, N
	Hardwood tree plantings	0.41-2.5	N/A	E, N
Temporary Degradable RECPs	Jute net	0.45	1 – 2.5	E, H, M
	Straw with net	1.5 – 1.65	1 – 3	E, H, M
	Coconut fiber with net	2.25	3 – 4	E, M
	Fiberglass roving	2.00	2.5 – 7	E, H, M
Non-Degradable RECPs	Unvegetated	3.00	5 – 7	E, G, M
	Partially established	4.0-6.0	7.5 – 15	E, G, M
	Fully vegetated	8.00	8 – 21	F, L, M
Riprap	6 – in. d_{50}	2.5	5 – 10	H
	9 – in. d_{50}	3.8	7 – 11	H
	12 – in. d_{50}	5.1	10 – 13	H
	18 – in. d_{50}	7.6	12 – 16	H
	24 – in. d_{50}	10.1	14 – 18	E
Soil Bioengineering	Wattles	0.2 – 1.0	3	C, I, J, N
	Reed fascine	0.6-1.25	5	E
	Coir roll	3 - 5	8	E, M, N
	Vegetated coir mat	4 - 8	9.5	E, M, N
	Live brush mattress (initial)	0.4 – 4.1	4	B, E, I
	Live brush mattress (grown)	3.90-8.2	12	B, C, E, I, N
	Brush layering (initial/grown)	0.4 – 6.25	12	E, I, N
	Live fascine	1.25-3.10	6 – 8	C, E, I, J
	Live willow stakes	2.10-3.10	3 – 10	E, N, O
Hard Surfacing	Gabions	10	14 – 19	D
	Concrete	12.5	>18	H

[1] Ranges of values generally reflect multiple sources of data or different testing conditions.

A. Chang, H.H. (1988).
B. Florineth. (1982)
C. Gerstgraser, C. (1998).
D. Goff, K. (1999).
E. Gray, D.H., and Sotir, R.B. (1996).
F. Julien, P.Y. (1995).
G. Kouwen, N.; Li, R. M.; and Simons, D.B., (1980).
H. Norman, J. N. (1975).
I. Schiechtl, H. M. and R. Stern. (1996).
J. Schoklitsch, A. (1937).
K. Sprague, C.J. (1999).
L. Temple, D.M. (1980).
M. TXDOT (1999)
N. Data from Author (2001)
O. USACE (1997).

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10 Considering that experts cited low velocities at 160kcfs between river miles 9.8 and 10.5 on the left bank of the LAR, and with confirmation from the GRR's velocity contour maps, USACE could have explored biotechnical alternatives. For left bank river mile 10.4-10.5, one expert observed that a favorable condition was "dense veg/root mats" that cover much of the bank, as well as a fully grass levee and a dense shrub mass at the top of the bank that attenuates

velocity and wind wave.[46] Yet another expert highlighted "good past performance" and "vegetation on berm" as a favorable condition for this segment.[47] Some experts expressed concern over encroachment, sill degradation, and bed lowering.[48] But given that velocities in this area are low and vegetation protects the bank, USACE could have explored alternatives that aim to increase sediment recruitment in these segments. One example of this being done in a "high energy river environment" was on the Middle Green River in Washington, where, instead of hard armoring, King County built a bioengineered bank stabilization project by using logs at the river's toe secured to the bank with coir fabric, soil wraps, and vegetation, adding roughness and recruiting sediment. One of the project designers emphasized that "this type of technique is what I would advocate even in a high energy environment."[49] USACE could also explore techniques that preserve, enhance, and augment on-site vegetation instead of completing removing all vegetation. For left bank river miles 9.8-10, 10.0-10.3, and 10.4-10.5, experts noted the presence of vegetation as a favorable condition. However, they also warned that if erosion took bank vegetation, the risk of levee failure could increase.[50] Since experts recognized the importance of vegetation for levee stability, bioengineering methods should be feasible for many of the areas where USACE now proposes launchable rock features.

11

Much is at risk if USACE neglects to explore bioengineering alternatives, including public safety. **Research going back nearly a century indicates that riparian forests play a vital role in bank stability and flood control.** Over 95 years ago an engineer observed that during the catastrophic flood of 1927, levees only seemed to fail where trees had been removed:

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> It was interesting to inspect various sections of the big flood. Wherever a heavy stand of native willows or other forest trees were growing in the burrow pit and on the land between the river the erosion from wave action and current was very slight and on miles of levee where tree growth existed no injury was caused whatsoever. **On the contrary, where land was cleared and there were no obstructions to break the waves, injury and destruction were evident along the entire distance.**[51]

Likewise, studies of the catastrophic 1993 Missouri Flood found that where riparian forest was less than 300 feet wide, levee failure was 74-88% more likely.[52] Trees also play a special role in

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[46] HDR David Ford Consulting Engineers, Memorandum: Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4," (July 25, 2019), E48.
[47] Ibid.
[48] Ibid.
[49] FEMA, *Engineering with Nature: Alternative Techniques to Riprap Bank Stabilization*, 11-12.
[50] HDR David Ford Consulting Engineers, Memorandum: Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4," (July 25, 2019), E46.
[51] O.S. Scheifele, 1928. "Protection of River Banks and Levees." *The Canadian Engineer*: 123.
[52] J.P. Dwyer and D.R. Larsen, 1997. "Value of Woody River Corridors in Levee Protection Along the Missouri River in 1993." *Journal of the American Water Resources Association*. https://www.researchgate.net/publication/230348698_Value_of_Woody_River_Corridors_in_Levee_Protection_Along_the_Missouri_River_in_1993. Stephen B. Allen, John P. Dwyer, Douglas C. Wallace, and Elizabeth A. Cook, 2023. "Missouri River Flood of 1993: Role of Woody Corridor Width in Levee Protection." *Journal of the American Water Resources Association*. https://onlinelibrary.wiley.com/doi/epdf/10.1111/j.1752-1688.2003.tb04416.x

armoring banks from erosion. According to Rood et al (2014) mature riparian trees are highly effective at preventing erosion, even superior to grass, and they recommend that "riparian forests should be conserved to provide bank stability and to maintain an equilibrium of river and floodplain dynamics."[53] Besides armoring banks, trees make armor less necessary by redirecting the energy of rivers from the banks towards the center of the channel. Such phenomenon was observed almost a century ago. As a 1920s engineer remarked, "experience has shown that where a clump of trees were allowed to spring up on the river face of levees eddies were caused and erosion started down stream from trees."[54] More recent modeling has confirmed old observations. When Johannes DeVries applied vegetation models specifically for the dimensions of the Sacramento River, looking at areas with and without vegetation on levees, he found that reducing vegetation or dense vegetation next to levees generally increased the velocity of water, and therefore, the potential for scour.[55] More pertinently, an academic team working with the California Department of Transportation incorporated vegetation into a high-fidelity model to account for trees in large-eddy simulations of the Lower American River. Their modeling found that trees had "a significant impact on the computed flow field by diverting the high-velocity core of the flood away from the banks toward the center of the channel."[56] Results showed that "velocities in the center of the river increased by approximately 50%" and "were nearly damped out entirely along the banks."[57] For the case without vegetation, the flow was "distributed throughout the full river width, with high velocities near the banks."[58]

[53] Rood, S. B., Bigelow, S. G., Polzin, M. L., Gill, K. M., and Coburn, C. A. (2015). Biological bank protection: trees are more effective than grasses at resisting erosion from major river floods. *Ecohydrol.*, 8: 772–779. Doi: 10.1002/eco.1544.

[54] O.S. Scheifele, 1928. "Protection of River Banks and Levees." *The Canadian Engineer*: 122.

[55] Johannes DeVries, Vegetation Effects on River Hydraulics, Floodway Conveyance & Velocity Response, SACRAMENTO AREA FLOOD CONTROL AGENCY (Aug. 28, 2007).

[56] Kevin Flora, Christian Santoni, and Ali Khosronejad. 2021. "Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River Under Flood Conditions." *Journal of Hydraulic Engineering*: 05021006-8. https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912.

[57] Ibid, 05021006-12.

[58] Ibid, 05021006-8.

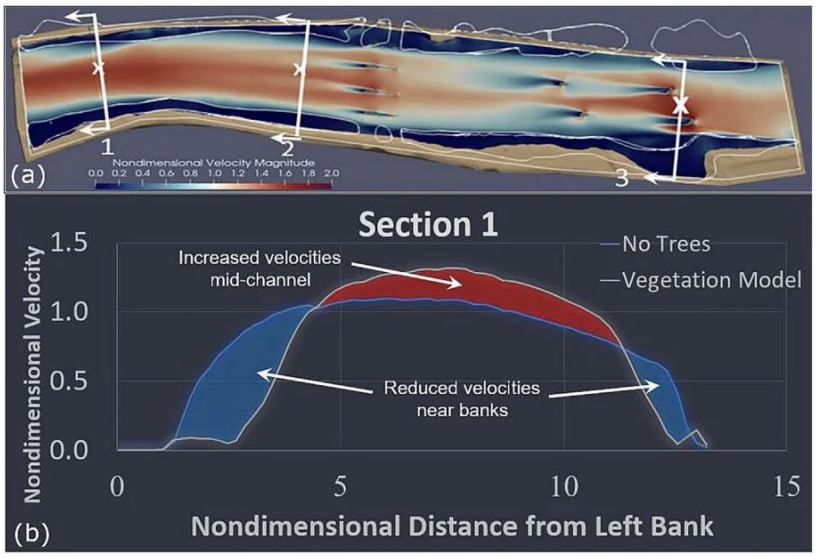

FIGURE 7 Cross-sections were compared along three locations of the American River (a). At Section 1-1, the vegetation model significantly damped out flows along both banks (blue regions) and increased velocities in the centre of the channel (red region) compared to LES without trees (b).

Anecdotally, residents have provided pictures of the 2017 80kcfs high waters, where waters along the banks of river mile 10.4-10.5 were so stagnant that dogs could wade in them.

14

By contrast, USACE is limiting their proposals based on the 2-D hydraulic model developed in the 2004 Ayres Report, "Lower American River —Erosion Susceptibility Analysis for Infrequent Flood Events."[59] This 2-D hydraulic model almost certainly overestimates velocities along banks with large vegetation. As the academic team which worked with Caltrans observed,

> Incorporating vegetation into high-fidelity computational models is imperative for obtaining accurate modeling results. In this study, when trees were accounted for in large-eddy simulations, a drastic effect on redistributing the high-velocity away flow away from the banks and increasing its magnitude near the center of the American River was observed.[60]

Removing 685 trees along the lower american river risks making erosion much worse for years to come by allow river flows to crash against the banks during high water events. **Therefore, USACE risks making us less safe with mass tree removal in the Contract 3B area.**

Even though USACE obtained approval for the 2016 Record of Decision, they still should have explored a full range of alternative measures in the 2023 Draft SEIS/SEIR. CEQ urges agencies to carefully reexamine EIS's when a proposal has not been implemented within five years of the Record of Decision in order to take into account new "information relevant to environmental concerns and bearing on the proposed action or its impacts."[61] As already outlined, **in the 7.5 years since the Chief of Engineers issued his 2016 ROD, new Caltrans commissioned research has shown that river velocities along the banks of the Lower American River are significantly lower where there is mature vegetation than what had been previously indicated by the older model USACE relies upon. Considering that USACE ruled out alternative measures because of high river velocities, it is critical for them to now consider this more recent research.** Furthermore, the requirement to identify the least environmentally destructive approach applies whenever a public review process is initiated. As CEQ makes clear, the purpose of the review process is for the public and other agencies to assist the lead agency in developing and determining environmentally preferable alternatives.[62] If an alternative is identified in public comments that is not unreasonable, CEQ requires lead agencies to issue a new SEIS to explore that alternative.[63] Finally, USACE assured citizens concerned about their overly broad, one-size-fits all proposals in the 2016 EIS/EIR that before initiating work on individual contracts and project segments, they would explore a fuller range of alternatives. As USACE wrote to Matthew Carr, after analyzing individual segments of the LAR, "if some sort of bank protection is determined to be necessary, other options to reduce impacts,

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[59] American River Watershed Common Features General Reevaluation Report, Appendix, 47.
[60] Kevin Flora, Christian Santoni, and Ali Khosronejad. 2021. "Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River Under Flood Conditions." *Journal of Hydraulic Engineering*: 05021006-12. https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912.
[61] Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).
[62] Ibid.
[63] Ibid.

including bioengineering measures, will be analyzed."[64] Not only did USACE break its promise to analyze bioengineering measures in supplemental EIS/EIR's, but when the EPA suggested in the 2022 Public Scoping comments that USACE offer bioengineering alternatives in the 2023 SEIS/SEIR, USACE dismissively responded that it had already explored alternatives measures in the 2016 GRR.[65] USACE should heed the EPA's suggestions. If USACE installs launchable rock toes and trenches where alternatives measures were feasible, it not only risks public safety, but it could also irreparably damage precious resources of the American River Parkway.

One of the endangered precious resources of the American River Parkway is heritage oak trees. CEQA states that "knowledge of the regional setting is critical to the assessment of environmental impacts."[66] Thus, "**special emphasis should be placed on environmental resources that are rare or unique to that region and would be affected by the project."**[67] **Heritage Oaks constitutes such a rare and special resource for Sacramento County, so much so that their protection is enshrined in law.** The Sacramento County Code defines a "heritage tree" as a "California oak tree growing on any land in Sacramento County, including privately owned land, with a trunk sixty inches or greater in girth measured four and one-half feet above the ground."[68] The Sacramento County Tree Ordinance declares that "in order to promote the health, safety, and enhance the beauty and general welfare of Sacramento County," it shall be the policy of the County "to provide for the special protection of heritage and landmark trees within the unincorporated area of the County."[69] Contract 3B South is contained entirely within the unincorporated area of Sacramento County. The 2023 ARCF SEIS/SEIR lists the Sacramento County Tree Ordinance as one of the state and local plans which govern activities within this project area.[70] There is no other mention of the Sacramento County Tree Ordinance in the 2023 SEIS/SEIR, even though USACE's proposal to remove hundreds of trees in the Contract 3B Area is inconsistent with the goals and purpose of Sacramento County's tree code. **Considering that some of the heritage trees in the area of Contract 3B South are over 250 years old, their removal would constitute an essentially "unmitigable" impact on the visual and aesthetic resources of the Parkway.**

16

Given that the Sacramento County Tree Ordinance affords special protection to heritage trees within the unincorporated area of Sacramento County, dozens of which are found in the Contract 3B South area, one would expect the SEIS/SEIR to address potential impacts that pertain specifically within the unincorporated area of Sacramento County. There is no distinction in this SEIS/SEIR made between the impacts on heritage trees in unincorporated Sacramento County and in the city of Sacramento, which does not provide for the same level of protection to heritage trees. The environmental impacts of Contract 3B North, which is located in Sacramento

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[64] Letter to Matthew Carr from Josephine R. Axt, May 24, 2016, in ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement. P. 1.
[65] 2023 ARCF Draft SEIS/SEIR, Appendix A. Nepa Scoping Materials, Appendix D. Response to Comment Number 15-1.
[66] CEQA, 15124(c).
[67] Ibid.
[68] Sacramento County, California County Code, Chapter 19.04.030.
[69] Ibid, Chapter 19.04.010.
[70] 2023 ARCF Draft SEIS/SEIR, 1-7.

City, and Contract 3B South, which is located in unincorporated Sacramento County, are treated together. This is an inadequate level of environmental analysis that fails to account for how different areas within the project study protect and regard their environmental resources.

The actual discussion of what proportion of heritage trees will be impacted in this project is also incomplete. In the entire SEIS/SEIR, heritage trees are only mentioned on 9 pages.[71] On some of those pages those mentions are only incidental. As for Contract 3B South specifically, where heritage trees enjoy special protection, the heritage oaks are mentioned on two pages. The first mention, on page 3-5, is that one alternative was dismissed as "it would have required removal of heritage oaks."[72] The second mention is on page 3.1-23, where it states that "a buffer of heritage oaks would be kept in place near both Oak Meadow Park and Larchmont Park, so the viewshed of trees from those parks would be not be affected."[73] The language of the first mention of heritage oaks for the Contract 3B South area implies USACE has designed the project to avoid removing any heritage oaks. But the language of the second mention implies USACE is only keeping heritage oaks in select areas, such as in front of parks, in order to preserve their "viewshed." If USACE was not removing heritage oaks in other areas of the project footprint, why would USACE mention keeping a buffer of heritage oaks near Larchmont Park?

In general, the SEIS/SEIR is incredibly vague, inadequate, and incomplete in communicating to the public the impacts they could expect to heritage trees, which constitute an important visual resource in these project areas. The SEIS/SEIR mentions selecting designs to "minimize impacts to heritage oaks" or to "reduce impacts to heritage oaks" or making refinements that would "substantially reduce or avoid several of the significant impacts" to "riparian vegetation, and loss of heritage oaks."[74] But does this language of reduction, minimization, and avoidance really convey anything coherent to concerned citizens? Would the end result match anything of their expectations based on USACE's language? Let's use American River Contract 2 to explore the consistency between USACE's language and what the public might expect. In the SEIS/SEIR for American River Contract 2, USACE stated it would "minimize the removal of existing riparian vegetation" and that "impacts to forested wetlands will be minimized to the greatest extent feasible."[75] The following picture shows some of the work USACE did on American River Contract 2. The picture was taken from the Guy West Bridge facing the right bank looking left.

[71] Ibid, 3-4, 3-5, 3-42, 3-107, 4-144, 3. 1-3, 3.1-23, 3.1-25, 4.1-40.
[72] Ibid, 3-5.
[73] Ibid, 3.1-23.
[74] Ibid, 3-5, 3-107.
[75] American River Contract 2 Final SEIS/SEIR - September 2021, 3-97, 5-7.

Based on the little information USACE provides to the public, I cannot determine whether or not USACE could have saved at least one tree in this project section. What I can say is that if

somebody told me they were going to minimize forest tree removal, and in the end no trees remained, I would feel like I had been bamboozled. USACE's language may or may not be technically accurate, but it conveys nothing of the actual impacts. **If no trees will remain in a segment, USACE should state that. If only a few trees will remain in a section after construction, USACE should state that**. Likewise, if most of the trees will remain, USACE should state that. But "minimizing vegetation loss" tells the public nothing about how much forest will actually be lost and how much the visual resources of the Parkway will actually be impacted.

USACE should consider that, in the words of the California Supreme Court, an "EIR is intended to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of its action."[76] USACE's vague and contradictory language as regards heritage trees does not demonstrate more than a perfunctory consideration of the ecological implications of its measures for heritage trees, especially considering concerns about riparian removal were raised for the 2016 EIS/EIR. In a letter dated February 22, 2016, a concerned citizen lamented that it would not be possible to evaluate the effectiveness of USACE's mitigation for cutting down forest "without knowing what sections of forest will be cut and what sections will be replaced on the same site versus replaced nearby versus replaced on a distant site. In short, the Corps is saying, 'trust us to do the right thing.'"[77] With so little detail on heritage oaks, USACE is still asking the public to trust it to do the right thing.

USACE certainly could give the public a more clear indication in the SEIR/SEIS of how many trees they will remove, and what type of trees they will remove, and which segments of the LAR will suffer the most tree removal. At the December 12, 2023 public presentation for the Lower American River Task Force, USACE told the public that at 65% design 719 trees were going to be removed and at 95% designs that number was 522.[78]

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[76] People ex rel. Department of Public Works v. Bosio, 47 Cal. App. 3d 495.
[77] Letter from Matthew Carr, Graham Brownstein, et al, in ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement.
[78] Lower American River Task Force, December 12, 2023. https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf.

LAR C3B SOUTH, SITE 4-1
HABITAT IMPACT FOOTPRINT CHANGES

U.S. ARMY

Site 4-1	VELB		YBCU (Riparian)			NMFS (Salmonid)			Tree
Species	**Impact (acres)**	**Mitigation Offsite (3:1)**	**Impact (acres)**	**Mitigation Onsite (acres)**	**Mitigation Offsite (2:1)**	**Impact (acres)**	**Mitigation Onsite (acres)**	**Additional Mitigation Needed (2:1)**	**Number of Trees Removed**
35% Designs	13.58	40.74	6.48	14.13	(1.17)	7.55	3.1	12	Not calculated
65% Designs	7.29	21.87	5.61	11.2	0	9.96	4.3	15.17	719
95%* Designs	6.44	19.32	3.97	15.31	7.94	8.21	TBD	TBD	522

*Impacts for the 95% designs were calculated using construction limits and tree demo footprints from the PDT review design set in September 2023. These impact calculations do not reflect the most up to date designs.

USACE could not provide this information to the public unless they knew either exactly every tree they were going to cut down, or at least mapped out all the areas in the project footprint and estimated the relative density of trees in each segment. Notably, however, this information was not provided in the actual Draft SEIS/SEIR. USACE could either provide the public with a tree inventory map, or a map which indicates through a color-coded intensity key what minimum proportion of trees could be expected to be removed in each segment. No such map exists in the SEIS/SEIR, although USACE was able to provide a tree inventory map upon request in September of 2023 that marked every tree in the contract 3b area along with their size.

USACE does provide a chart showing the total number of riparian forest/scrub removed, but USACE gives no indication of what proportion of heritage oaks they will cut down, where they will cut down these heritage oaks, and the makeup of the 685 trees they are planning to cut down.[79] To reiterate, the loss of heritage oaks, some of which are older than this country, is essentially unmitigable.

Table 4.1-2: Existing Habitats and Land Cover Types (acres)

Item	American River Erosion Contract 3B and 4B	American River Erosion Contract 4A	ARMS	Sacramento River Erosion Contract 3	SRMS	MCP
Vernal Pools	-	-	-	-	-	0.22
Riparian Forest/Scrub	51.32	65.23	14.53	5.04	46.37	-
Oak Woodland	-	-	-	-	45.0	2.60
Rural Herbaceous/ Grassland	71.18	99.51	44.9	1.31	2.80	37.43
Wetlands	-	18.95	2.5	-	47.34	2.4
Riverine/Open Water	12.07	4.02	55.4	20.7	-	-
Agricultural	-	-	-	-	7.67	13.02
TOTAL	134.57	187.71	99.74	27.05	149.18	55.67

AR C3B – Riparian Forest/Scrub composed of Native and Nonnative scrub and woodland. LAR C4A – Riparian Forest/Scrub composed of Native and nonnative scrub and woodland. ARMS - Riparian Forest/Scrub and Oak Woodland is composed of Native and nonnative scrub and woodland. SRE C3 – Riparian Forest/Scrub is composed of Fremont cottonwood forest, sandbar willow thicket, and valley oak woodland. SRMS – Riparian Forest/Scrub is composed of Hardwood Woodland and Scrub. Totals are Estimates.

17 USACE also provides a low-quality image of the various habitats in the project footprint, but fails to distinguish with any detail the different habitats and much tree loss each segment will suffer.[80]

[79] 2023 ARCF Draft SEIS/SEIR Appendices, 4.1-13.
[80] Ibid, 4.1-2.

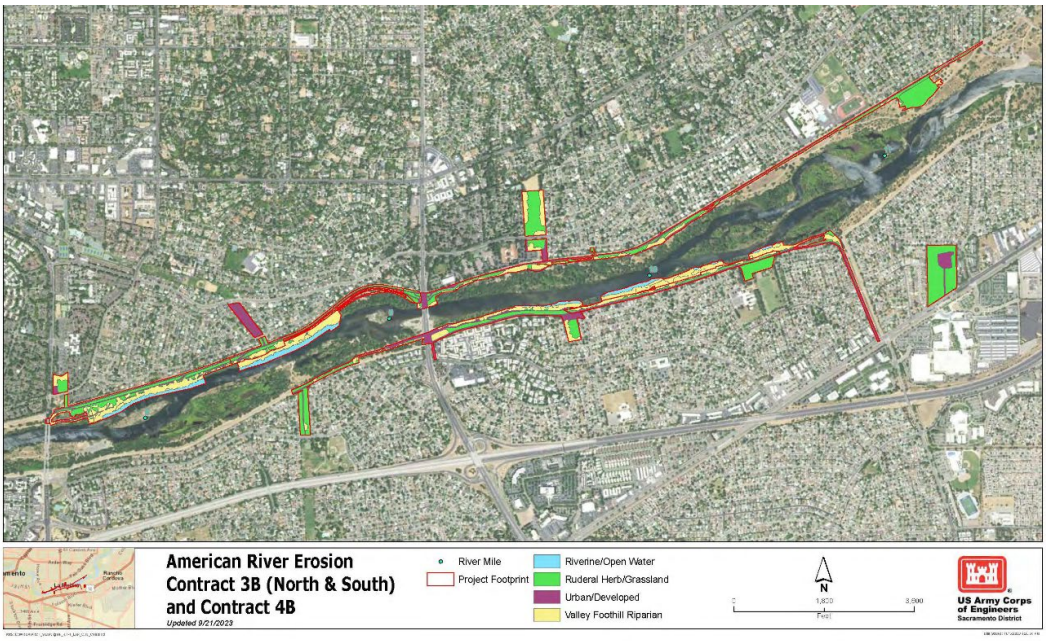


Figure 4.1-1. American River Erosion Contract 3B and 4B Land Cover Types

18

In addition to the low-quality image of the various habitats in the project footprint, USACE provides a vague and confusing map of "project impacts."[81] The project impacts maps identifies three kinds of areas within the project footprint: construction access, construction buffer, and staging. What each of these terms precisely mean is left up to the public to interpret. Contrary to standard practice, USACE does not define these terms in the SEIS/SEIR. An apprehensive citizen could reasonably surmise that construction access refers to where construction equipment will be moving and construction buffer to the areas where construction will actually occur. Yet consider the project impact for Contract 3B.

[81] 2023 ARCF Draft SEIS/SEIR, 3-30.

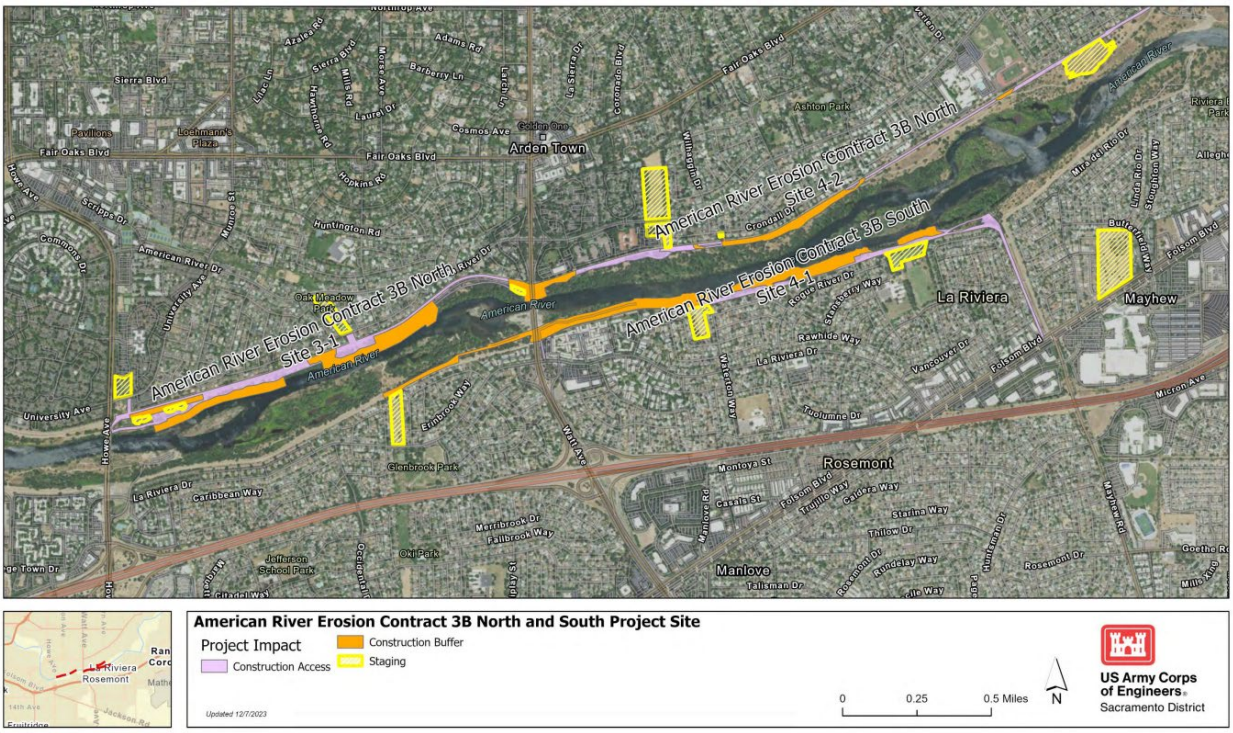


Figure 3.5.2-3. American River Erosion Contract 3B Project Footprint

On the south bank (contract 3b south) all the bank protection and launchable rock measures are proposed for the area between Larchmont Community Park and the Watt Bridge. However, there are staging areas to the west of the project area at Glenbrook Park Access and to the east of the Project area at a private parcel. The area between Larchmont Community Park and the Mayhew Canal is colored purple, indicating “construction access.” This makes sense. Though no construction is scheduled between Larchmont Park and the Mayhew Canal, trucks may have to use the canal and the levee leading to Larchmont Park to transport materials to and from the staging area along Folsom Blvd.

As with the area between Larchmont Park and Mayhew Canal, the area between Watt Bridge and Glenbrook River Access is not slated for erosion protection measures, but trucks will need to use this area to transport materials in and out of the project area. Unlike the area between Larchmont Park and Mayhew Canal, the area between Watt and Glenbrook River Access is colored orange, indicating it is a “construction buffer” zone.

What is an apprehensive citizen supposed to make of these differences? Why is the non-project area between Watt and Glenbrook River Access labeled a construction buffer zone while the non-project area between the Mayhew Drain and Larchmont Park is labeled a construction access zone? Does this mean that either people living in Glenbrook or people living near Larchmont will lack walkable access to the river for two years? There is no effort on USACE’s part to clearly communicate what this graphs and what implications it will have for residents near the Contract 3B South footprint.

19 The practice of providing very low-detail, zoomed out maps of the entire project area notably contrasts with the habitat maps USACE provided for previous Draft SEIS/SEIR’s, such as American River Contract 2, which provided not only section by section habitat maps, but identified 13 types of habitat, compared to only 4 for the 2023 Draft SEIS/SEIR. Furthermore, the habitat maps for in American River Contract 2 SEIS/SEIR Appendices identified various types of woodland, including oak woodland, which the map for the 2023 Draft SEIS/SEIR does

not do.[82] At the very least, USACE is capable of marking out the areas of the Contract 3B segments which have oak trees.

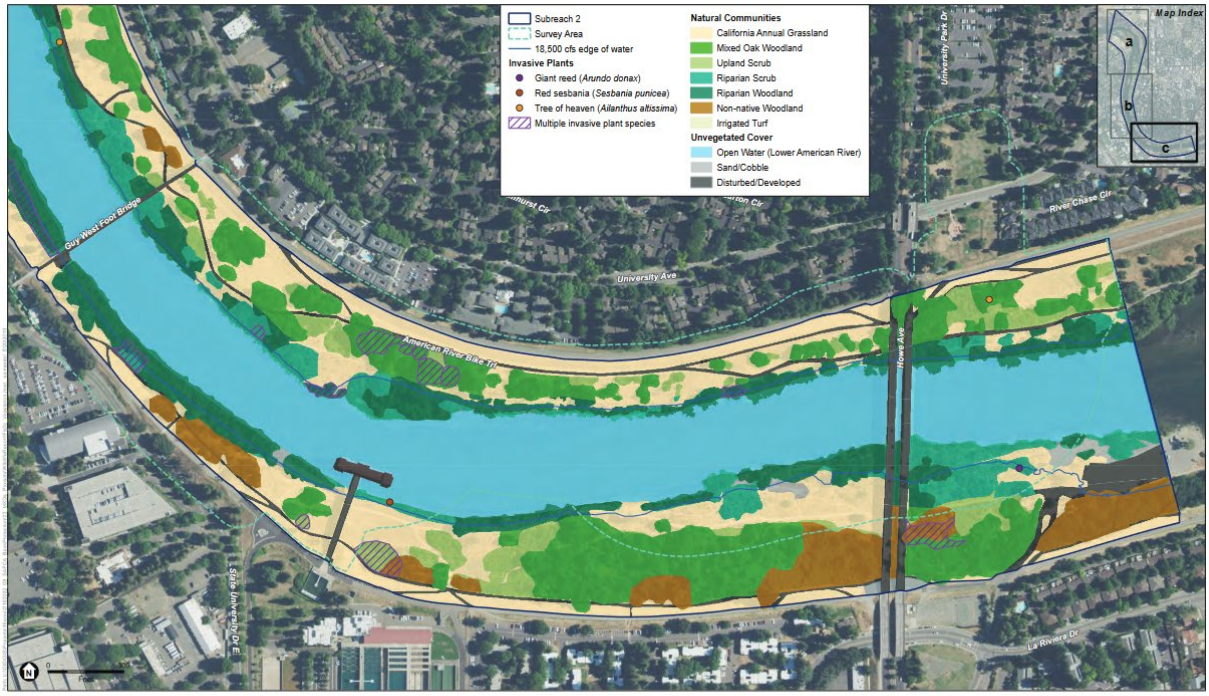
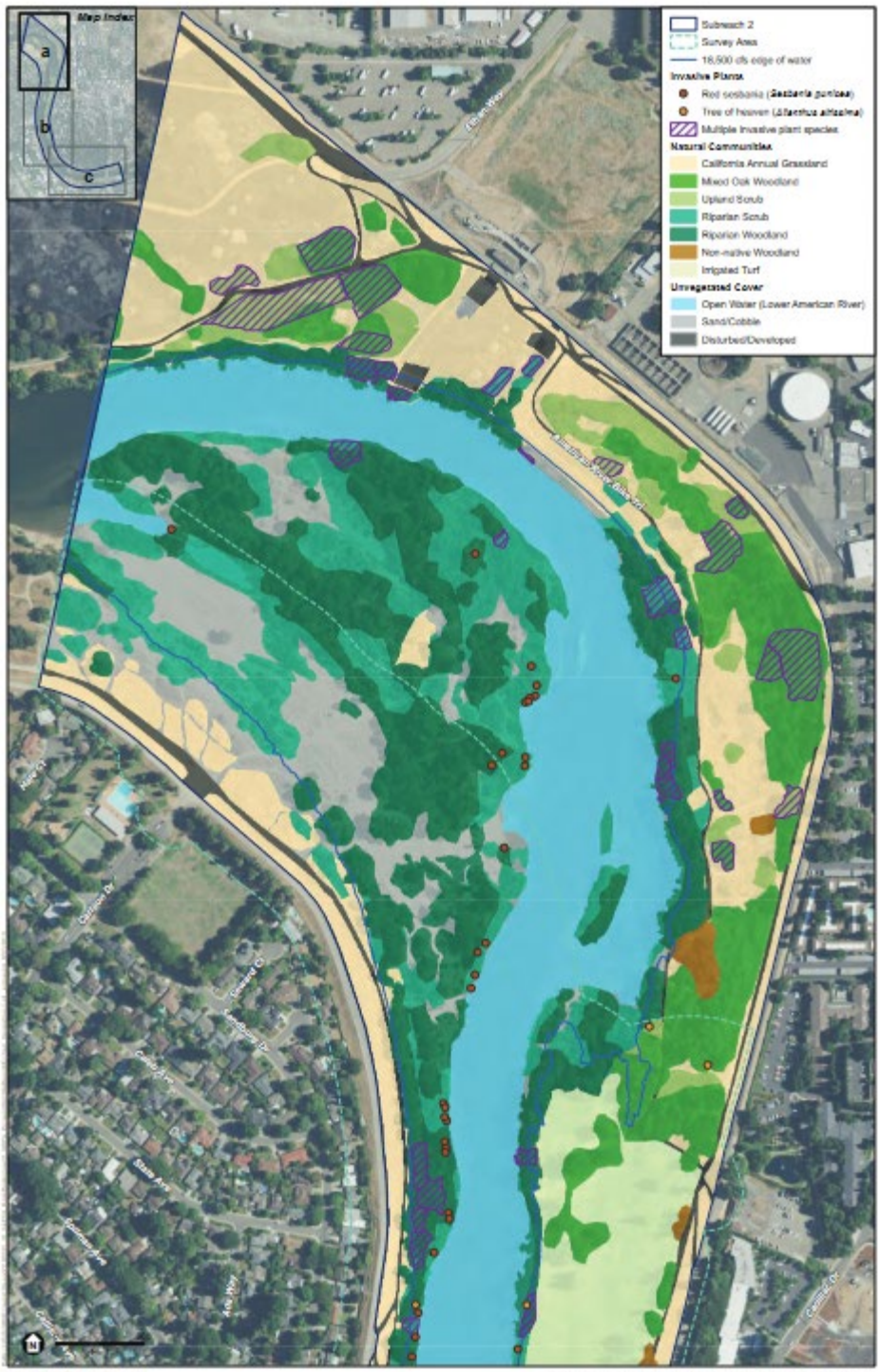


Figure 3c
Natural Communities of the
Lower American River Subreach 2

[82] American River Contract 2 Draft SEIS/SEIR, Appendix B. Wildlife Habitat Survey Reports for Subreaches 1, 2, 3, and 4, Including Arden Pond and for Rossmoor East and West, Figure 3A, Figure 3B, Figure 3c.



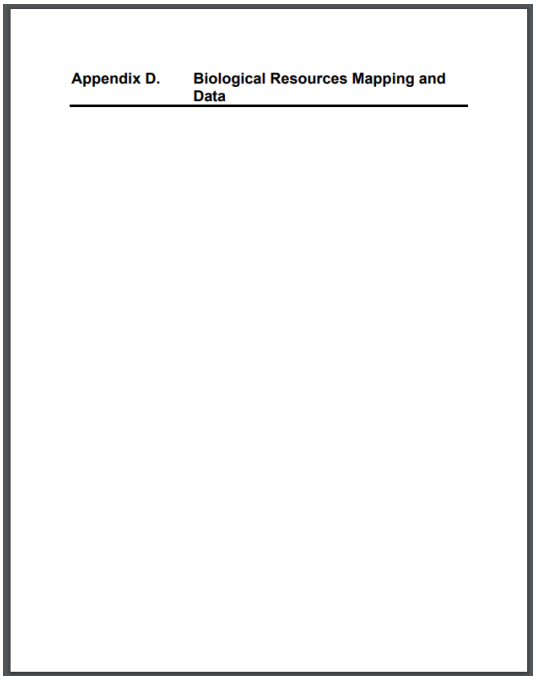
SOURCE: NHC, 2016; ESA, 2016

American River Common Features 2016 Project American River Contract 1

Figure 3a
Natural Communities of the
Lower American River Subreach 2

ESA

Here is the visual USACE has for biological resources mapping and data in Appendix D of the 2023 SEIS/SEIR.[83]


Appendix D. Biological Resources Mapping and Data

USACE's claim that the loss of forest land is less than significant long-term with mitigation, which allows vegetation to "grow back and provide a natural visual character again," is unjustified.[84] **If heritage trees are part of the vegetation lost, then the visual character of the area will never be the same.** Furthermore, USACE's claim that project features which will remain even after construction completion, i.e. "the O&M ramps, tie backs, and vegetation free zone areas," will constitute an insignificant long-term impact on visual and aesthetic resources because they "are only a small portion of the project site for American River Erosion Contract 3B North and South" is also inadequate and incomplete.[85] It's like saying removing 2% of a person's body weight will be insignificant only to find out that the 2% comes from extracting the brain. Likewise, the "portion" of a project site is an inadequate measure of its impact on the visual and recreational resources of the Parkway. If a ramp, for example, goes through a 300 year old oak tree, that is a "substantial degradation to the existing visual character or quality of public views of the site." Again, it should be noted that USACE does not actually show in the Draft SEIS/SEIR where the O&M ramps and tiebacks will be. USACE needs to show where the access ramps will be and how they will in general avoid impacts to heritage oaks. Otherwise, it is impossible to determine whether or not the long-term impacts to the existing visual character and quality of this project area will be significant and long-term.

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[83] 2023 ARCF Draft SEIS/SEIR Appendices, Appendix D. Biological Resources Mapping and Data
[84] 2023 ARCF Draft SEIS/SEIR, 3.1-23.
[85] Ibid.

A Few of the Irreplaceable Heritage Oak Trees in the Contract 3B South Area

The loss of heritage oak trees would be unmitigable, but to mitigate the other significant impacts of habitat removal, USACE proposes, where feasible, to cover launchable stone with several feet of topsoil, then plant native trees such as cottonwoods, valley oaks, box elders, and alders.[86] However, the flawed design of the planting benches along with the limited period of performance monitoring calls into question whether they are an adequate mitigation measure for the potential long-term, significant impacts caused by Contract 3B's proposed erosion protection features.

When launchable stone launches, it is expected to take down the planting benches. According to the Geotechnical Report, the waterside berm next to a launchable trench is expected to erode, and "will eventually reach the launchable trench."[87] When this happens, the "soils surrounding the trench will allow for the riprap contained in the trench to 'launch' into the void created adjacent to the trench."[88] If the trench launches as expected, they will likely take down the planting benches with them. This concern was expressed by the National Marine Fisheries Service 2021 Biological Opinion for ARCF. They wrote that a launchable toe rock is "also designed to launch to protect the levee from scour."[89] "The launching of this type of stone," NMFS writes, "is likely to result in the loss of some of the mitigation planting bench" and to NMFS "the lack of durability of this mitigation is concerning."[90] Given that it could not "be accurately determined at what future time this planting bench will be damaged from launchable rock, the overall benefit of the mitigation becomes less certain."[91]

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To address this concern about the durability of planting benches, USACE has agreed to develop a vegetation management plan in coordination with USFWS and NMFS to "Ensure that native riparian plantings installed within the planting benches are protected, managed, monitored, and maintained for 8 years, not to exceed 10 years following installation."[92] According USACE's Tier Classification Memo, ARCF has a 50-year design.[93] Since erosion is cumulative, the likelihood that launchable features launch would only increase each subsequent year after the monitoring period ends, and thus would also increase the likelihood of damage to mitigation planting benches. **This increasing likelihood means that without a plan to monitor and protect the planting benches over the entire 50 year life of the project, USACE cannot reasonably claim that planting bench mitigation will make the long-term impact of this project in the area of Contract 3B "less than significant under CEQA."**[94]

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[86] Ibid, 4.1-46.
[87] American River Watershed Common Features General Reevaluation Report, Attachment C - Geotechnical Report, 17.
[88] Ibid.
[89] Current NMFS Biological Opinion - 12 May 2021: 80.
[90] Ibid.
[91] Ibid.
[92] ARCF Draft 2023 SEIS/SEIR, 3-66.
[93] HDR David Ford Consulting Engineers, "Lower American River - Subreach 1, 3, and 4 Tier Classification," Technical Memo - Nov. 13, 2019, 1.
[94] 2023 ARCF Draft SEIS/SEIR, 3.4-12

USACE has also inadequately addressed how erosion of the planting benches will nullify their effectiveness as long term mitigation. As USACE observed in the 2016 General Reevaluation Report Final Environmental Impact Statement/Report, “Both the Sacramento River and the American River are confined by levees and have very little sediment in the water. Additionally, on the American River, Folsom Dam blocks sedimentation from upstream sources. Therefore, the energy of the flow tends to erode riverbanks and levees.”[95] Contract 3b is not widening levees, nor is it increasing the amount of sediment flowing from Folsom Dam. Therefore, it can be expected that the same erosion processes which necessitated ARCF will operate even after the installation of launchable rock toes and trenches as well as planting benches. According to geologist Jeffrey Mount, “Thick, well-developed soils that have well-established vegetative covers tend to be more resistant to erosion.”[96] If the mature trees and thick vegetation which currently armor the banks of the American River in the Contract 3B area are insufficient to prevent erosion, then how can we expect planting benches made up of loose, newly laid soil held in place by immature trees with (for many years) weak roots to not erode away?

USACE’s answer to the problem of planting bench erosion are tiebacks, but even they can only state that tiebacks “limit the extent of erosion,” not prevent it altogether.[97] Natural banks have deep, layered soils amassed over millennia from fluvial overflow deposit.[98] Even as topsoils erode away, there is still room in the bed materials of natural levees for roots to expand into. In contrast, launchable stone creates an absolute floor. As the planting bench erodes away, the space for roots to grow gets shallower and shallower, until there is nowhere for the roots to go at all. Thus, an adequate mitigation measure based on planting benches would need to provide mechanism for the continual replenishment of the planting bench over the entire life-design of the project, 50 years. USACE provides no details in the 2023 SEIS/SEIR as to how deep the planting benches will, how fast they may erode under different flow conditions, and how they may be replenished.

In response to concerns about the possibility of launchable rock features damaging planting benches, USACE relies on an assumption of inevitable habitat degradation, but such an assumption is irrelevant in light of CEQA and NEPA requirements. In the public scoping comments for the 2023 Draft SEIS/SEIR, comment 8-3 raised concern over launchable features damaging planting benches. USACE’s response was that “in the case of catastrophic flood USACE expects the bank protection features to perform as flood control features, and without these features, habitat loss would most likely be greater than without these erosion protection features in place.”[99] There are a number of problems with this response. First, where USACE has installed launchable rock toes and trenches, they have left virtually no habitat, as shown in the picture of erosion protection features installed near Guy West Bridge for American River Erosion Contract 2 as well as USACE’s own erosion updates.

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[95] ARCF Final EIS/EIR - Jan. 2016, 9.
[96] Jeffrey Mount, *California Rivers and Streams*, 105.
[97] 2023 ARCF Draft SEIS/SEIR, 3-38.
[98]
[99] 2023 ARCF Draft SEIS/SEIR, Appendices, Appendix A. Nepa Scoping Materials, comment number 8-3.

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/construction-updates/2023/ARCF16_AR_SitRep_MAR2023.pdf?ver=GF4ENLWXHjne5Lhrg5GPcg%3d%3d

23 In best case scenarios, USACE leaves a few trees, but a few trees no more makes a habitat than a few houses makes a town. Even where USACE has spared a few trees, there is no other vegetation left—no bushes, shrubs, grasses, vines, etc. USACE cannot reasonably claim that habitat loss would be greater without erosion protection measures when they remove all the habitat in order to install the erosion protection measures.

One of the Segments where USACE did not remove all the trees

Second, the likelihood of habitat loss due to catastrophic flooding is not an inevitability. **There are trees in these forests which have survived multiple 160kcfs flood events. We should not trade the possibility of future habitat damage for the certainty of present habitat annihilation.**

Third, mitigation for CEQA and NEPA is measured against baseline conditions, not against projected future conditions. In other words, both CEQA and NEPA require mitigation measures that attempt to restore conditions as they existed before project implementation. As outlined in CEQA, "the lead agency should describe physical environmental conditions as they exist at the time the notice of preparation is publication."[100] A lead agency may use projected future conditions as a baseline "only if it demonstrates with substantial evidence that use of existing conditions would either be misleading or without informative value to decision-makers and the public."[101] A brief response to a public comment does not constitute "substantial evidence." Furthermore, an existing conditions baseline "shall not include hypothetical conditions."[102] Under NEPA, environmental data collection and analyses is completed prior to project implementation to provide an understanding of the baseline conditions for each potentially affected resource for reference when determining the predicted efficacy of mitigation commitments is being achieved.[103] In short, mitigation for both NEPA and CEQA are primarily based on existing conditions before project implementation, not on hypothetical future conditions, and USACE has not provided substantial evidence that future conditions should be used as a baseline.

24

NEPA also demands a "Commitment to seek funding" for the entire life of a project, and "if it is reasonably foreseeable that funding for implementation of mitigation may be unavailable at any time during the life of the project, the agency should disclose in the EA or EIS the possible lack of funding and assess the resultant environmental effects."[104] CEQ declares that "if the agency committing to implementing mitigation has not disclosed and assessed the lack of funding, and the necessary funding later becomes unavailable, then the agency should not move forward with the proposed action until funding becomes available or the lack of funding is appropriately assessed." [105] USACE has not identified mitigation funding for the 50 year life of ARCF, nor has it assessed what the environmental impacts of this lack of funding will be. According to the Army's regulations, "unless money is actually budgeted and manpower assigned, the mitigation does not exist."[106] Thus, without identifying mitigation funding for the 50 year life of ARCF, USACE cannot be said to be mitigating their environmental impacts and cannot claim impacts that are long term less than significant with mitigation.

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[100] CEQA, 15125(a)(1).
[101] CEQA, 15125(a)(2).
[102] CEQA, 15125(a)(3).
[103] Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011, p. 12.
[104] Ibid.
[105] Ibid, 9.
[106] Ibid, 17.

Identifying the potential long term costs of maintaining planting benches is critical because USACE has a history of implementing measures which end up burdening local governments with costly long-term commitments. For example, after storms inundated Santa Cruz during the 1950s, the Corps devegetated the San Lorenzo River, straightened it, and lined its channel with concrete and rip rap. They promised that these "improvements" would protect downtown Santa Cruz from a 100-year flood. Instead, the river attempted to restore its profile by filling the channel with 12 million cubic feet of sediment within 10 years of the project's completion. Santa Cruz subsequently spent millions of dollars to annually dredge a channel which can now only handle 25–30-year floods.[107] USACE should identify the possibility that planting benches will be a long term commitment for local agencies, particularly County Regional Parks. CEQ requires that the lead agency identify "all relevant, reasonable mitigation measures" even "if they are outside the jurisdiction of the lead agency" so as to "serve to alert agencies or officials who can implement these extra measures."[108]

Fourth, both the California and National Wild and Scenic River Acts make it policy that protected rivers and "their immediate environments shall be protected for the benefit and enjoyment of present and future generations."[109] The National WSRA declares that "each component of the wild and scenic rivers system shall be administered in such manner as to protect and enhance the values which caused it to be included in said system."[110] In essence, both WSRAs imply a "you break it you buy it" policy. It is the policy of the state and federal government to preserve and protect rivers in the condition they were in when they were inducted into the Wild and Scenic River Systems for both present and future generations.

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Even with planting bench mitigation, USACE's policies still likely run afoul of the State and Federal Wild and Scenic Rivers Acts. The Lower American River from the confluence to the Nimbus Dam was added to the National Wild and Scenic Rivers System in 1981 as a recreational river. In Appendix E of the "Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System," the US Interior Department and the Heritage Conservation and Recreation Service notes 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."[111] In other words, the scenic, aesthetic, and natural appearance of the river and its banks cannot be separated from what makes the river "recreational." Later in the chapter, the Interior Department and the Heritage Conservation and Recreation Service identify the resource values which made the Lower American River a suitable candidate for inclusion in the Wild and Scenic River System. Among

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[107] Jeffrey Mount, *California Rivers and Streams,* 302-304

[108] Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).

[109] Wild and Scenic Rivers Act, Sec. 1(b). California Wild and Scenic Rivers Act, 5093.50.

[110] Wild and Scenic Rivers ACt, Sec. 10(a).

[111] US Interior Department and Heritage Conservation and Recreation Service, "Appendix E" in *Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System* (1981), p. 9.

these values was “lush riparian growth that includes walnut, oak, cottonwood and sycamore trees.”[112] Part of what makes this “riparian hardwood strip” so valuable for recreation is that “the riparian vegetation is carefully protected,” allowing for the uniform dispersal along the river of “birdlife, including raptors and wading birds.”[113] We cannot say that vegetation has been “Carefully protected” after removing it altogether. Thus, any significant impacts from intentional actions, even short-term, to the riparian forests of the Lower American River would directly degrade the INTRINSIC conditions which makes the LAR a State and National Wild and Scenic River.

According to the secretarial designation which made the LAR a Wild and Scenic River, the LAR is to be managed in accordance with the classifications determined appropriate by the Heritage Conservation and Recreation Service.[114] In the Heritage Conservation’s “Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild and Scenic Rivers System,” they observed that the American River “is lined with lush riparian growth that includes walnut, oak, cottonwood, and sycamore trees.”[115] In classifying the Lower American River as “an outstandingly remarkable recreation waterway,” the Heritage Conservation Service observed 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.”[116] It singled out the “Parkway greenbelt” which provides “many recreation opportunities” that include “hiking” and “canoeing.”[117] They add that the American River and its adjoining riparian lands possess “notable wildlife and botanic values considering its proximity to an urban setting.”[118] Because of the proximity of lush riparian habitat to urban Sacramento, “students of all ages and members of the Audubon Society and the Sierra Club spend a considerable amount of time along the river observing wildlife.”[119]

In short, the riparian forests of the American River Parkway constitute an essential feature of its outstanding recreational values. Cutting down the forests for any reason may impair the outstanding remarkable values which makes the Lower American River recreational. Certainly, if the riparian forests can never come back because of the inevitability of the launchable stone launching, or because erosion diminishes the planting bench over time, then USACE’s chosen mitigation measure of planting benches fails. But even with mitigation, the act of mass habitat decimation may be irreconcilable with Wild and Scenic Rivers. Nevertheless, USACE needs to address the erodibility of planting benches, the long-term prospect of launched stone damaging

[112] Ibid, 26.
[113] Ibid.
[114] Federal Register, Vol. 46, No. 15, January 23, 1981.
[115] Heritage Conservation and Recreation Service, “Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild and Scenic Rivers System,” (1981), II-32.
[116] Ibid.
[117] Ibid.
[118] Ibid.
[119] Ibid.

the benches, and how they aim to restore and sustain riparian forests over the 50 year life of this project.

Even if USACE addresses the 50 year life of the project for planting benches, it is still uncertain whether or not their measures can be reconciled with the second outstanding remarkable value of the Lower American River, anadromous fishery. As stated in the vegetation management strategy of the 2017 Central Valley Flood Protection Plan Conservation Strategy, the removal of woody vegetation found on and near Central Valley levees "can result in ecological impacts that are considered essentially 'unmitigable' due to the unique nature of this landscape feature."[120] The NMFS Recovery Plan points to the construction of "armored banks" as a major contributor to the decline of endangered salmonids which rely on wetlands and riparian habitats.[121] Approximately 95% of the historical wetlands and riparian habitats no longer exist in the Sacramento and San Joaquin Valley, and the remaining riparian habitat is highly fragmented.[122] Consequently, more than 16 species associated with the habitats of the Sacramento and San Joaquin Valley are now listed under the California Endangered Species Act or ESA, and 22 other animal species dependent on floodplain habitat are considered sensitive species.[123] Salmonids have especially been hurt by revetment projects, which have eliminated much of the high value SRA cover along the banks of the Sacramento and San Joaquin River Systems.[124] Spawning salmon need clean gravel with small to moderate pebbles to build their redds.[125] By replacing small rocks and pebbles with large stones, revetments such as launchable rock features impair salmonid habitat. Planting benches do not necessarily mitigate the habitat destruction caused by launchable rock revetments. The 2017 CVFPP Conservation Strategy found that "for anadromous fish, the habitat value of woody vegetation planted in revetment, relative to SRA cover, is uncertain."[126]

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Both CEQA and NEPA require that lead agencies consider the cumulative impacts of their projects. CEQ's NEPA regulations define cumulative impacts as the "impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions."[127] CEQA asks agencies to look at whether or not projects are "cumulatively considerable," which means that "individual effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."[128] **USACE has not considered how removing 685 trees from the riparian corridor between Larchmont**

28

[120] CVFPP Conservation Strategy (November 2016), Appendix D. Vegetation Management Strategy, D-3.
[121] Annalisa Louise Batanides Tuel. 2018. "Levee Vegetation Management in California: An Overview of Law, Policy, and Science, and Recommendations for Addressing Vegetation Management Challenges," *Environs*: 381.
[122] Ibid, 394.
[123] Ibid, 395.
[124] Ibid, 397-398.
[125] Ibid, 397.
[126] Ibid, 8-8.
[127] June 24, 2005 Memorandum, Council on Environmental Quality, Re: Guidance on the Consideration of Past Actions in Cumulative Effects Analysis, p. 2.
[128] CEQA, 15065.

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Community Park and Howe Avenue and in many places installing large stones at river's edge so soon after decimating the riparian habitats at river park and before mitigation plantings can mature will compound environmental impacts on SRA habitat that vulnerable salmonid populations need to survive. If USACE carries through with Contract 3B, for at least several years there will not be a single fully intact mile of riparian corridor on the Lower American River from Larchmont Community Park to Paradise Beach, a stretch covering 6 miles, more than a quarter of the 23 mile Wild and Scenic Lower American River. Given how fragmented and narrow SRA habitat is already, this does not bode well for salmonids.

Certainly, apprehensive local fisherman, based on years of experience, are not convinced that USACE has fully considered considered the ecological implications of its actions, nor that its selected mitigation methods will work. The following is the perspective of a local area fisherman, who wishes to remain anonymous.

> "Coming from a family of fishermen and being a fisherman myself, I find it hard to believe that anyone who had done their research before destroying many miles of the river bank, would not have concluded the massive damage they would be creating for the fish and their natural habitat. From my many years of fishing, we always stayed close to and fished the banks of the water. Whether a river, lake or stream, the fish naturally hide, feed from and have their habitat along the water's edge. If you want to find fish, you almost always stay along the edge of the water where you find rocks, fallen trees, branches, grasses and overhangs where they protect themselves. This goes for many types of fish, of which I am used to fishing for.
>
> After going out to see the American River and following the edge of the water, all I could think of is what about the fish? Their entire natural habitat is completely destroyed from this project. I also have seen the absolutely useless areas, where this project had chained old trees along the river, thinking it would be the new fish habitat. We are in the middle of winter, which is our rainy season and the majority of these trees are not even in the water. The only time they would be, is in a flood season where the river would come up high enough to do anything at all for the fish and even then would only be a tenth of what was destroyed. Being here, in California, it seems like we are in drought more years than not, so the conclusion is what a futile waste and where will the fish go? Someone did not think this through very well or at least did not do their research well, or maybe at all! "

Below is another picture taken from the Guy West Bridge, this time facing the right bank looking left. As the fisherman observed, the bundles of woody material that is supposed to provide habitat for fish populations is nowhere near the water's edge in most cases.

Not only will destroying mature forest threaten salmonid populations, but the laying down of launchable rock on numerous beaches in the contract 3b area will make several beloved beaches in the contract 3b area forever inaccessible. Once again, this was a concern raised in 2016. Apprehensive citizens wrote that

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> The final EIS/EIR does not adequately characterize the many varied uses of the river and Parkway. Thus, it cannot and does not catalog and assess the harms to such uses that will be the result of the proposed project. For instance, the impacts to recreation seem focused on use of the parkways paved bikeway. While a key

asset, there are other equally worthy of close consideration, such as **swimming, shoreline recreation, fishing**, walking, and bird watching.[129]

Another comment, from M.B. Schwehr, recalls how after five years where USACE installed revetments at left bank river mile 10.3 in 2011,

> "the shady, serene river trails and river shoreline no longer exist, and will not for decades due to removal of nearly all the majestic trees in that stretch, despite assurances that 'most' would be spared. The shoreline is un-useable for any recreation due to the large quarried rocks.[130] "

We can better understand M.B Schwehr's dismay by comparing what the revetted shoreline of left bank river mile 10.3 to the as yet unrevetted shoreline of the adjacent shoreline.

Riveted left bank river mile 10.3

[129] Letter from Matthew Carr, Graham Brownstein, et al, in ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement.
[130] Letter from M.B. Schwehr, in ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement.

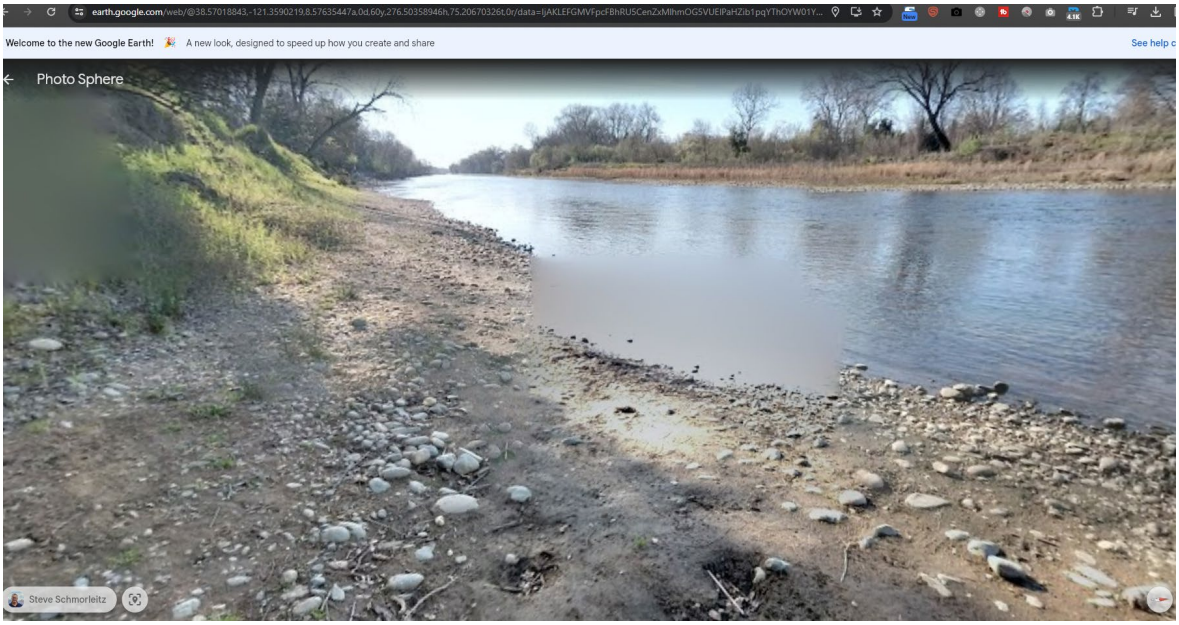
Adjacent shoreline at left bank river mile 10.4-10.5

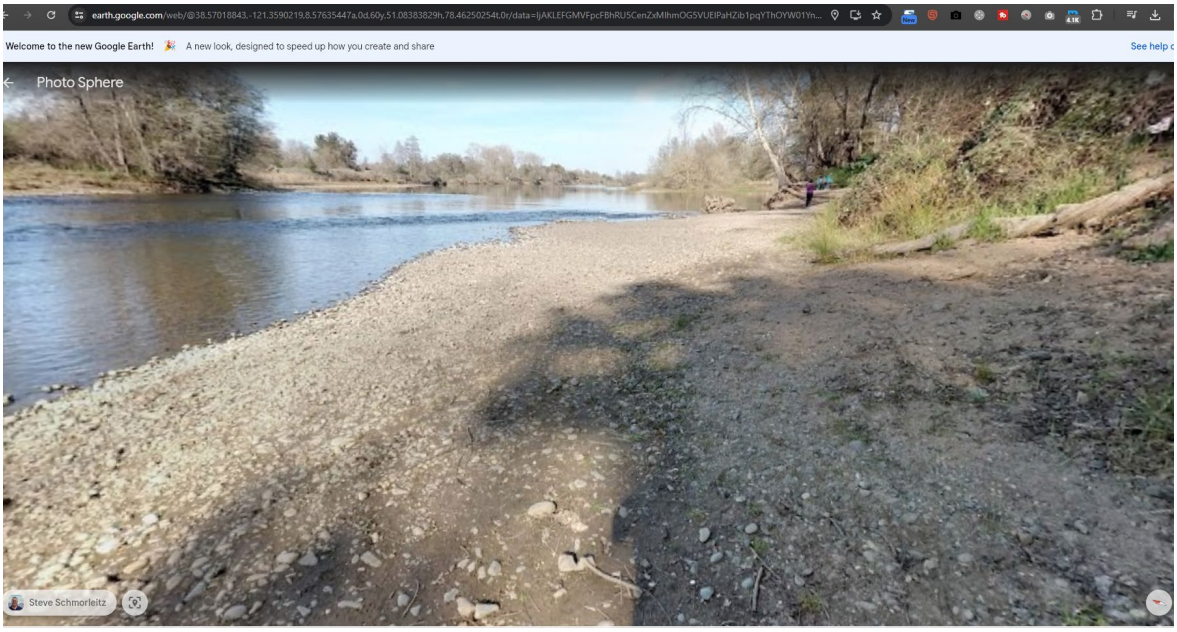
The unrevetted shoreline is usable for walking, swimming, launching a canoe, or fishing. The rivetted shoreline is covered with large rocks and is unusable for the public.

To apprehensions about loss of access to shoreline recreation, fishing, and swimming, USACE assured that "once construction is complete and mitigation plantings have been established, access to the water's edge in the construction footprint will be permitted."[131] This does not address concerns that launchable stone will eliminate beaches altogether. In fairness, launchable rock toes had not been proposed in the 2016 GRR. But now that they are part of USACE's proposals, USACE needs to address how they will affect access to beaches and consider what mitigation measures can be taken for launchable stones at water's edge. USACE understands that beaches are an aesthetic and visual resource. Section 4.4 of the 2023 Draft SEIS/SEIR lists "sandy beaches" as part of the aesthetics and visual resources of the SRMS.[132] Elsewhere in the SEIS/SEIR, USACE mentions that "shorelines provide hunting grounds for wading birds such as herons and egrets, and for kingfisher waterfowl, and shorebirds."[133] Yet not once in the 2023 Draft SEIS/SEIR does USACE address loss of shoreline due to the installation of launchable rock toes. At left bank river mile 10.4-10.5, USACE's proposed launchable rock toe may make two beloved beaches forever inaccessible.

[131] Letter to Graham Brownstein from Josephine R. Axt, May 24, 2016, in ARCF Final EIS-EIR - Jan. 2016, Appendix F-Public Involvement. P. 2.
[132] 2023 ARCF Draft SEIS/SEIR, 4-139.
[133] Ibid, 4.1-16.

Here are the beaches at left bank river mile 10.4-10.5 as they were photographed for google earth





https://earth.google.com/web/@38.57018843,-121.3590219,8.57635447a,0d,60y,0h,85t,0r/data=IjAKLEFGMVFpcFBhRU5CenZxMlhmOG5VUElPaHZib1pqYThOYW01YnRLVF9JRDRpEAU6AwoBMA

Launchable Rock Toe Near Sac State

CEQ states that

> Mitigation measures must be considered even for impacts that by themselves would not be considered "significant." Once the proposal itself is considered as a whole to have significant effects, all of its specific effects on the environment (whether or not "significant") must be considered, and mitigation measures must be developed where it is feasible to do so.[134]

USACE has not considered the impacts of its proposals on the beaches of the contract 3b area. NEPA requires that it not only consider those impacts, but also consider any feasible mitigation measures.

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American River Erosion Contract 3B creates so much uncertainty for public safety, for heritage trees, for mature riparian forest, for salmonid populations, and for recreational resources that the only prudent course of action for USACE is to reconsider and redesign the whole project. USACE should follow the recommendations of its own experts and account for erosion resistant areas of the LAR in its analysis. They should take into account recent, advanced high-fidelity hydraulic modeling instead of relying on a 20 year out of date 2-d model that likely overestimates velocities along banks with mature riparian vegetation. Where erosion measures are still deemed necessary after accounting for erosion resistant areas and using more up-to-date hydraulic modeling simulations, USACE should sincerely explore biotechnical and bioengineering alternatives and present those alternatives to the public in another SEIR/SEIS. Too much is at stake for our Wild and Scenic River for USACE to do otherwise.

[134] Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).

INDIV-747

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

Karen Kunstler <karenkunstler@gmail.com>
Fri 2/23/2024 4:43 PM
To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>
Cc:Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>;RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>

Some people who received this message don't often get email from karenkunstler@gmail.com. Learn why this is important

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.
Karen Kunstler

INDIV-748

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

Beth McClure <bethmcclure1@me.com>

Fri 2/23/2024 2:00 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 bethmcclure1@me.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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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.
Elizabeth McClure MD
SIERRA OAKS VISTA RESIDENT, Sacramento County

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:45 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

From: Christie Vallance <christiev44@gmail.com>
Sent: Friday, February 23, 2024 5:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report 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. 1

I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. The American River Parkway is extremely valuable to me.

Concerns:

I recently discovered in my review of your velocity modeling that makes up the premise of your decision to restructure the river banks for Project 3b, that the Lower American River Streambank Erosion Monitoring Report of 2017 and their map of velocity contours differs significantly from the model that you are using. I also noticed that the 2021 Numerical Study on the Effect of Bank Vegetation on the Hydronamics of the American River under Flood Conditions" report shows the positive effect that trees on riverbanks has on the velocities along the banks. Can you explain the differences between these findings and the velocity models you 2

present in your report? Can you explain how your project plan is informed by this information? I will be looking for this explanation in your report.

Sincerely,

Christie Vallance

February 23, 2024

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

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, SEIS/SEIR XIV

Mr. Romine and Mr. Brown:

So that I am not repetitive with other commenters, whose thoroughness of review and depth of analyses are excellent and worthy of serious consideration, I submit that I fully concur with and support the concerns and requests expressed by these commenters.

1 Regarding mitigation, Urrutia Pond provides important habitat for wetland-dependent bird species, plants and associated insects. I am concerned that the change in character and resources brought about by the conversion of Urrutia Pond to a *seasonally* flooded riparian area would significantly impact the species that rely on the pond for feeding, resting and night-roosting.

The SEIS/SEIR does not, but needs to, acknowledge the *impacts* from a possible conversion of Urrutia Pond, as well as provide the assessments completed and the rationale used for the rejection of other alternative sites considered. Unfortunately, the SEIS/SEIR *does not include* alternatives to the Urrutia Pond for mitigation, though there *are* alternative sites, since SAFCA had GEI prepare a report identifying multiple potential mitigation sites. These must be identified and considered as possibilities and the SEIS/SEIR needs to reflect this. I believe it will be necessary, therefore, for the public comment period to be further extended (or put on hold) until this oversight can be rectified and the public can evaluate and comment on the impacts to, and suitability of, these alternative sites. Please confirm for the public that comments to be provided in a new or extended comment period will be combined with comments already submitted.

For the reasons given here, I ask that Urrutia Pond be removed from consideration and, at least, be left AS IS.

2 I am deeply concerned about the great loss of valley oaks and associated habitat and the long-term, cumulative, direct and indirect impacts on the effected ecosystem and elimination of the biological resources and processes from the project impact areas. I am appealing with you to go over and beyond the standard approach to mitigation. To put it simply, but clearly, the complete removal of habitat down to soil, with the resulting loss of ecological value, nutritive soil and mycorrhizal fungi and other micro-nutrients, means the *return to the pre-project condition is too great to "mitigate,"* given the time window required to go through the process of succession to reach maturity, while also mitigating for failed plantings, low vigor, or project-related problems. For all intents and purposes, these long-term impacts to more mature habitat may as well be considered permanent. The standard cookie-cutter mitigation formula is grossly inadequate for the full extent of such long-term impacts.

The riverbanks of already-completed sections have been razed, and birds, wildlife, insects, amphibians, and reptiles have been displaced or killed, either directly or indirectly. Significant food sources, like acorns, walnuts, elderberries, many types of seeds from trees, shrubs, annual and perennial forbs, and grasses, and the refuge of shade are gone from these sites, and will be for quite some time. Breeding habitat for some species is also gone, with vacancies in other areas in the Parkway being hard to find. This reduces annual recruitment, the data about which will be unknown, although trends might show up in the annual wildlife counts. The impacts of this complete habitat loss are truly immeasurable and are unacceptable to us who love and value our American River Parkway, Sacramento's "Crown Jewel," with many jewels now stripped from her crown.

Important, too, though not critical life-or-death for us, are the losses experienced by the people of Sacramento County, who come to the Parkway for its beauty, peacefulness, wildlife viewing, fishing, paddling, cycling, running, horseback riding, escape from stress and the busy workweek, and many other wellness-related qualities that brought the river to be both state and federally designated as a "Scenic River." The project has left major, unsightly scars on the view-shed that
3 are distressing to people, and which were potentially avoidable and/or greatly minimizable, per **https://nbsguidance.org/ Nature-Based Solutions**
https://ewn.erdc.dren.mil/international-guidelines-on-natural-and-nature-based-features-for-flood-risk-management/

Given the extreme nature of this project and the severity of impacts, I urge that an alternate formula for higher mitigation ratios be determined in conjunction with community stakeholders, that would also include an additional dollar amount, with the first priority for purchase of 1) land that would be incorporated in to the American River Parkway (i.e., 20 lower acres of TruMark property); then 2) obtainable land of equal value that would be incorporated into one or more Sacramento County Regional Parks units; or, if 1 or 2 cannot be accomplished, 3) a payment equal to the value of #1 above, to Regional Parks for future purchase.

I realize my mitigation request is unorthodox. The multiple layers of very long-term, ecologically destructive and unsightly impacts from the project are many, significant and complex. The least USACOE can do is to apply the funds necessary to make as whole as possible the American River Parkway, and in so doing, the people for who it has been created and preserved by law.

4 If you are willing for the future to explore other avenues for erosion control, see Nature-Based Solutions at https://nbsguidance.org/ -and- https://ewn.erdc.dren.mil/international-guidelines-on-natural-and-nature-based-features-for-flood-risk-management/, the now reams of comments and protest by the public and non-profits would become minimal by comparison. Looking at this link and attached photos, you will see that USACE is represented. Why not here in Sacramento? I urge you to contact your partners and seek guidance on employing nature-based solutions. If it can prevent razing river banks, wouldn't it be worth a try?

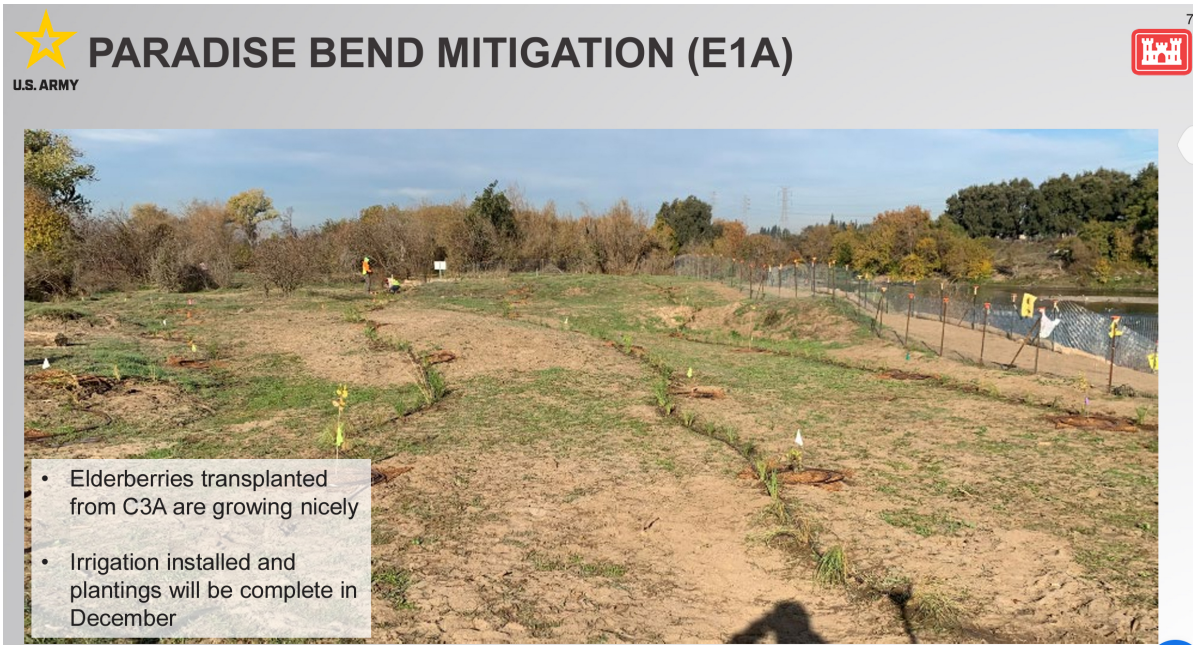
Thank you for extending the comment period to Feb 23; although I am asking for it to be further extended for the reasons I provided above.

Respectfully,

KELLY COHEN

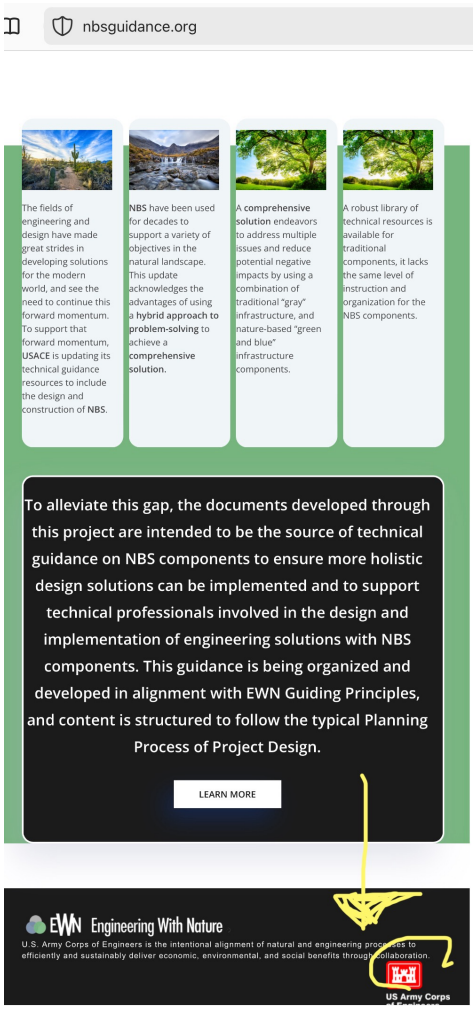
Attachments
CC Save the American River Association

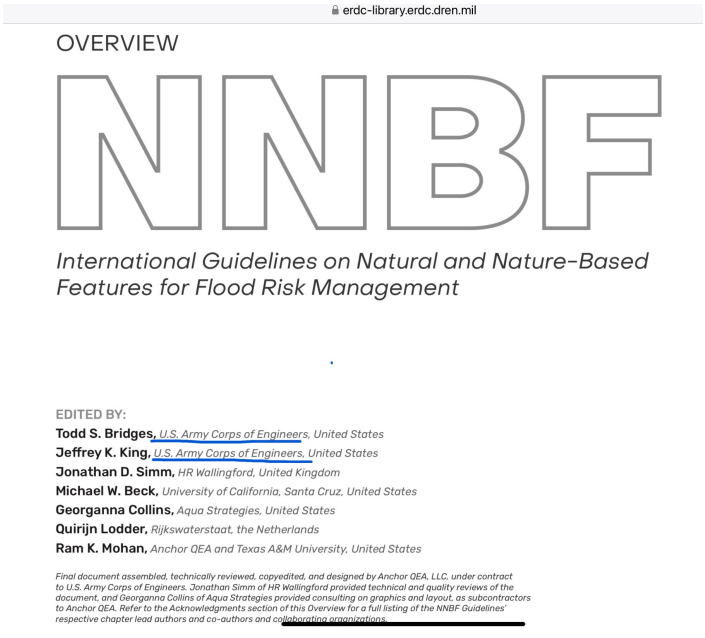
COMMENT: Plantings in rows make it easier for people looking to "cut through." Native plant species like wild rose or wild blackberry, & native shrubs with spines or hard-to-bend branches, where planting locations are suitable, are good deterrents.
I suggest more random spacing so there isn't the appearance of a trail from any direction, so that when it appears used once, it will soon establish itself as one trail, then will come another, as evidenced in aerial photos:



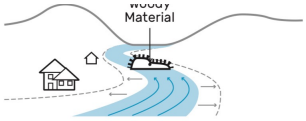
Even with fast-growing willow & cottonwood near the river & other riparian-associated species up to the levee shoulder, it will be a long haul through succession to the prior level of habitat

maturity & complexity, if human use/ overuse doesn't hinder it or riddle it with cut-through trails. How will you protect it during establishment?:



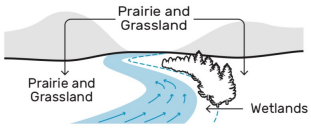


USACE in partnership with



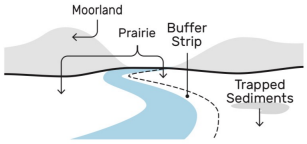
River and Floodplain Management

- Slows flood flows
- Encourages flood storage
- Creates bypasses to move water away from commu
- Provides ecological and aquatic habitat benefits



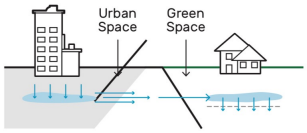
Vegetation Management

- Slows water
- Encourages infiltration in soil
- Enables evapotranspiration
- Increases roughness and slows flow



Rural Runoff Management

- Captures water flow
- Slows and stores water
- Encourages infiltration
- Traps sediments



Urban Runoff Management

- Retains and stores water in green space
- Slows delivery of water to sewer system

Erosion Management

- Protects riverbanks
- Reduces erosion of banks
- Replaces hard engineering with vegetated banks

Key Messages

1. Past modifications of rivers and their basins have increased the risk of flooding. Climate change, anthropogenic features, and land use changes have increased the stress on natural fluvial systems and their functions, asserting more pressure on FRM infrastructure.
2. NNBF help mitigate these impacts, reducing both the level of flood risk and our dependence on engineered flood control structures while also restoring the natural environment, providing societal and ecological co-benefits.
3. As the benefits of NNBF are realized, more people are likely to see these benefits and want NNBF implemented in their watersheds. Monitoring and adaptive management of NNBF are needed to demonstrate the added benefits.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 12:10 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Please Help Ensure a Better USACE Proposal for American River 3B Project

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From: Jamie Hall <maxjoe1997@sbcglobal.net>
Sent: Friday, February 23, 2024 5:13 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Please Help Ensure a Better USACE Proposal for American River 3B Project

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.

Ron Hall

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 12:10 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: Jamie Hall <maxjoe1997@sbcglobal.net>
Sent: Friday, February 23, 2024 5:13 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.

[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)).

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.
Jamie Hall

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 12:09 PM
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

-----Original Message-----
From: billy langford <wizardcody@hotmail.com>
Sent: Friday, February 23, 2024 5:12 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.

[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)).

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.

[NAME]

Sent from my iPhone

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814
Guy.K.Romine@usace.army.mil

Mr. Josh Brown
Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, California 95821
Josh.Brown@water.ca.gov

Submitted via email: ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

February 23, 2024

Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Dear Mr. Romine and Mr. Brown:

Thank you for the opportunity to comment on the reports pertaining to this important project.
I am a lifelong naturalist, bird watcher, photographer, and the daughter of a professional artist and an engineer, who channeled capacity for innovation with tangible problem solving into specialization as a physiatrist, with a concentration on catastrophic care and care coordination. I am also a nationally recognized expert on Environmental Health, and in particular, the adverse impacts of disasters upon vulnerable populations. My NFP, the Multicultural Health Institute represents thousands of vulnerable individuals and communities across the country. My daily work involves preventing, educating about and treating catastrophic injuries and teaching health systems about preparation and response to environmental disasters for vulnerable communities..

Any good clinician knows the importance of clinical judgement, lifelong commitment to learning and acquisition of "clinical experience" to apply to achieve greater success in subsequent cases and scenarios, while also exercising, at times, independent critical analysis and decision making for the best outcomes.

When I diagnosed my own mother with lung cancer, after failure of the disconnected health care system to do so, the standard of treatment at that time was annihilation of the patients' immune system with potent chemotherapeutic agents with the hope that the more rapidly dividing malignant cells would be more adversely impacted than the 'acceptable collateral damage" of healthy tissue. Dire side effects and poor outcomes did not deter such approaches for decades, it is what medicine had to work with.

We stepped right past that, and were able to secure a variety of treatments for her only just emerging at that time nearly 2 decades ago, but far more logical-targeting the invading abnormal cancer cells, without pulverizing and paralyzing the entire immune system, permitting her own defenses to help fight back. Knowing she had survived pneumonia as a child in pre-antibiotic era, we knew she had a very strong immune system, and it was so, defying all odds, she not only beat slim odds to make 5 years, going to prolifically to enjoy nearly 3 x that amount of extended quality of life.

Yet ironically, speaking of antibiotics, due to their wanton overuse, we have cultivated armies of resistant microbes, and in some places, physicians have gone full circle, resorting to more "natural approaches" to

treat minor infections, with better outcomes, rather than excessive prescribing of antibiotics and cultivating more and more resistance.

The analogy is-nurture nature, work together with and play to strengths. Thus in the case of the decimation of the carefully balanced ARC ecosystem that has evolved over millennia, such folly will end in similar results as my mother's unfortunate elder sister and many others who only had the options of brute force destruction of their natural defenses in attempt to blunt the progression of their cancers before new thought/innovative approaches and international collaborations produced far better options.

My motivation to live near the incredible jewel of the American River Parkway is similar to that of my neighbors, most of whom share a sense of caretaking devotion for the privilege of living near and being able to enjoy this unique, nationally recognized, well studied and treasured ecosystem. The engineer daughter that grew up on an island part of me carefully studied the history and risks of living so close to the river, and I was and remain quite reassured that we are and have been on the safest, straightest, widest low flow stretch, in large part due to the natural defenses that exist and have been proven to WORK WELL over time. In medicine, "1st Do No Harm" is a very useful adage to follow, same with regard to this project.

As part of my consulting work, I perform complex analyses of forensic cases, considering all sides as an Agreed Medical Examiner, to produce an objective set of recommendations and conclusions. In analyzing available data and speaking with neutral and objective engineers and water experts who do not stand to benefit from whatever final outcome of the C3B project, they echo and confirm the following factual evidence:

1. There is little to no historical precedence of trees being a risk factor for levee stability, in fact, removing them has served to destabilize other levee projects and we all know it takes not just years, but decades and centuries to re -establish complex Riparian habitats.
2. The removal of large heritage oak trees and other habitat along the levee so that rock/riprap can be placed is a costly and unnecessary action, these trees already provide erosion protection along the levee.
3. Erosion is a minute concern, and as has been tested repeatedly in the C3 and C3b sections, nature restores loss through gradual recession of high waters in a majestic and breathtaking display of balance between the trees, vegetation and water cycles. For example, during the floods of 1997 and high water levels last winter, the flow rates along the levee were nearly stagnant with higher flows towards the center of the river channel, well away from the levee. Recovery during receding flows was rapid and well complete.
4. Such flows occur infrequently, are of short duration and will be further abated by the new spillway at Folsom Dam.
5. Removal of well matured, compacted soils replacing with alternatives based on soil samples from other locations not reflective of unique qualities of this location will result additional failed plantings (status update on prior areas welcomed) and further washing away and exposure of dangerous jagged rocks as has already happened in denuded areas downstream.
6. There is acknowledged risk to environmentally threatened species and their habitats, and the risk vs Benefit is insufficient to justify proceeding with clear cutting a stable, and previously deemed stable with no need for intervention, section of the river parkway.
7. Working with the natural inclinations and defenses of the river, rather than literally undermining them by tearing out historic and protected old grown Heritage Oaks and other layers of the forest, will continue and ensure stabilization and enjoyment for continued generations of humans and wildlife to come.
8. It is the 50th anniversary of the endangered species act, and we averted mass death and destruction of habitats, and species, however, we know significant threat continues. Every effort must be

made to keep balance and preserve rare urban reserve sites such as targeted 4, C3 and C3b North and South sections of the river.

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9. This action is likely to further adversely affect critical habitat and threatened species including the Chinook Salmon, Central Valley Steelhead, North American Green Sturgeon, Long Horn Beetle ("mitigated" Elderberry bushes from other sections mostly dead/dying off, failed effort) as well as hundreds of local and migratory bird populations whose nesting, mating and feeding habits will be disrupted by noise, habitat destruction and greater vulnerability to predators.

8

10. 2023 was the hottest year on record, Sacramento was sweltering, however near the river, we were always benefitting from the breezes and cooling effect of the trees and vegetation through shade and transpiration, losing that will worsen the "heat island effect" with adverse population health consequences. The IRA seeks to mitigate the adverse effects of heat, it is illogical to contribute to worsening life threatening conditions in the name of preventing a problem that does not exist- erosion.

9

11. This area is prioritized for recreational access and enjoyment by the public for kayaking, fishing, bird watching, fishing, wading with dogs, nature photography, spiritual practices, all of which will be severely interrupted and access forever limited by replacement of accessible shoreline beach with jagged rocks of uncertain source.

10

12. Communities with strong cohesive social connection and exposure to nature are hallmarks of well touted "blue zones" around the world. It is well documented that even in economically limited resourced communities, people live longer, healthier and more satisfied lives when there are strong social connections, regular physical activity and connection to the natural world. Average blood pressures are lower, there is lower incidence of Diabetes and other autoimmune disorders and life expectancy is longer. This is why, despite having lived and worked in a variety of other beautiful and desirable national and international locations, I repeatedly return to enjoy my home in College Greens East, and the American River Parkway adjoining our community is central to that. There are decades of neighbors and intergenerational family connections creating a rich fabric of support, celebration of life contributing to great resilience, improved health and mental health for us all. Destruction of this may contribute to destruction of decades of such relationships as well, with resultant destabilization and adverse mental health and health effects.

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13. The Elementary school and its activities as well as the Larchmont Park are other extremely active components of healthy and happy community life. This area is used year round by youth groups, intramural sports teams, multicultural communities enjoying the playground and socializing with their children, dog walkers and tennis and pickleball players. Heavy equipment rumbling through with clouds of dust, diesel, vibrations, destruction of the beautiful vista at the end of the park and possible further destabilization of the levee in order to put in a few extra rocks along the edge seems an incredible waste of resources and unnecessary disruption in community life.
14. I have already treated a patient who was out walking with her family in the recently "improved" areas near Sac State, the sandy inadequately reinforced levee gave way underneath her, causing her to tumble down and onto the jagged rocks, sustaining fractures, lacerations and head trauma. Sad irony that an intervention meant to protect the public leads to greater risk and further restriction from doing what I like to see as a physician-exercising, managing stress through peaceful interaction with natural surroundings, breathing healthy air and generally enjoying themselves.

Thus on behalf of my community, which includes humans as well as the myriad forms of wildlife and vegetation, we urge the Army Corps to reconsider the further work on the American River Parkway. This parkway is a nationally designated wild and scenic area heavily enjoyed by the public and safe habitat for endangered and threatened species that shall be severely degraded including as noted:

May 12, 2021

Alicia E. Kirchner
Chief, Planning Division
U.S. Army Corps of Engineers
1325 J Street
Sacramento, CA 95814-2922

Re: Endangered Species Act Section 7(a)(2) Biological Opinion, Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response for the American River Watershed Common Features General Reevaluation Report Reinitiation 2020

Enclosure

cc: 151422-WCR 2020-SA00019

Andrea Meier, Andrea.J.Meier@usace.army.mil
Rena Eddy, Rena.Eddy@usace.army.mil
Robert Chase, Robert.D.Chase@usace.army.mil

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
West Coast Region
650 Capitol Mall, Suite 5-100
Sacramento, California 95814-4700

Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response

American River Watershed Common Features General Reevaluation Report

NMFS Consultation Number: WCRO-2020-03082

Action Agency: United Stated Army Corps of Engineers

Affected Species and NMFS' Determinations:

ESA-Listed Species	Status	Is Action Likely to Adversely Affect Species?	Is Action Likely To Jeopardize the Species?	Is Action Likely to Adversely Affect Critical Habitat?	Is Action Likely To Destroy or Adversely Modify Critical Habitat?
Central Valley spring-run Chinook Salmon ESU (*Oncorhynchus tshawytscha*)	Threatened	Yes	No	Yes	No

California Central Valley steelhead DPS (*O. mykiss*)	Threatened	Yes	No	Yes	No
Southern DPS of North American green sturgeon (*Acipenser medirostris*)	Threatened	Yes	No	Yes	No
Sacramento River winter-run Chinook salmon ESU (*O. tshawytscha*)	Endangered	Yes	No	Yes	No

Fishery Management Plan That Identifies EFH in the Project Area	**Does Action Have an Adverse Effect on EFH?**	**Are EFH Conservation Recommendations Provided?**
Pacific Coast Salmon	Yes	Yes

Consultation Conducted By: National Marine Fisheries Service, West Coast Region

Issued By: A. Catherine Marcinkevage

Cathy Marcinkevage
Assistant Regional Administrator for the California Central Valley Office

Date: May 12, 2021

I take issue with the following purported minimal impacts extracted from the 2016 and supplemental 12.2023 SEIR including :

-changes in scenic view and existing visual character,
-creation of new sources of substantial light and light pollution,
-conflicts with existing environmental standards including violation of air quality standards
-increased noise,
-increased vibrations,
-destruction of culturally and spiritually significant areas,
- interruption and contamination of optimal storm and groundwater management

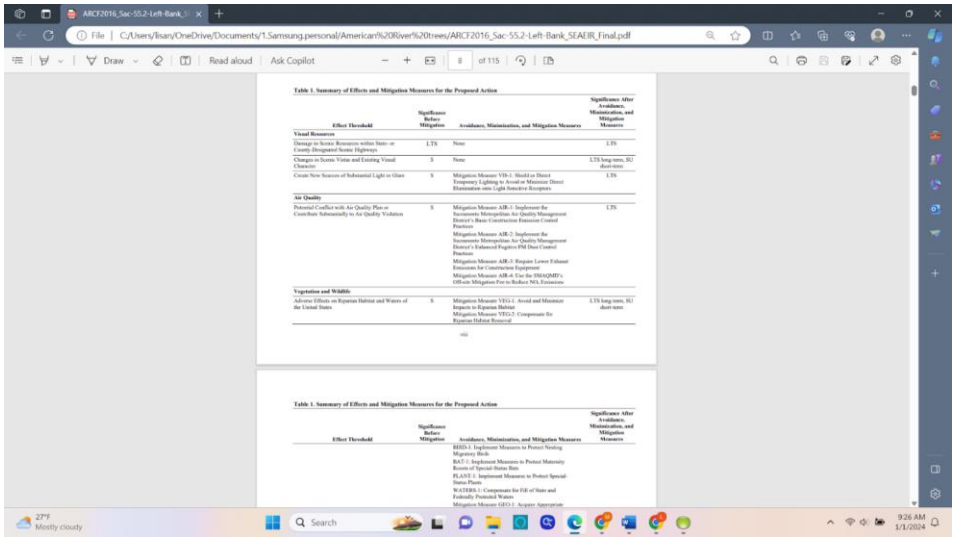

Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
Visual Resources			
Damage to Scenic Resources within State- or County-Designated Scenic Highways	LTS	None	LTS
Changes in Scenic Vistas and Existing Visual Character	S	None	LTS long-term, SU short-term
Create New Sources of Substantial Light or Glare	S	Mitigation Measure VIS-1: Shield or Direct Temporary Lighting to Avoid or Minimize Direct Illumination onto Light Sensitive Receptors	LTS
Air Quality			
Potential Conflict with Air Quality Plan or Contribute Substantially to Air Quality Violation	S	Mitigation Measure AIR-1: Implement the Sacramento Metropolitan Air Quality Management District's Basic Construction Emission Control Practices Mitigation Measure AIR-2: Implement the Sacramento Metropolitan Air Quality Management District's Enhanced Fugitive PM Dust Control Practices Mitigation Measure AIR-3: Require Lower Exhaust Emissions for Construction Equipment Mitigation Measure AIR-4: Use the SMAQMD's Off-site Mitigation Fee to Reduce NOx Emissions	LTS
Vegetation and Wildlife			
Adverse Effects on Riparian Habitat and Waters of the United States	S	Mitigation Measure VEG-1: Avoid and Minimize Impacts to Riparian Habitat Mitigation Measure VEG-2: Compensate for Riparian Habitat Removal	LTS long-term, SU short-term

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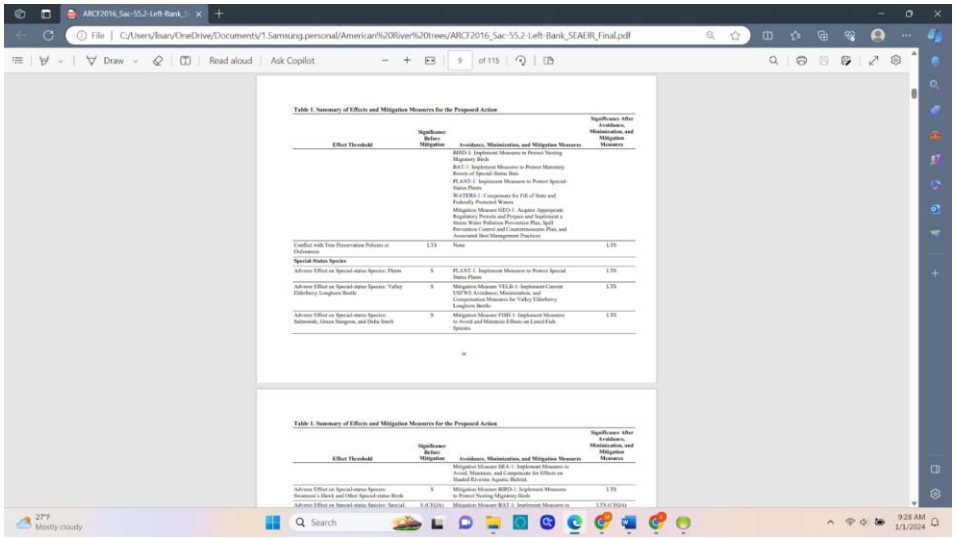
Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
		BIRD-1: Implement Measures to Protect Nesting Migratory Birds BAT-1: Implement Measures to Protect Maternity Roosts of Special-Status Bats PLANT-1: Implement Measures to Protect Special-Status Plants WATERS-1: Compensate for Fill of State and Federally Protected Waters Mitigation Measure GEO-1: Acquire Appropriate	



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Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
		BIRD-1: Implement Measures to Protect Nesting Migratory Birds BAT-1: Implement Measures to Protect Maternity Roosts of Special-Status Bats PLANT-1: Implement Measures to Protect Special-Status Plants WATERS-1: Compensate for Fill of State and Federally Protected Waters Mitigation Measure GEO-1: Acquire Appropriate Regulatory Permits and Prepare and Implement a Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures Plan, and Associated Best Management Practices	
Conflict with Tree Preservation Policies or Ordinances	LTS	None	LTS
Special-Status Species			
Adverse Effect on Special-status Species: Plants	S	PLANT-1: Implement Measures to Protect Special-Status Plants	LTS
Adverse Effect on Special-status Species: Valley Elderberry Longhorn Beetle	S	Mitigation Measure VELB-1: Implement Current USFWS Avoidance, Minimization, and Compensation Measures for Valley Elderberry Longhorn Beetle	LTS
Adverse Effect on Special-status Species: Salmonids, Green Sturgeon, and Delta Smelt	S	Mitigation Measure FISH-1: Implement Measures to Avoid and Minimize Effects on Listed Fish Species.	LTS

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Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
		Mitigation Measure HRA-1: Implement Measures to Avoid, Minimize, and Compensate for Effects on Shaded Riverine Aquatic Habitat	
Adverse Effect on Special-status Species: Swainson's Hawk and Other Special-status Birds	S	Mitigation Measure BIRD-1: Implement Measures to Protect Nesting Migratory Birds	LTS
Adverse Effect on Special-status Species: Special	S (CEQA)	Mitigation Measure BAT-1: Implement Measures to	LTS (CEQA)

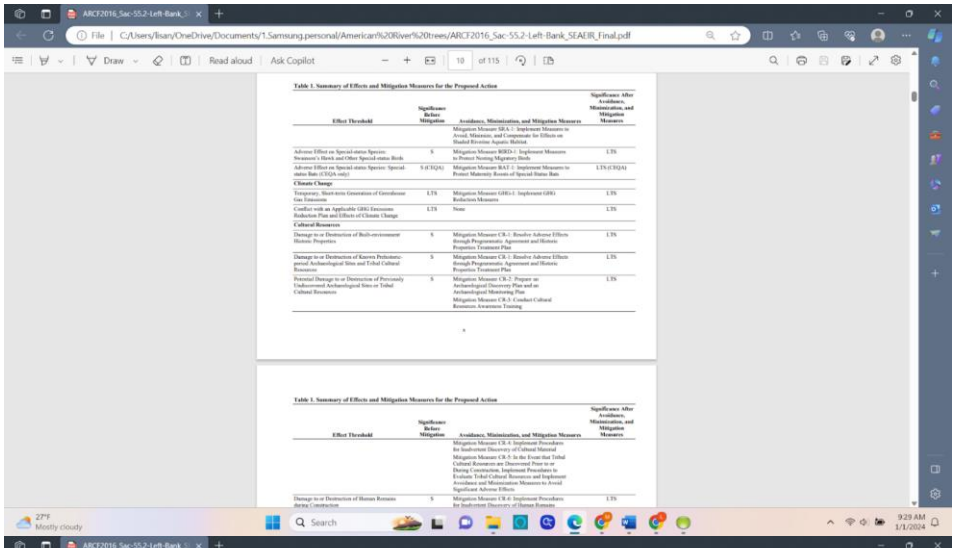

Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
		Mitigation Measure SRA-1: Implement Measures to Avoid, Minimize, and Compensate for Effects on Shaded Riverine Aquatic Habitat	
Adverse Effect on Special-status Species: Swainson's Hawk and Other Special-status Birds	S	Mitigation Measure BIRD-1: Implement Measures to Protect Nesting Migratory Birds	LTS
Adverse Effect on Special-status Species: Special-status Bats (CEQA only)	S (CEQA)	Mitigation Measure BAT-1: Implement Measures to Protect Maternity Roosts of Special-Status Bats	LTS (CEQA)
Climate Change			
Temporary, Short-term Generation of Greenhouse Gas Emissions	LTS	Mitigation Measure GHG-1: Implement GHG Reduction Measures	LTS
Conflict with an Applicable GHG Emissions Reduction Plan and Effects of Climate Change	LTS	None	LTS
Cultural Resources			
Damage to or Destruction of Built-environment Historic Properties	S	Mitigation Measure CR-1: Resolve Adverse Effects through Programmatic Agreement and Historic Properties Treatment Plan	LTS
Damage to or Destruction of Known Prehistoric-period Archaeological Sites and Tribal Cultural Resources	S	Mitigation Measure CR-1: Resolve Adverse Effects through Programmatic Agreement and Historic Properties Treatment Plan	LTS
Potential Damage to or Destruction of Previously Undiscovered Archaeological Sites or Tribal Cultural Resources	S	Mitigation Measure CR-2: Prepare an Archaeological Discovery Plan and an Archaeological Monitoring Plan Mitigation Measure CR-3: Conduct Cultural Resources Awareness Training	LTS

Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
		Mitigation Measure CR-4: Implement Procedures for Inadvertent Discovery of Cultural Material Mitigation Measure CR-5: In the Event that Tribal Cultural Resources are Discovered Prior to or During Construction, Implement Procedures to Evaluate Tribal Cultural Resources and Implement Avoidance and Minimization Measures to Avoid Significant Adverse Effects	
Damage to or Destruction of Human Remains during Construction	S	Mitigation Measure CR-4: Implement Procedures for Inadvertent Discovery of Human Remains	LTS

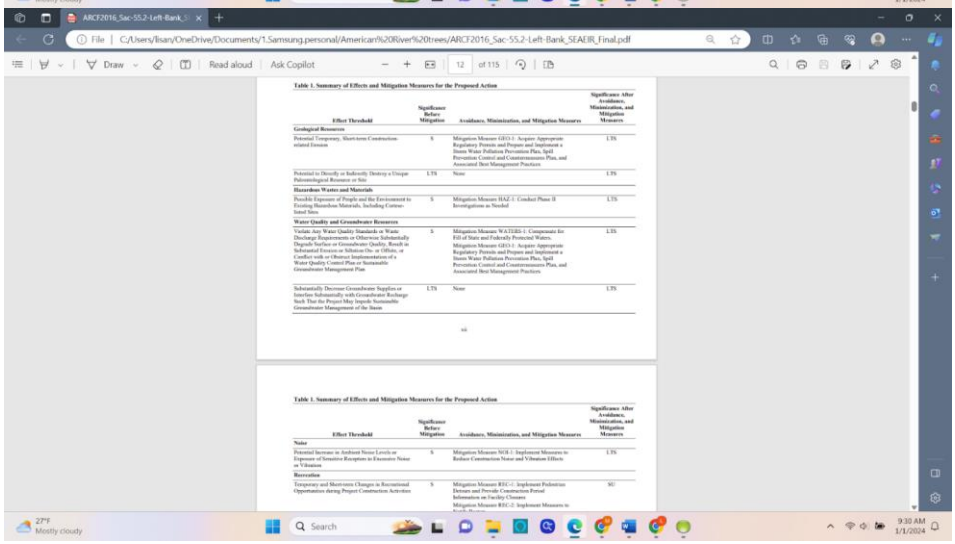

Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
Geological Resources			
Potential Temporary, Short-term Construction-related Erosion	S	Mitigation Measure GEO-1: Acquire Appropriate Regulatory Permits and Prepare and Implement a Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures Plan, and Associated Best Management Practices	LTS
Potential to Directly or Indirectly Destroy a Unique Paleontological Resource or Site	LTS	None	LTS
Hazardous Wastes and Materials			
Possible Exposure of People and the Environment to Existing Hazardous Materials, Including Contaminated Sites	S	Mitigation Measure HAZ-1: Conduct Phase II Investigations as Needed	LTS
Water Quality and Groundwater Resources			
Violate Any Water Quality Standards or Waste Discharge Requirements or Otherwise Substantially Degrade Surface or Groundwater Quality, Result in Substantial Erosion or Siltation On- or Offsite, or Conflict with or Obstruct Implementation of a Water Quality Control Plan or Sustainable Groundwater Management Plan	S	Mitigation Measure WATER-1: Compensate for Fill of State and Federally Protected Waters. Mitigation Measure GEO-1: Acquire Appropriate Regulatory Permits and Prepare and Implement a Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures Plan, and Associated Best Management Practices	LTS
Substantially Decrease Groundwater Supplies or Interfere Substantially with Groundwater Recharge Such That the Project May Impede Sustainable Groundwater Management of the Basin	LTS	None	LTS

Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
Noise			
Potential Increase in Ambient Noise Levels or Exposure of Sensitive Receptors to Excessive Noise or Vibration	S	Mitigation Measure NOI-1: Implement Measures to Reduce Construction Noise and Vibration Effects	LTS
Recreation			
Temporary and Short-term Changes in Recreational Opportunities during Project Construction Activities	S	Mitigation Measure REC-1: Implement Pedestrian Detours and Provide Construction Period Information on Facility Closures Mitigation Measure REC-2: Implement Measures to	SU

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9:29 AM 1/1/2024
27°F Mostly cloudy
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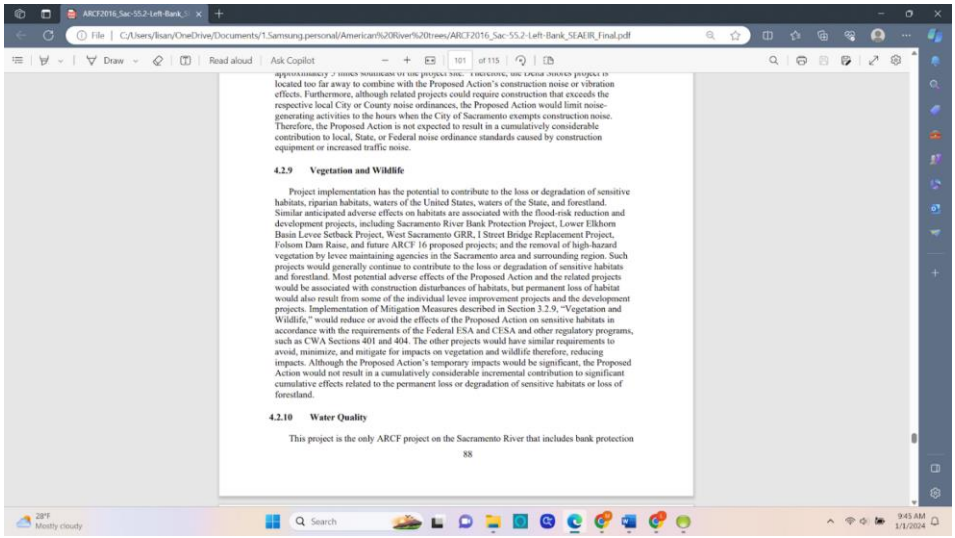
9:30 AM 1/1/2024



located too far away to combine with the Proposed Action's construction noise or vibration effects. Furthermore, although related projects could require construction that exceeds the respective local City or County noise ordinances, the Proposed Action would limit noise-generating activities to the hours when the City of Sacramento exempts construction noise. Therefore, the Proposed Action is not expected to result in a cumulatively considerable contribution to local, State, or Federal noise ordinance standards caused by construction equipment or increased traffic noise.

4.2.9 Vegetation and Wildlife

Project implementation has the potential to contribute to the loss or degradation of sensitive habitats, riparian habitats, waters of the United States, waters of the State, and forestland. Similar anticipated adverse effects on habitats are associated with the flood-risk reduction and development projects, including Sacramento River Bank Protection Project, Lower Elkhorn Basin Levee Setback Project, West Sacramento GRR, I Street Bridge Replacement Project, Folsom Dam Raise, and future ARCF 16 proposed projects; and the removal of high-hazard vegetation by levee maintaining agencies in the Sacramento area and surrounding region. Such projects would generally continue to contribute to the loss or degradation of sensitive habitats and forestland. Most potential adverse effects of the Proposed Action and the related projects would be associated with construction disturbances of habitats, but permanent loss of habitat would also result from some of the individual levee improvement projects and the development projects. Implementation of Mitigation Measures described in Section 3.2.9, "Vegetation and Wildlife," would reduce or avoid the effects of the Proposed Action on sensitive habitats in accordance with the requirements of the Federal ESA and CESA and other regulatory programs, such as CWA Sections 401 and 404. The other projects would have similar requirements to avoid, minimize, and mitigate for impacts on vegetation and wildlife therefore, reducing impacts. Although the Proposed Action's temporary impacts would be significant, the Proposed Action would not result in a cumulatively considerable incremental contribution to significant cumulative effects related to the permanent loss or degradation of sensitive habitats or loss of forestland.

4.2.10 Water Quality

This project is the only ARCF project on the Sacramento River that includes bank protection

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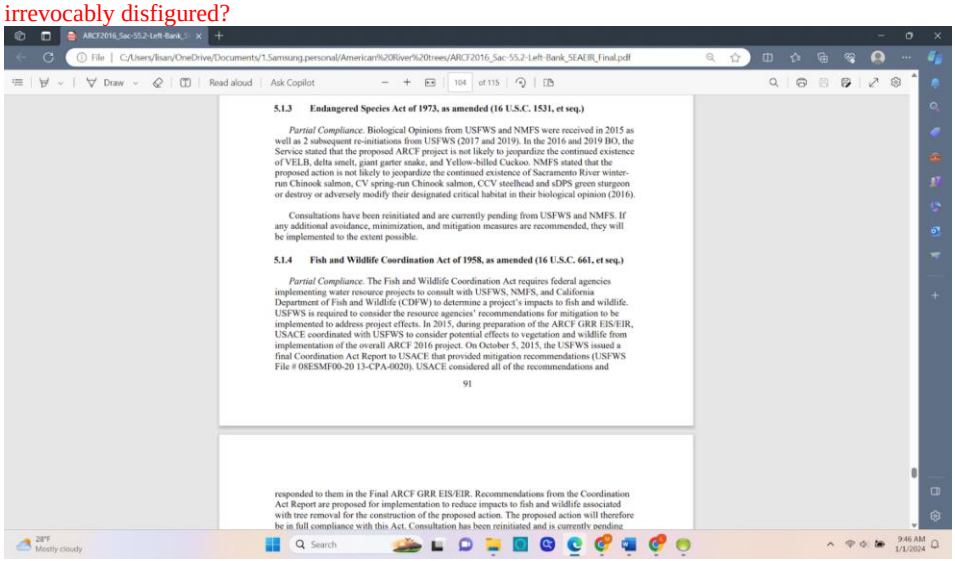
Only "partial compliance" ? How can you be in full compliance when identified Hawks and Eagles are trying to nest in area being disrupted and a historic location is going to be dug up and irrevocably disfigured?



5.1.3 Endangered Species Act of 1973, as amended (16 U.S.C. 1531, et seq.)

Partial Compliance. Biological Opinions from USFWS and NMFS were received in 2015 as well as 2 subsequent re-initiations from USFWS (2017 and 2019). In the 2016 and 2019 BO, the Service stated that the proposed ARCF project is not likely to jeopardize the continued existence of VELB, delta smelt, giant garter snake, and Yellow-billed Cuckoo. NMFS stated that the proposed action is not likely to jeopardize the continued existence of Sacramento River winter-run Chinook salmon, CV spring-run Chinook salmon, CCV steelhead and sDPS green sturgeon or destroy or adversely modify their designated critical habitat in their biological opinion (2016).

Consultations have been reinitiated and are currently pending from USFWS and NMFS. If any additional avoidance, minimization, and mitigation measures are recommended, they will be implemented to the extent possible.

5.1.4 Fish and Wildlife Coordination Act of 1958, as amended (16 U.S.C. 661, et seq.)

Partial Compliance. The Fish and Wildlife Coordination Act requires federal agencies implementing water resource projects to consult with USFWS, NMFS, and California Department of Fish and Wildlife (CDFW) to determine a project's impacts to fish and wildlife. USFWS is required to consider the resource agencies' recommendations for mitigation to be implemented to address project effects. In 2015, during preparation of the ARCF GRR EIS/EIR, USACE coordinated with USFWS to consider potential effects to vegetation and wildlife from implementation of the overall ARCF 2016 project. On October 5, 2015, the USFWS issued a final Coordination Act Report to USACE that provided mitigation recommendations (USFWS File # 08ESMF00-20 13-CPA-0020). USACE considered all of the recommendations and

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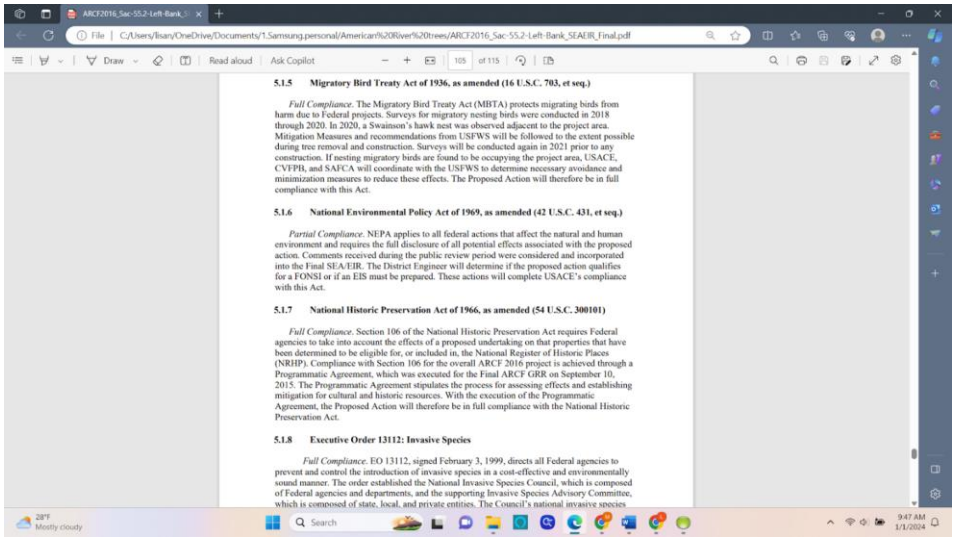
responded to them in the Final ARCF GRR EIS/EIR. Recommendations from the Coordination Act Report are proposed for implementation to reduce impacts to fish and wildlife associated with tree removal for the construction of the proposed action. The proposed action will therefore be in full compliance with this Act. Consultation has been reinitiated and is currently pending



5.1.5 Migratory Bird Treaty Act of 1936, as amended (16 U.S.C. 703, et seq.)

Full Compliance. The Migratory Bird Treaty Act (MBTA) protects migrating birds from harm due to Federal projects. Surveys for migratory nesting birds were conducted in 2018 through 2020. In 2020, a Swainson's hawk nest was observed adjacent to the project area. Mitigation Measures and recommendations from USFWS will be followed to the extent possible during tree removal and construction. Surveys will be conducted again in 2021 prior to any construction. If nesting migratory birds are found to be occupying the project area, USACE, CVFPB, and SAFCA will coordinate with the USFWS to determine necessary avoidance and minimization measures to reduce these effects. The Proposed Action will therefore be in full compliance with this Act.

5.1.6 National Environmental Policy Act of 1969, as amended (42 U.S.C. 431, et seq.)

Partial Compliance. NEPA applies to all federal actions that affect the natural and human environment and requires the full disclosure of all potential effects associated with the proposed action. Comments received during the public review period were considered and incorporated into the Final SEA/EIR. The District Engineer will determine if the proposed action qualifies for a FONSI or if an EIS must be prepared. These actions will complete USACE's compliance with this Act.

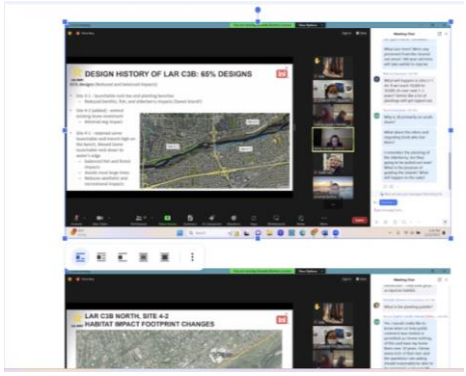
5.1.7 National Historic Preservation Act of 1966, as amended (54 U.S.C. 300101)

Full Compliance. Section 106 of the National Historic Preservation Act requires Federal agencies to take into account the effects of a proposed undertaking on that properties that have been determined to be eligible for, or included in, the National Register of Historic Places (NRHP). Compliance with Section 106 for the overall ARCF 2016 project is achieved through a Programmatic Agreement, which was executed for the Final ARCF GRR on September 10, 2015. The Programmatic Agreement stipulates the process for assessing effects and establishing mitigation for cultural and historic resources. With the execution of the Programmatic Agreement, the Proposed Action will therefore be in full compliance with the National Historic Preservation Act.

5.1.8 Executive Order 13112: Invasive Species

Full Compliance. EO 13112, signed February 3, 1999, directs all Federal agencies to prevent and control the introduction of invasive species in a cost-effective and environmentally sound manner. The order established the National Invasive Species Council, which is composed of Federal agencies and departments, and the supporting Invasive Species Advisory Committee, which is composed of state, local, and private entities. The Council's national invasive species

We request objective Peer review and further modification or elimination of any planned activities as intended for:



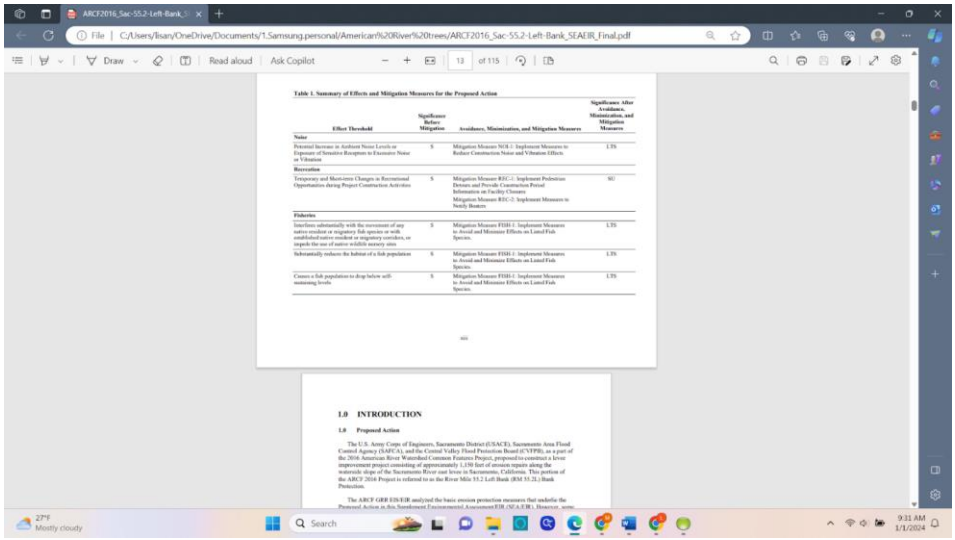


Table 1. Summary of Effects and Mitigation Measures for the Proposed Action

Effect Threshold	Significance Before Mitigation	Avoidance, Minimization, and Mitigation Measures	Significance After Avoidance, Minimization, and Mitigation Measures
Noise			
Potential Increase in Ambient Noise Levels or Exposure of Sensitive Receptors to Excessive Noise or Vibration	S	Mitigation Measure NOI-1: Implement Measures to Reduce Construction Noise and Vibration Effects	LTS
Recreation			
Temporary and Short-term Changes in Recreational Opportunities during Project Construction Activities	S	Mitigation Measure REC-1: Implement Pedestrian Detours and Provide Construction Period Information on Facility Closures Mitigation Measure REC-2: Implement Measures to Notify Boaters	SU
Fisheries			
Interferes substantially with the movement of any native resident or migratory fish species or with established native resident or migratory corridors, or impede the use of native wildlife nursery sites	S	Mitigation Measure FISH-1: Implement Measures to Avoid and Minimize Effects on Listed Fish Species.	LTS
Substantially reduces the habitat of a fish population	S	Mitigation Measure FISH-1: Implement Measures to Avoid and Minimize Effects on Listed Fish Species.	LTS
Causes a fish population to drop below self-sustaining levels	S	Mitigation Measure FISH-1: Implement Measures to Avoid and Minimize Effects on Listed Fish Species.	LTS

1.0 INTRODUCTION

1.0 Proposed Action

The U.S. Army Corps of Engineers, Sacramento District (USACE), Sacramento Area Flood Control Agency (SAFCA), and the Central Valley Flood Protection Board (CVFPB), as a part of the 2016 American River Watershed Common Features Project, proposed to construct a levee improvement project consisting of approximately 1,150 feet of erosion repairs along the waterside slope of the Sacramento River east levee in Sacramento, California. This portion of the ARCF 2016 Project is referred to as the River Mile 55.2 Left Bank (RM 55.2L) Bank Protection.

The ARCF GRR/EIS/EIR analyzed the basic erosion protection measures that underlie the Proposed Action in this Supplement Environmental Assessment/EIR (SEA/EIR). However, some

Supplemental SEIR continues to admit:

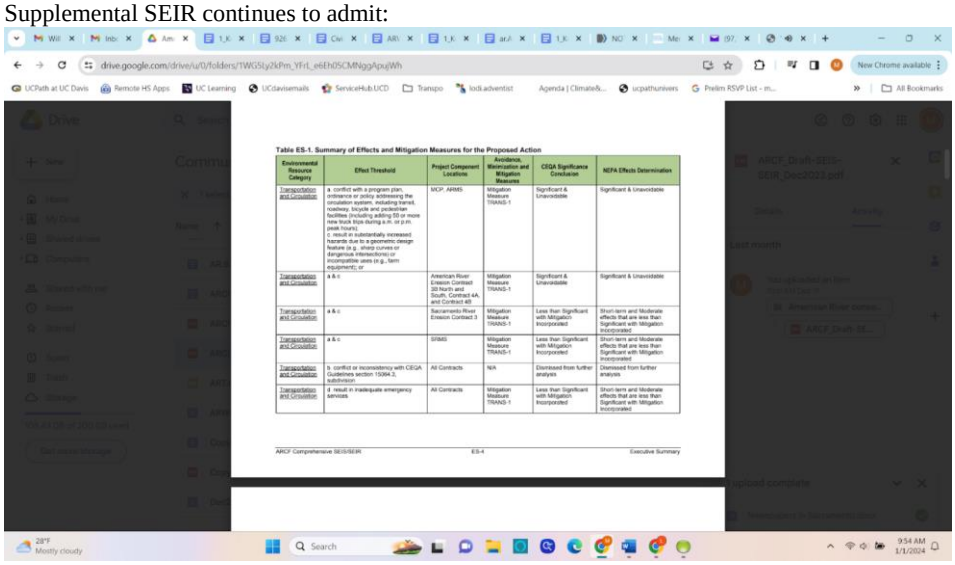


Table ES-1. Summary of Effects and Mitigation Measures for the Proposed Action

Environmental Resource Category	Effect Threshold	Project Component Locations	Avoidance, Minimization and Mitigation Measures	CEQA Significance Conclusion	NEPA Effects Determination
Transportation and Circulation	a. conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities (including adding 50 or more new truck trips during a.m. or p.m. peak hours);	MCP, ARMS	Mitigation Measure TRANS-1	Significant & Unavoidable	Significant & Unavoidable
Transportation and Circulation	a & c	American River Erosion Contract 3B North and South, Contract 4A, and Contract 4B	Mitigation Measure TRANS-1	Significant & Unavoidable	Significant & Unavoidable
Transportation and Circulation	a & c	Sacramento River Erosion Contract 3	Mitigation Measure TRANS-1	Less than Significant with Mitigation Incorporated	Short-term and Moderate effects that are less than Significant with Mitigation Incorporated
Transportation and Circulation	a & c	SRMS	Mitigation Measure TRANS-1	Less than Significant with Mitigation Incorporated	Short-term and Moderate effects that are less than Significant with Mitigation Incorporated
Transportation and Circulation	b. conflict or inconsistency with CEQA Guidelines section 15064.3, subdivision	All Contracts	N/A	Dismissed from further analysis	Dismissed from further analysis
Transportation and Circulation	d. result in inadequate emergency services	All Contracts	Mitigation Measure TRANS-1	Less than Significant with Mitigation Incorporated	Short-term and Moderate effects that are less than Significant with Mitigation Incorporated

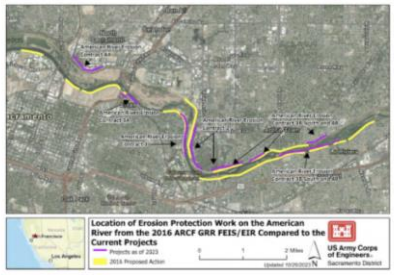


Figure 3.5.2-1. Previously Analyzed and Currently Proposed American River Erosion Protection Sites

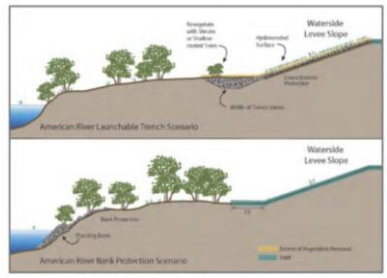
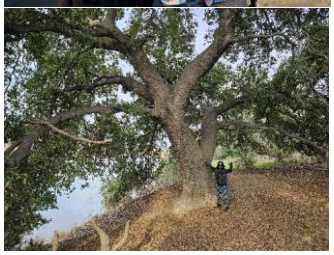


Figure 3.5.2-2. Launchable Trench and Bank Protection Designs

ARCF Comprehensive SEIS/SEIR 3-26 Description of Project Alternatives

The following are photos and general questions .



high water

dry

Last winter the water was elevated and covering the trail behind where I am standing in this picture. With the wide berm, trees, there was very slow or almost no flow. See how placid it is in the photo above.

Once the surge stopped, the levels receded quickly, sucked up by the well established vegetation, none of which was lost even though several feet of trunks were submerged during the event.

This has been repeatedly observed throughout the years.

I have walked this trail over 35 years

Part of the beauty is the timeless unchanging nature, hard clay, no erosion.

Compare proposed well vegetated and armored 3B on the chopping block for clear cutting in area previously reinforced, stable, previously noted not requiring intervention

with area of intervention near Sac State with sandy already eroding areas, and still not growing in vegetation, no trees in sight, grasses not taking, soft, sandy hard to walk on unsightly soft muddy wasteland barren regions.

13 What was the justification of cutting well established trees BEHIND the levee? How sad and unseemly and now will be termite palaces, eroding the previous armoring root systems of beautiful shade rendering, carbon neutralizing tree cover that also helped neutralize toxics and air pollution from heavily trafficked H Street bridge. Yet a small band of trees was kept on the ridge at back of the

park for "park like" esthetics? But that doesn't work because the fences, barriers, greatly limit access and are further visually unappealing.

Additional Questions:

Please explain:

https://www.noaa.gov/sites/default/files/legacy/document/2020/Oct/07354626787.pdf

What is the status of 10-15 year monitoring?

" In 2003, the Corps worked with local, state, and federal agencies to develop a project that established approximately 650 linear feet of shaded riverine aquatic (SRA) habitat at RM 2.4L. The habitat is now under active maintenance by a landscaping contractor and this site will be monitored for 1 0–15 years after planting. "•

Engineering and Hydrology Concerns:

13 cont. *In stark contrast to other sections of river, this basically straight section has proven to resist observable erosion or scour during flood control releases comparable to the new 160 kcfs emergency design flow (eg, 1964's 115 kcfs, 1986's 134 kcfs, 1997's 110 kcfs, & 2017's 80 kcfs releases), as witnessed by local residents and river experts. For this stretch, what, if any, physical observations or measurements does USACE have of either river velocities or erosion at or near the river bank (eg, photographs, video, velocity measurements), or is USACE relying entirely or almost entirely on model simulation output for this large scale tree and habitat removal project?*

14 *Please explain if the modelling of Safca and observed river behavior demonstrates low flow rates along the border of the river, what modelling is being used to justify high flow velocity requiring erosion control?*

15 *Safca Modelling at new maximum flow 160 shows that velocities along the edge of the bank during high water events is extremely slow 0-2ft/second,That is not considered enough to cause erosion , so how can you explain why that makes the bank is more susceptible to erosion to justify removing 500 trees?*

History and modern numerical flow modeling both show that removal of vegetation, or roughness, along river banks increases river velocity at the river banks. If flow velocities at the river bank increase after vegetation and tree removal, won't that worsen the erosion conditions for the river banks, including any habitat or soil above the riprap?

16 *Please explain the logic that your plan calls for development of planting benches that fall in to launchable rock toes, yet you are removing trees and vegetation and then having to replant them in sandy soil, how will this impact heat island effect and habitat interim and long term stability?*

RECREATION CONCERNS:

The American River Parkway is a highly visited "Wild and Scenic Area" attracting more visitors than Yosemite National Park annually. Thousands of birdwatcher and other nature lovers from around the world come to visit.

How will the sharp rocky installations impact recreational activities and access such as kayaking, fishing, wading?

17

How many linear feet of shoreline will be removed from public access after you install the launchable rock toes, planting benches, and bank armoring with very sharp rocks of unknown source in area 3B?

Will there be more toxic serpentine laden rocks for this infill?

How will this, along with loss of shade, usual habitat and general disruption, impact the beleaguered Salmon life cycle and waterfowl and other wildlife?

Research has linked exposure to trees to both physical and mental restoration. For example, a number of studies have found that exposure to urban forests generally reduces mental and physical stress, anxiety, and depression, and that they improve moods.

How will removal of 500 heritage oak trees impact wildlife as well as the mental health of human visitors? Trees provide several benefits that relate to well-being. Research has also found that tree canopy cover significantly contributes to neighborhood social connection and social support, both important to mental well-being.

The study authors, Thomas Astell-Burt, Ph.D. and Xiaoqi Feng, Ph.D. with the University of Wollongong, in New South Wales, Australia,

EPA/CLIMATE/EQUITY QUESTIONs:

https://www.epa.gov/heatislands/heat-island-compendium

18

Evidence from other similarly mitigated habitats shows that a half century later, there remains substantial habitat loss. How will we be reaching the EPA goal of reducing heat islands by cutting trees and clearing vegetation with anticipated several years delay before partial restoration might possibly be achieved?

What protection or mitigation can be provided to the Tile 1 Elementary School locate in the epicenter of this intended work? How will school children be able to concentrate with substantial noise pollution? Will you be providing Ear protection to mitigate the

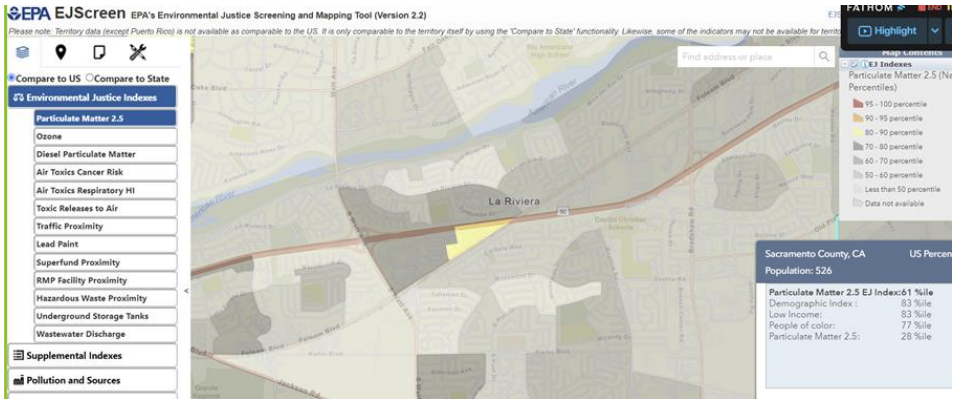
hearing loss and headaches? Will you be providing Hepa Filters and other anti-pollution devices or measures to protect them in their classrooms?

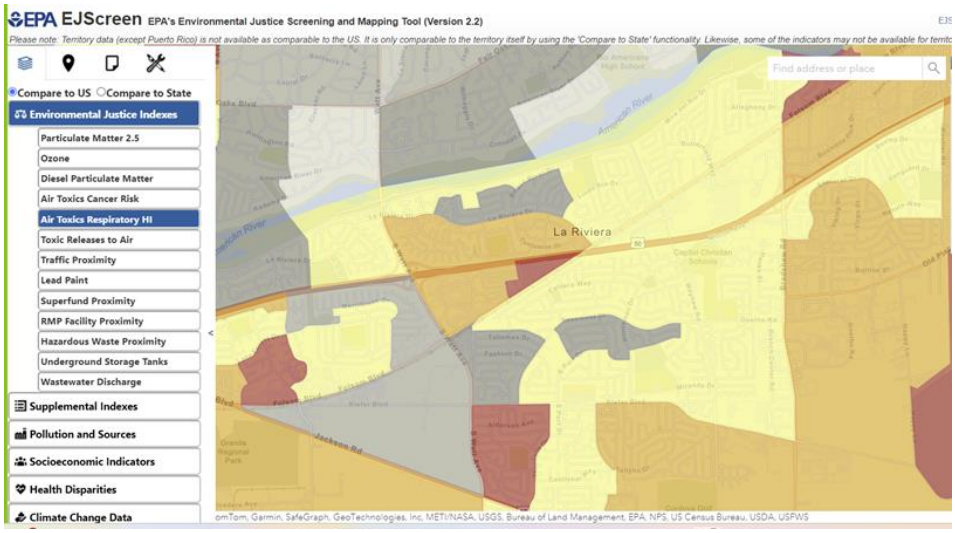
We know from 2017 SMUD report Page 28 specifies the amount of carbon storage in Sac County that forests provide - there is an associated map that identifies the forested area as basically the Blue Oak Woodlands in the Southeast County. There is another section starting on page 41 - Urban Forestry that details additional carbon capturing benefits within the urban areas.

Page 28,
3.1 CURRENT INVENTORY AND FORECAST SCENARIOS

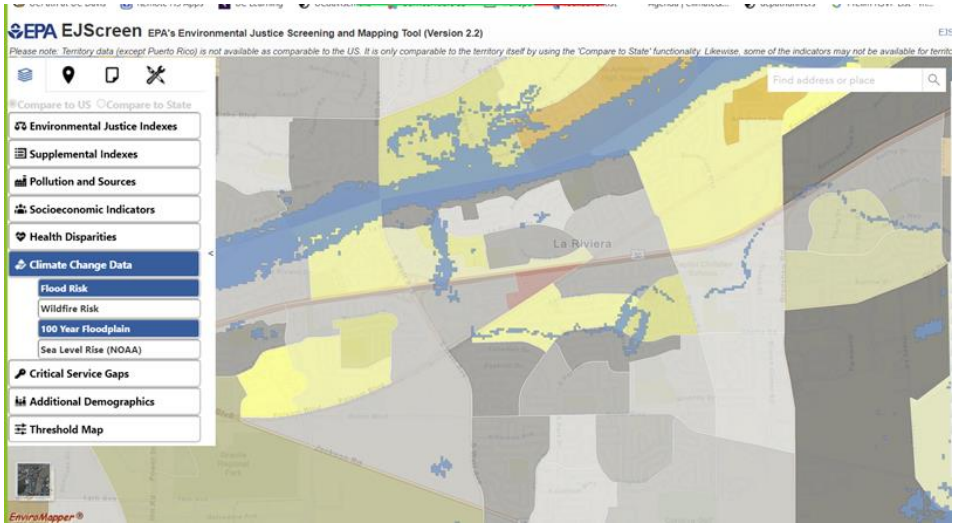
The results of the carbon inventory reflect that there is a substantial quantity of carbon sequestered by lands in Sacramento County. Based on LANDFIRE 2014, Sacramento County lands held roughly 36.3 million MTCO2e in aboveground biomass, belowground biomass, and soils. General agriculture, shrublands and urban areas make up a majority (approximately 80 percent) of landscape carbon in the 2014 inventory (Figure 14). Forests and grasslands consist of about 16 percent of the landscape carbon in the county with the rest of the LULCs accounting for approximately 3 to 4 percent of the inventory. These results are intuitive given that urban, agriculture and shrubland areas dominate the acreage of the county. Furthermore, although forests only make up approximately 3 percent (Figure 15) of county acreage, their high biomass and soil carbon sequestration rates cause them to account for 8 percent of the 2014 inventory (Figure 14).

It is a move backward to deforest when history has demonstrated deforested regions were MOST susceptible to flooding, and we know forested regions have lower temperature, better air cleaning capacity and water saturation recovery and are more beautiful and offer needed shade for the wildlife on land and in the waters.



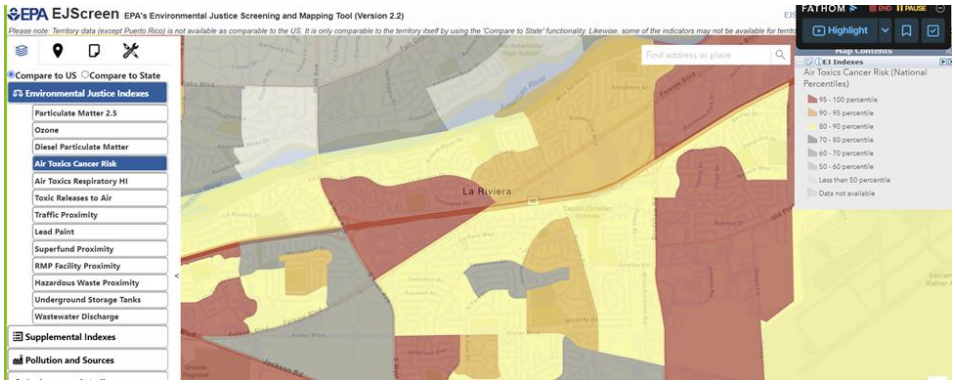


Lower risk particulate matter by river, higher by Watt and Rt 50



100 yr flood risk minimal along our portion of levee

Commented [1]: My opinion is EPA is not up to date on the latest and greatest analyses USBR/NOAA/DWR/USACE have done considering various duration 100/200/1000-yr events and how Folsom would be able to dampen them, so I'd say to not bring this one up.



Note baseline Air toxics risk 95-100% along rt 50, watt corridor, 80th % along South side river, 70th along North Side in areas of planned interventions.

How much will this further exceed EPA standards with as yet not clearly designated staging, heavy equipment maneuvering and staging, potential compromise of Levees with situation of said equipment and accompanying noise, vibration, heavy exhaust compromising residents and habitat along the 3B corridor.

There appears to be a baseline protective effect of the river parkway heavily forested habitat, with natural mitigation of effects of high volume traffic areas high toxics cancer risk along Rt 50 Corridor and Watt Avenue which are at the 95-100% percentile on the EJ Screening tool, but reduced to the 80th percentile closer to the river, what is the predicted impact of this project on heat, air quality, fine particulates, increased cancer risk and risk of aggravation of respiratory disorders.

My daughter lives with lung cancer, the last thing we need is for her to be exposed to increased fine particulates and fugitive dust. What will you do to protect her health and the health of other vulnerable members of our community not only from the intended demolition, but which shall be forever impacted for our lifetimes once the trees are gone?.

The anticipated devastation that contract 3B North and South of the American River Watershed Common Features Project proposes for over a mile of the Riparian Habitat will be a costly loss to the regional ecosystem. Since California became a state in 1850, riparian forest in the Sacramento Valley has declined more than 98% from 800,000 acres to less than 14,000
(Stephen Johnson, Gerald Haslam, and Robert Dawson, *The Great Central Valley: California's Heartland*, p. 96). This rare treasure including trees protected by local ordinances, within urban Sacramento County must be preserved and protected, not decimated due to lack of careful consideration of risks vs benefits.
In same way we now know physiatrists obtain far better outcomes in function, symptom management and return to productive lifestyle for people with spinal conditions than any other specialty, including spine

surgeons, we must take into consideration the power of working With the River and it's natural resources, not AGAINST it.

Thus I urge the Army Corps to reconsider and cease and desist the pending work in areas 3B North and South of the American River.

Respectfully submitted,

Lisa Merritt MD
Executive Director, MHI

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 1:49 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
Attachments: ACOE Comment Letter Final.pdf

From: Laurie Weir <laurieweir@comcast.net>
Sent: Friday, February 23, 2024 7:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Laurie Weir <laurieweir@comcast.net>
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 the immediate past president of the American River Natural History Association. The Association is a long standing non-profit whose mission is: To provide opportunities for the visitor that will promote awareness, appreciation, understanding and enjoyment of the natural and cultural resources of the Sacramento Region. The Natural History Association manages the Effie Yeaw Nature Center, and is one of the largest providers of environmental education in the Sacramento metropolitan area.

My husband, Jacek Lisiewicz and I have lived over 20 years within minutes of the American River Parkway in Carmichael, California and are long time members of the Carmichael Colony Neighborhood Association.

Over the past several years, I have worked with and observed the work of the Water Forum. The Water Forum has accomplished large scale projects in multiple locations along the American River Parkway that provide salmon spawning and importantly salmon rearing habitat. This work has educated many, many Sacramento residents on the importance of providing varied river shorelines planted with native species, that allow salmon and other wildlife habitat that is

critical to the viability of their species. It is clear that carefully varied, planted, and managed river edges are critical to the sustainability of multiple species that are native to the Parkway.

I am aware of other comments submitted to you voicing concern over the Army Corp's current approach to the Lower American River. I echo Edward Smith's comments (see below) on the erosion control plan for the lower American River.

1 I am deeply concerned that the Army Corps Of Engineers is not taking a more thoughtful approach to the protection of the lower American River. I ask that you stop the current proposed project and work with environmental and community leaders, including members of native tribes with deep historical roots along the American River.

The Army Corps Of Engineers has the opportunity to make a huge difference in how critical animal species, and people, will interact with the American River for years to come. Nothing is set in stone, including your current erosion control plans for the American River. Please take advantage of this important opportunity to change your plans to make a positive difference to improve the environmental sustainability of the American River.

Thank you very much,

Laurie Weir

Edward Smith's Email:

> I am alarmed to learn the Army Corps of Engineers (ACE) is planning to proceed with extreme, so-called "erosion protection" measures across more than six miles of riparian area in the lower American River (hereinafter, "LAR"). While the ecosystem restoration community, including several of your own staff and federal agency acknowledge the value of a more effective and less destructive approach to erosion prevention and protection through engineering with nature strategies (https://ewn.erdc.dren.mil/), this project chooses to ignore its own science under the banner of expediency or because "Congress asked us to move ahead." To hear last night (2/22/24) on the news from the ACOE that citizens of the area "just need to be educated" is an insult to our intelligence and sophistication.
>
> Thank you for considering the attached ten pages of comments.
>
> Sincerely,
>
> Edward Smith
> Carmichael-by-the-River

Edward Bennett Smith

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

Date: 2/22/2024

Dear Staff of the US Army Corps of Engineers (ACE) and Department of Water Resources (DWR):

My comments focus on the lower American River (LAR) components of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B which are proposed to be installed in 2025 and 2026.

A To establish my credibility, I am a 27-year career Senior Regional Scientist for The Nature Conservancy and Vice President of the Board of Directors for the American River Natural History Association and Effie Yeaw Nature Center. However, all of the views, opinions and comments represented by this letter are my own and come from me as a citizen of Sacramento County for the past 10 ½ years.

My wife and I live within ½ mile of the American River in Carmichael, and on a daily basis enjoy the peace, tranquility and conservation and recreational services provided by this beautiful reach of the lower American River and its aquatic habitat and riparian woodlands, grasslands and forests. We enjoy hiking, researching, birdwatching, kayaking, swimming, snorkeling, bike riding and simply sitting and people-watching along the banks of the American River, from the city of Sacramento to Folsom in the American River Parkway, City, Regional and State Parks and Wild and Scenic areas on both banks of the river.

B I am alarmed to learn the Army Corps of Engineers (ACE) is planning to proceed with extreme, so-called “erosion protection” measures across more than six miles of riparian area in the lower American River (hereinafter, “LAR”). While the ecosystem restoration community, including several of your own staff and federal agency acknowledge the value of a more effective and less destructive approach to erosion prevention and protection through engineering with nature strategies (https://ewn.erdc.dren.mil/), this project chooses to ignore its own science under the banner of expediency or because “Congress asked us to move ahead.”

For the Final SEIS/SEIR, please consider analyzing a more complete range of effective and less destructive erosion protection strategies more in alignment with the latest science and technology available to incorporate. Our community deserves better.

The overarching intention of my letter is to encourage ACE to work with interested community and academic stakeholders to revise the current proposed action and find a tried and true set

of solutions that are acceptable to all and avoid a costly and time-consuming legal battle that will delay implementing important and effective erosion reduction strategies, while enhancing the scenic, recreational and conservation values of the riparian forest and woodlands along the LAR.

C **The Alternatives presented in the draft SEIS/SEIR do not adequately address the reasonable full range of activities required under NEPA and CEQA and are thus in violation of these acts.**

However, as this is only a draft, I strongly encourage you to address these shortfalls, with concomitant public meetings and design workshops. I would be happy to help with this effort.

D The American River Parkway and its woodlands and wildlife are extremely valuable to me. As I mentioned previously, my wife and I live within ½ mile of the American River in Carmichael, and on a daily basis enjoy the peace, tranquility and conservation and recreational services provided by this beautiful reach of the lower American River and its aquatic habitat and riparian woodlands, grasslands and forests. We enjoy hiking, researching, birdwatching, kayaking, swimming, snorkeling, bike riding and simply sitting and people-watching along the banks of the American River, from the city of Sacramento to the City of Folsom in the American River Parkway, City, Regional and State Parks and Wild and Scenic areas on both banks of the river.

I have reviewed the documents supplied by USACOE and my interpretation of your data and that of your consultants indicates to me that I do not support the preferred selection of utterly

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"necessary" for (or would even actually improve) flood safety along this section of the American River, let alone downstream water quality impacts to several species of federally listed, candidate and species of conservation concern, as well as CA state listed and protected species of fish and other wildlife in the American and Sacramento Rivers and the San Francisco Bay and Delta.

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.

F **My reading of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B are in violation of the Administrative Procedure Act ("APA"), 5 U.S.C. §§ 701–706, and in violation of meeting either the letter or intent of the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 et Case: 3:21-cv-00306, and possibly Section 404 of the Clean Water Act ("CWA"), 33 U.S.C. § 1344, and Section 7 of the Endangered Species Act ("ESA"), 16 U.S.C. § 1536(a)(2), and corresponding administrative rules. ACE and DWR may also be vulnerable to the citizen suit provision of the ESA, 16 U.S.C. § 1540(g), for Defendants' violations of Section 7 of the ESA, 16 U.S.C. § 1536(a)(2). If allowed to proceed, the draft SEIS/SEIR, particularly Contracts 3B, and**

4A and 4B will have significant negative immediate and cumulative impacts on protected "waters of the United States," both direct and indirect, as well as on wildlife, outdoor recreation, protected public lands, private conservation lands, family farms, and property values.

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. For example, in a study commissioned by the American River Flood Control District & Sacramento Area Flood Control Agency (MBK Associates 2018), the consultants identified seven areas along the LAR that could be vulnerable to erosion during flood events. Over this 11-mile stretch, which is beyond the scope of the current ACE and DWR draft SEIS and SEIR, there is far fewer than six miles of LAR in need of extreme bank hardening (Figure 1).

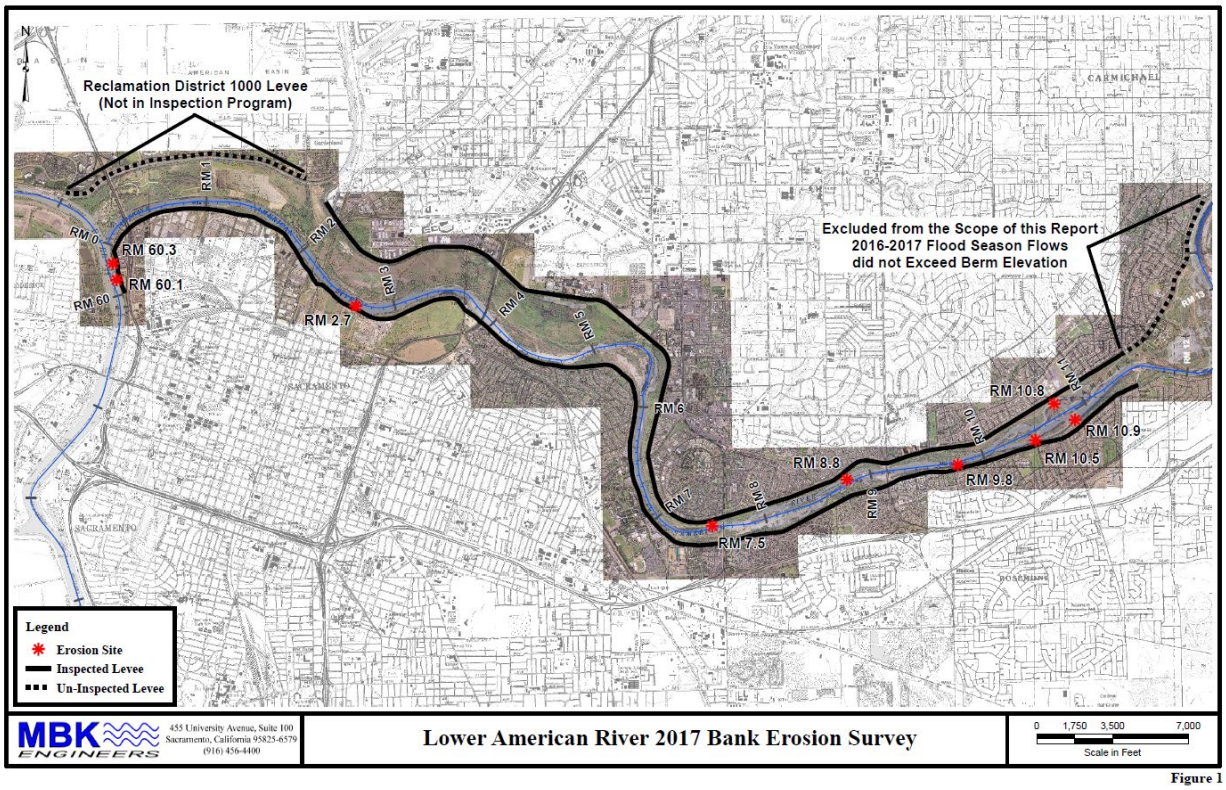
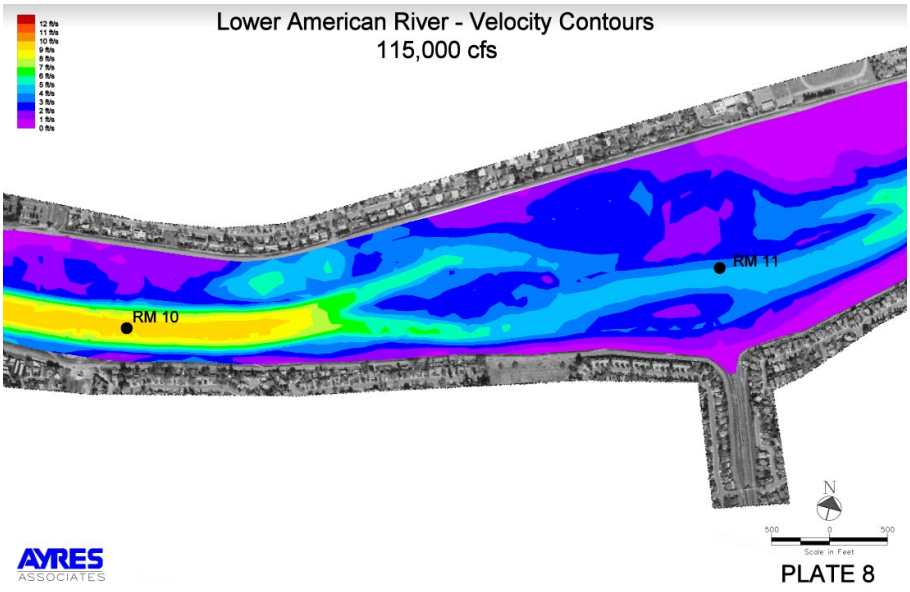


Figure 1 Potential erosion sites identified along the LAR by MBK Associates (2018).

The velocity contours for two flood stage flows in the Ayres Associates' report show that the bank velocities are much lower (1-6 fps) in Figure 2, with shear stress at or below tolerance of intact vegetation ranging from turf grasses to intact native hardwood vegetation (Figure 3).



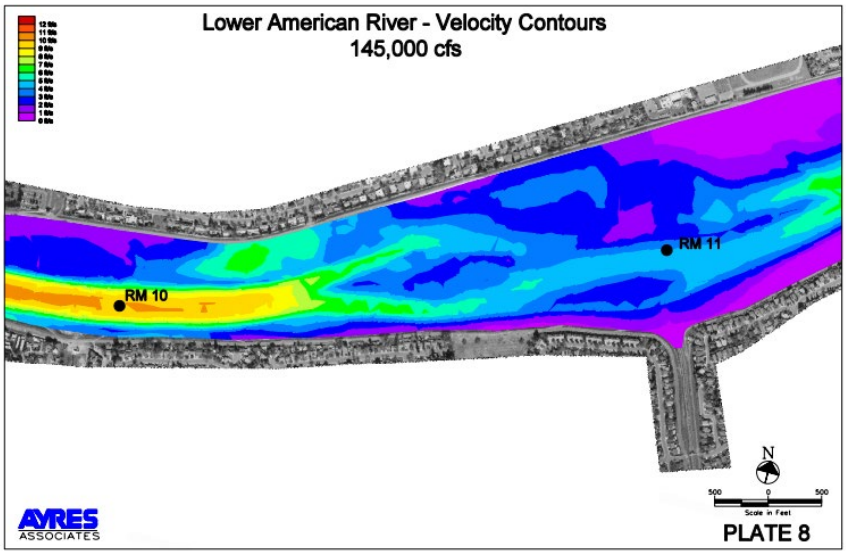


Figure 2 Modeled river velocity contours for specific reaches of the LAR (river mile 10 to river mile 11) by Ayres Associates (2017)

Table 4-4. Permissible shear and velocity for selected lining materials (Fischenich 2001)

Permissible Shear and Velocity for Selected Lining Materials[1]

Boundary Category	Boundary Type	Permissible Shear Stress (lb/sq ft)	Permissible Velocity (ft/sec)	Citation(s)
Soils	Fine colloidal sand	0.02 - 0.03	1.5	A
	Sandy loam (noncolloidal)	0.03 - 0.04	1.75	A
	Alluvial silt (noncolloidal)	0.045 - 0.05	2	A
	Silty loam (noncolloidal)	0.045 - 0.05	1.75 – 2.25	A
	Firm loam	0.075	2.5	A
	Fine gravels	0.075	2.5	A
	Stiff clay	0.26	3 – 4.5	A, F
	Alluvial silt (colloidal)	0.26	3.75	A
	Graded loam to cobbles	0.38	3.75	A
	Graded silts to cobbles	0.43	4	A
	Shales and hardpan	0.67	6	A
Gravel/Cobble	1-in.	0.33	2.5 – 5	A
	2-in.	0.67	3 – 6	A
	6-in.	2.0	4 – 7.5	A
	12-in.	4.0	5.5 – 12	A
Vegetation	Class A turf	3.7	6 – 8	E, N
	Class B turf	2.1	4 - 7	E, N
	Class C turf	1.0	3.5	E, N
	Long native grasses	1.2 – 1.7	4 – 6	G, H, L, N
	Short native and bunch grass	0.7 - 0.95	3 – 4	G, H, L, N
	Reed plantings	0.1-0.6	N/A	E, N
	Hardwood tree plantings	0.41-2.5	N/A	E, N
Temporary Degradable RECPs	Jute net	0.45	1 – 2.5	E, H, M
	Straw with net	1.5 – 1.65	1 – 3	E, H, M
	Coconut fiber with net	2.25	3 – 4	E, M
	Fiberglass roving	2.00	2.5 – 7	E, H, M
Non-Degradable RECPs	Unvegetated	3.00	5 – 7	E, G, M
	Partially established	4.0-6.0	7.5 – 15	E, G, M
	Fully vegetated	8.00	8 – 21	F, L, M
Riprap	6 – in. d_{50}	2.5	5 – 10	H
	9 – in. d_{50}	3.8	7 – 11	H
	12 – in. d_{50}	5.1	10 – 13	H
	18 – in. d_{50}	7.6	12 – 16	H
	24 – in. d_{50}	10.1	14 – 18	E

Figure 3 Lining Materials and their permissible shear stress and river velocities.

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, using appropriately sited lining materials such as undisturbed hardwood riparian and other vegetation strategies identified in Figure 3.

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. This is a blatant example of not using the best available science and violates the Administrative Procedure Act (“APA”), 5 U.S.C. §§ 701–706, and is in violation of meeting either the letter or intent of the National Environmental Policy Act (“NEPA”), 42 U.S.C. § 4321 et Case: 3:21-cv-00306, and possibly Section 404 of the Clean Water Act (“CWA”), 33 U.S.C. § 1344, and Section 7 of the Endangered Species Act (“ESA”), 16 U.S.C. § 1536(a)(2), and corresponding administrative rules.

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.

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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 to flooding and erosion, not less. The proposed approach is just as likely if not more likely to put us at risk in higher water flows as conducting 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 [31,300 cfs over March 10-15, 2023]).

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, and the downstream effects of silt and water turbidity on listed species have not been disclosed.

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 more fine-grained, "surgical approach", not miles of bulldozing, is the only acceptable option, and only where data justify the need. The USA taxpayers do not like to throw away good money after poorly spent dollars, and Congress also would not support such a boondoggle. However, they will be notified.

I am personally very worried about being able to kayak and swim safely in the LAR anywhere above or adjacent to where the proposed activities would be installed. 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.

H **In the 2016 GRR comment responses, ACE said they would minimize impacts to vegetation, but stretches near River Park were denuded with removal of all vegetation. Will the Contract 3B area be clearcut too? Your track record in this area is abysmal, and the practice of Adaptive Management would require you to learn from your mistakes.**

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-sourced 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. These cumulative impacts have not been adequately addressed in the draft SEIS/SEIR in violation of the Administrative Procedure Act ("APA"), 5 U.S.C. §§ 701–706, and in violation of meeting either the letter or intent of the National Environmental Policy Act ("NEPA"), 42 U.S.C. § 4321 et Case: 3:21-cv-00306, and possibly Section 404 of the Clean Water Act ("CWA"), 33 U.S.C. § 1344, and Section 7 of the Endangered Species Act ("ESA"), 16 U.S.C. § 1536(a)(2), and corresponding administrative rules.

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.

Finally, it is unclear to me how well the proposed project and its impacts have been discussed with Native American Tribes, and the tradeoffs between the proscribed measures versus more nature-based design strategies disclosed. What impacts will be revetment have on cultural sites? Have all areas been surveyed completely? Is this project in compliance with the American Antiquities Act?

Thank you for the opportunity to comment. I look forward to hearing from you and working toward a more complete range of alternative actions to safeguard the health and prosperity of the Lower American River and all of its inhabitants.

Sincerely,

Edward Bennett Smith

Carmichael, CA

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:32 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: Comments Re: American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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From: David Ingram <David@tennantingram.com>
Sent: Friday, February 23, 2024 4:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Re: 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 wish to direct these comments to the draft SEIS/SEIR documents concerning the lower American River projects, 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. Not only has it provided a lifetime of recreational enjoyment for myself and my family, I have spent a good portion of the past 3 years heavily involved in volunteer efforts to clean it up after decades of unchecked abuse. My passion for restoring and protecting the Parkway erupted a couple of years ago, leading to my decision to become a Board Member with the **Sacramento Area Creeks Council**. Moreover, in January 2023, I joined 3 amazing friends and volunteer comrades in launching **River City Waterway Alliance**. In only 13 months, this volunteer group has hosted 360 waterway cleanups in the Sacramento area and removed a whopping **1,236,500 pounds of trash**.

As further background, I live on Garden Highway along the Sacramento River and experienced the Natomas Levee Improvement Project work right in my front yard. This allowed me to gain vast knowledge about these types of projects and witness first-hand the widely varying expert opinions regarding the impact of vegetation on levees. It's obvious, the science is not settled. Therefore, I strongly question whether the proposed "bank erosion" work is necessary along this section of the American River, and have concerns that the proposed approach of clear-cut, 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. Many qualified experts agree with my opinion, as I am sure you are all aware.

I do not support the devastating methods proposed to address potential bank erosion concerns. I fail to see how the environmental analysis adequately characterizes the significant impacts, or provides adequate mitigation. The analysis also fails to adequately consider feasible alternatives to the "unavoidable" impacts, including the consideration of alternative methods to achieve the Project's ultimate goals.

Under the California Environmental Quality Act (CEQA), even where impacts will remain "significant and unavoidable" after mitigation, CEQA still requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR fails to meet this requirement. The analysis of alternatives for a much more surgical, finely tuned approach (with less environmental impacts) are not presented.

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

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.

Thank you.

David Ingram

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:30 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

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From: Christie Vallance <christiev44@gmail.com>
Sent: Friday, February 23, 2024 4:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report 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.

1 Concern: I just noticed that in your authored book for International Guidelines on Nature and Nature Based Features for Flood Risk Management under your Engineering with Nature Program, a significant principle is to identify solutions that produce multiple benefits that "enhance quality of human life, advance social equity and increase environmental integrity" (p 23). Explain to the public how project 3b will implement this principal that you provide to your other projects?

Respectfully,

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:30 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Waterway destruction

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From: Brandt Holland <brandt1111@yahoo.com>
Sent: Friday, February 23, 2024 4:56 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Waterway destruction

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

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.

Brandt Holland

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:25 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca

From: Josh Thomas <joshjhthomas@gmail.com>
Sent: Friday, February 23, 2024 4:45 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, Ca

1 Jeffrey F. Mount, *California Rivers and Streams: The Conflict Between Fluvial Process and Land Use* (Berkeley: University of California Press, 1995), p. 105, 302, and 304.

viewed as composed primarily of the parent material or bedrock. The C horizon, which is usually light colored due to the absence of abundant organic material, is where the initial breakdown of the bedrock is occurring. In between the A and C horizons is the B horizon. Material leached from the A horizon by percolating water accumulates in the B horizon, collecting as pockets of clay-rich material. Since the material leached from the elluviation zone accumulates in the B horizon, it is known as the *illuviation* zone.

In perhaps the ultimate exercise in button-sorting known to the physical sciences, the soil scientists (or pedologists) have sliced up the soil classification pie into myriad, infinitesimal divisions. It would be pointless to review the entire soil classification scheme here. Explanation of even the simplest classification groups, like *intrazonal hydromorphic planosols*, is beyond the goals of this text. The U.S. Soil Conservation Service has created a complex hierarchical classification scheme that recognizes ten orders, twenty-nine common suborders, and innumerable great groups and subgroups. The combinations are endless and, except for experienced pedologists, complicated to use. Suffice it to point out that these combinations reflect a variety of physical and chemical characteristics of soils as well as the climate zone in which they develop.

It should be no surprise that soils in California vary greatly in their thickness, structure, and composition. Climate, vegetation, topography, bedrock, and time all play a role in the development of soils. In general, older soils from shallow slopes in wetter climates tend to be thick, organic-rich, and better developed. Younger soils from more arid climates with steeper topography are thinner, with more poorly developed layering (fig. 6.3). Most important for the rivers of California is the resistance of soils to erosion. Thick, well-developed soils that have well-established vegetative covers tend to be more resistant to erosion. The binding action of roots and clays along with high infiltration capacities increase a soil's resistance to erosion and reduce its contribution of sediment into rivers. Poorly developed, relatively thin soils, whether due to climate, bedrock, or bad land use practices, tend to erode quickly, producing high sediment yields.

HOW EROSION WORKS

The transfer of the by-products of physical and chemical weathering into California's rivers takes place primarily by direct runoff of rainfall. In many steep watersheds with highly unstable soils and bedrock, mass wasting processes (discussed below) may contribute significant amounts of sediment during and after large rainfall events. Snowmelt, groundwater discharge, and subsurface flow contribute only minor amounts of sediment to rivers in California.

Since a straightened river travels a shorter distance, the slope, velocity, and stream power of the river are increased. The break in slope at the upstream end of the straightened reach acts like a knickpoint. Increased competence and headward migration of this knickpoint can produce scouring upstream of the straightened channel; decline in competence that occurs at the downstream end of the straightened reach can lead to local deposition of material and aggradation of the channel, ultimately reducing its flow capacity.

Irrespective of changes in channel pattern or gradient, simply widening or deepening channel reaches to accommodate larger flows can also trigger numerous hydraulic changes that may ultimately undo the original alterations. Enlarged channels are usually designed to handle a specific, very large flow. During the design phase the impact of lower discharge flows is commonly ignored since they will clearly be contained by the channel. Yet the size and shape of a natural river channel is a product of the more frequent, intermediate flows associated with bankfull stage conditions, not the very large or extreme event. An increase in a channel's cross section through dredging produces a decline in the competence of these intermediate flows, because velocity and overall stream power are decreased. In this way, the channel is not capable of handling the sediment load that is delivered to it, resulting in localized deposition. In most cases, the channel size will be reduced utnil a cross section capable of handling the sediment load is restored.

The pitfalls of channel modification are illustrated in urban areas throughout California. The San Lorenzo River, which runs through downtown Santa Cruz, illustrates this problem well (fig. 15.10). Widespread flooding in downtown Santa Cruz in 1955 created a demand for extensive flood control projects in the area. The U.S. Army Corps of Engineers proposed a series of levees and channel alterations that would afford the downtown area protection from the 100-year flood. The design developed by the corps was the blunt instrument approach most popular at the time. The San Lorenzo River channel was straightened and, more important, deepened and widened. All riparian vegetation was removed from the riverbanks to reduce roughness; channel walls were lined with concrete and riprap to enhance stability. This "new and improved" river became a nearly straight concrete ditch—the pinnacle of river engineering efficiency.

Fig. 15.10. Problems associated with channel modification along the San Lorenzo River in Santa Cruz. *Top*: Channel was dredged, straightened, and lined by the U.S. Army Corps of Engineers to increase flood capacity. *Bottom*: Channel aggradation within improved reach of river led to significant reduction in flow capacity. Up until recently, the city spent millions of dollars yearly to dredge the channel, only to have it refill during winter floods. Photographs from Griggs 1982.

Less than 10 years after completion of the project, the San Lorenzo River had attempted to restore its profile by filling this ditch with more than 12 million cubic feet of sediment. In the end, it was calculated that the channel could only handle the 25- to 30-year flood. Millions of dollars and the complete destruction of the river had provided little to no real improvement in flood protection. To deal with this, Santa Cruz initiated a very expensive maintenance program. Up until recently, every year, like swallows returning to San Juan Capistrano, D9 tractors rumbled into the San Lorenzo ditch to push the sediment around into little piles, hoping that the next winter's flows would scour it and move it away. Not surprisingly, during very high discharge events, such as occurred during 1982 and 1983, a great deal of the sediment *is* scoured, temporarily increasing the channel capacity. However, the amount of scouring does not substantially increase the capacity of the channel to handle extreme floods.

Impact of Levees

According to the Army Corps of Engineers, there are over 5,000 miles of levees in California. In the Sacramento/San Joaquin Delta alone, there are more than 1,100 miles of levees. These levees have turned out to be both a blessing and a curse. On the positive side, many levee projects have saved local communities from regular inundation and the associated Draconian restrictions of the National Flood Insurance Program. In addition, the nation's most productive agricultural region, the Central Valley, would be flooded on a regular basis were it not for the extensive levee system. This is especially true of the delta. As a result of intense farming and associated oxidation of peat-rich soils, the elevation of large tracts of land in the delta has been declining steadily. Today, thousands of acres of farmland lie as much as 15 feet below sea level. If there were no levees, the constant interaction between freshwater flowing in from the Sacramento and San Joaquin rivers and marine waters pushed inland by wind and tides would keep much of the region underwater all year, making it impossible to farm. In addition, the massive pumping of freshwater out of the delta into the Central Valley and State Water projects would be impossible without the levee system. Agriculture and urban development have benefited greatly from the leveeing of the rivers.

On the negative side, the proliferation of levees along California's rivers has enhanced flooding hazards in some areas. Moreover, even those levees that are carefully engineered and maintained by the corps will eventually fail. The concentrated destruction associated with these failures and the inherent difficulty in predicting failures can make levees an untrustworthy partner in flood management.

On Fri, Feb 23, 2024 at 4:34 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

2 O. S. Scheifele, 1928. "Protection of River Banks and Levees." *The Canadian Engineer.*

The Canadian Engineer

A Weekly Paper for Civil Engineers and Contractors

Protection of River Banks and Levees

Employment of Angular Submerged Willow Tree Planting to Stop Erosion and Slides of Earth Banks of Rivers, Canals, Lakes, Levees, Cuts and Fills, and for General Flood Control—Some Projects in Canada and the United States Described

By O. S. SCHEIFELE
Waterloo, Ont.

MANY civil engineers and engineers in the employ of governments, railroads and various other big corporations have been of great service in assisting to perfect a simple and natural process as a substitute for the many other methods, such as timber and sheet piling, concrete or stone, rip-rap, etc., to keep rivers, creeks, lakes and earth cuts within their present area or channel at a small cost.

To verify this, the writer will cite various individual contracts awarded under competitive bidding where outside contractors were privileged to bid on solution such as stone, rip-rap or concrete to comply with the laws of the corporations where no contract could be let for a patented system without competitive bidding.

Many engineers who will read this article will remember other articles published during the last four years detailing the theory of planting willow logs or poles in trenches in a horizontal or angular position in harmony with the slopes of a river or lake shore bank on a 3 to 1 or 45 degree angle with the result that a tree and root growth will develop the

FIG. 1—PROJECT ON MISSOURI RIVER, KANSAS CITY DISTRICT

FIG. 2—MISSISSIPPI RIVER PROJECT
Illustration Shows Original Formation Along Bank of River Near Dubuque, Iowa

FIG. 3—MISSISSIPPI RIVER PROJECT
Willow Poles 40-ft. Long in Position to be Protected With Brush, Stones and Wire Fencing

Digitized by Go

entire length of each pole planted whether it be 5 or 50 ft. long. This gives many advantages over individual vertical tree planting to reinforce an earth slope.

Advantages Over Vertical Tree Planting

First. For example, the poles are applied on a lake shore or river bank, the butt end of the pole being set into the river bottom or beach at toe of incline bank in harmony with

FIG. 4—MISSISSIPPI RIVER PROJECT
Brush Mattress for Protection of Willow Poles and Bank

the desired slope with the result that the tree growth cannot slide and will immediately assist to prop and support in giving the bank the proper slope and rigidity.

Second. Where logs are placed along a water course at approximately 4-ft. intervals, the ice and water are greatly hindered from creating a straight hedge after the desired slope is made.

Third. A joint row of trees 40 ft. in length growing on a 35 degree slope will never fall, roots and all, into the river.

Fourth. In the average soil formation it would be very difficult to grow an individual tree owing to lack of moisture 20 ft. above the water level. With the joint system of tree planting, the foot of the willow logs is constantly resting submerged below the low water mark, and owing to the joint circulation of a score of trees growing vertically from the willow log, the trees at the extreme upper part of the pole will grow quite as prolifically as those close to moisture.

FIG. 5—MISSISSIPPI RIVER PROJECT, ROCK ISLAND DISTRICT CONSTRUCTION NEAR DUBUQUE, IOWA

Fifth. The last and most valuable advantage is shown on many water courses such as the Mississippi, Missouri and Gatineau Rivers, and others which have their source in the mountains or in the extreme north and which have an annual second flood in late May or June when the growing season is on. Tree and vegetation growth are drowned between the ordinary water level and the high water mark and no resisting root fibre exists to retard erosion. By planting trees in the novel position a portion will always be above high water level and supply the entire length with sufficient air and sun to sustain life throughout the flood period, and the most extensive root development will be between the low and high water level where needed to resist erosion.

Engineers and others can study the drawings and cuts of various constructions and learn from them how the writer can immediately stop erosion with temporary artificial protection until the tree and root growth is advanced sufficiently to withstand an occasional flood or storm. Formation and attack varies largely, and each formation will require individual study to meet existing conditions with a silt-collecting construction to give immediate service. The writer is grateful for the privilege of being allowed to demonstrate the system on various formations, and is glad to report that results have been very gratifying on most of the formations allotted for an application of the system.

Gatineau River Construction

For cross comparison, I will cite the Gatineau River construction for the Dominion Government in the Ottawa district. For stone rip-rap on identically the same formations adjacent to the writer's work up-stream the Government paid $16 per lin. ft. of river bank while I received approximately $5.50 per lin. ft. The one construction has now stood the test for three years and the second two seasons, and I feel

FIG. 6—CUT CONTROL NEAR HORNEL, N.Y., ERIE RAILROAD

assured it is past all danger from flood attacks owing to advanced growth and root development.

In 1926, as an experiment, the city of Buffalo awarded the writer a contract amounting to approximately $27,000, based at $4 per lin. ft. of river bank. In 1927 I was again awarded a contract by the city of Buffalo for $25,600 at $4 per lin. ft. But I was obliged to secure same by competitive bidding to comply with city laws since my system is patented. Stone rip-rap was considered the next cheapest solution and bids were asked and advertised on stone rip-rap. The lowest bid on same was $19 per lin. ft. of bank.

Mississippi and Missouri Rivers

The writer was privileged to demonstrate his system on both the Mississippi and Missouri Rivers last fall for the U.S. Engineering Department, which will have to produce the same desired results as their standard rivetment and stone rip-rap river bank protection. Both contracts have been executed and must be maintained for three years, and in each case the cost is less than half the cost of U.S. systems.

The various cuts are typical views from some of the constructions. Fig. 1 shows in the foreground the original formations on the Missouri River east of Kansas City, where the system was applied in the fall of 1927. Fig. 1 also shows bank sloped 3 to 1 and angular willow planting applied with construction nearly complete. The distance from crest of bank to low water level on slope is approximately 40 ft. where willow poles are planted and protected as detailed on accompanying diagram.

In addition to a single silt collecting mat of brush, stone and cross-woven wire fencing as shown on diagram at toe of willow poles, I applied four sections which extend approximately 30 ft. into the river beyond the original toe of bank and water level which should give equal service to U.S. standard river rivetment work, to a 30-ft. depth, which was considered extensive enough at portion of river in question. Where deeper scour is expected additional sections should be added.

Figs. 2, 3, 4 and 5 are Mississippi views near Dubuque, Iowa. Fig. 2 shows original formation; Fig. 3, bank sloped approximately 2 to 1 and willow poles in position; Fig. 4, local willow brush over top of willow poles, extending 20 ft. into the river to protect under scour; Fig. 5, work complete in accordance with the diagram.

Figs. 6 and 7 show the Erie R.R. near Hornel, N.Y., on a creek cut control. The creek in question is approximately two miles in length from source to mouth and rises 900 ft. At intervals of heavy rains up the valley the flood waters carry silt of various kinds, which they deposit on the railroad, causing frequent delay in transportation. Steam shovel

FIG. 7—RESULTS OBTAINED IN THREE YEARS ERIE RAILROAD PROJECT

operations have been resorted to several times and basins have been excavated for the next occurrence. Each operation became more expensive owing to lack of space to deposit material. Concrete dams had been considered at intervals up the creek, but the cost was almost prohibitive. In the spring of 1923 the writer planted approximately 65,000 running ft. of white willow poles on the slopes of the creek channels and to protect the extensive planting from being carried down stream in case of an early flood before the trees became fortified by a few years' growth, he resorted to local young trees and built timber catch-basins at intervals. The result was that the basins have been sufficient to date, although most of them are brimful of silt.

Fig. 6 shows a timber basin and three years' growth of willow forcing its way up through the accumulated silt. As the timber walls weaken the willow growth gets stronger and a permanent solution is assured. Instead of the creek bed cutting deeper, it is filling up.

Fig. 7 shows the growth attained on upper regions of creek and the practical impossibility of the creek getting out of its present channel. Both banks are lined with trees and the creek channel is gradually becoming lined with roots, limiting the possibilities of deeper cutting.

Highway Bank Protection

Figs. 8 and 9 illustrate results attained for the Ontario Department of Highways near St. Thomas, Ont. The spring flood of 1925 eroded the river bank to the extent of 11 ft. and almost destroyed the roadbed approaching the bridge. An elaborate concrete wing dam was contemplated and finally the angular willow planting system was applied at the small cost of $2 per lin. ft. of river bank. Fig. 8 shows formations at time of construction and Fig. 9 shows results attained in two years. Maintenance expires in spring of 1928 and all engineers familiar with demonstration claim a permanent solution.

Fig. 10 shows results attained on Lake Erie near Port Stanley. A few years previous to 1924 the Dominion Govern-

FIG. 8—ONTARIO HIGHWAY PROJECT ON RIVER NEAR ST. THOMAS, ONT.
Original Formation Before Construction Was Undertaken

ment built 200 ft. of sheet-piling groins at 800-ft. intervals to protect summer homes, but with no results. The cut shows how the earth bank had receded beyond the Government groin, necessitating the removal of many cottages. In the fall of 1924 the writer demonstrated his angular willow planting and Fig. 10 shows results attained in three years. For temporary protection a lumber retaining wall or sand trap was built near the water line on the beach with results to date showing extensive beach reclaimed. The sand trap has

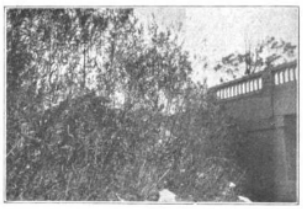

FIG. 9—SHOWING GROWTH IN FIVE YEARS AT PROJECT NEAR ST. THOMAS, ONT.

elevated the beach approximately 5 ft. and the water has receded double the width of original beach.

Erie Canal Project

Figs. 11 and 12 illustrate results on the Erie Canal in the State of New York, near Clyde. Fig. 11 shows original formation in the fall of 1926. This bank was planted to willow as shown in diagram on an approximate 2 to 1 slope, while Fig. 12 shows results attained in 12 months at an approximate cost of $3 per lin. ft. of bank with a three-year maintenance guarantee.

Fig. 13 shows results attained in three years from horizontal tree planting on a prairie farm for a windbreak or shelter belt. Only one continuous row of willow poles was placed in an ordinary plowed furrow and then slightly covered with earth. Results far exceed individual vertical tree

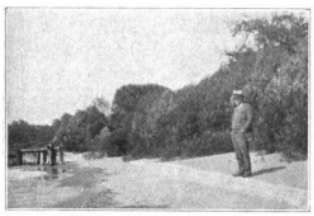

FIG. 10—LAKE ERIE PROJECT AT PORT STANLEY
Results Obtained in Three Years. Note the Lumber Sand Trap

planting. First, there is no tree or stake sticking up in the air to be whipped about by strong winds and to be kept alive by disconnected roots. Secondly, seedlings or cuttings supplied by nurseries of Government forestry farms are small and of weak vitality. If weather conditions are not favorable immediately after planting they are burnt or dried up by sun or strong winds and results are often discouraging on the treeless farm.

If poles of any length varying in thickness from 2 to 4 in. are planted in shallow trenches similar to the planting of potatoes, readers can be assured that results will far exceed individual vertical planting, providing the poles or limbs are cut and planted in proper seasons. Equally satisfactory results can be obtained from any of the cottonwood and poplar family of trees as from the willow.

To demonstrate the theory that poles planted horizontally give better results than cuttings. Many readers of this

FIG. 11—ORIGINAL FORMATION NEAR CLYDE, N.Y., NEW YORK STATE ERIE CANAL PROJECT

article have noticed piles of cordwood and poles of varying diameter. The smaller limbs soon burn where often some of the bigger limbs start to sprout and keep growing well into summer even when not in contact with any earth whatever. The stronger vitality and extra moisture in the thicker wood causes this. If 2 or 3 ft. of sprouts can be produced from the vitality of a log not in contact with any moisture except rain and dew, what might be expected if this same log was resting an inch below good cultivated land? Roots as well as limbs would develop along the entire length of poles and from 3 to 6 ft. in length the first season.

The forestry branch of the Ontario Government, at the writer's request, made demonstrations for comparison between individual vertical and horizontal planting on pure blow sand to prevent sand dunes from covering good farm land and property. An official report the first year stated that individual planting was largely a failure, while horizontal pole planting is a marked success. Prospects are bright for reforesting drifting sand dunes. An average growth of 3 ft. was attained and roots were traced to a distance of 15 ft. from the buried logs, seeking after moisture.

Mississippi Flood Control

The biggest problem in the United States to-day for engineers and others to solve is how to reinforce and elevate the levees that a disaster similar to that of last spring cannot occur again. Fig. 14 is a view personally secured near Memphis, Tenn, in the early part of June last. The big flood was then playing havoc in the lower valley but was fast receding in this district. An extensive tour was made to study flood conditions. Many sections of the huge levees were extensively eroded and partly washed away by the flood waters. Without doubt some of the levees inspected would

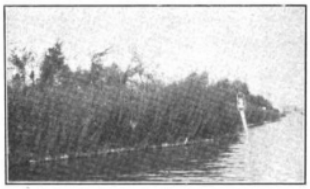

FIG. 12—NEW YORK STATE PROJECT, RESULTS OBTAINED IN 12 MONTHS

have been completely washed away had not the railroads operating over the levee shown in the illustration and the State of Arkansas provided an army of men and trainloads of sandbags to stop the destruction of hugh waves and prevent the river from eating its way through these levees, which are built of pure river silt. After the thin layer of sod and root fibre is lapped away mostly by wave action, this loose soil has very slight resisting power and many breaks occur before the river runs over the crest, cut away before erosion could be stopped with sandbags as shown on cut, as it is impossible to have material and labor along the hundreds of miles of levees at the critical moment.

With the assurance that levees do break before the water goes over the top, the building of higher and thicker levees will not make them positively proof against destruction. They should be reinforced, at least on the river side, by some method that has a stronger resistance to wave action than Bermuda grass. Concrete and stone rip-rap are two methods, but the cost would be too great. Many engineers are favorably inclined towards tree growth and others are opposed for various reasons. First, experience has shown that where a clump of trees were allowed to spring up on the river face of levees eddies were caused and erosion started down stream from trees. Second, levees must be constantly patrolled for the detection of burrowing animals, to prevent them from cutting a tunnel. The crawfish or crab seems to be the most destructive in lower regions where the river flows on a higher level than the surrounding country. In these regions the writer would strongly advise the angular planting of willows on the land side of levees. The crawfish do not operate on a dry levee 11 months in the year and only cut tunnels where they have water following them.

Willow Extensive Root System

Certain species of trees are barred by many of our cities for boulevard and lawn planting owing to the fact that they

penetrate sewer and storm drains with their roots and completely block drain pipes of large diameter. If trees of this nature were planted extensively and systematically along the levees where the crawfish is harmful owing to its minute tunnels, it seems logical that willow or poplar roots would plug these tunnels more efficiently that mere plugging on the surface, since roots have been known to follow a tile drain over 100 ft. and completely block it in one season.

FIG. 13—PRAIRIE WIND BREAK. RESULTS OBTAINED IN 3 YEARS

It was interesting to inspect various sections of the levees after the big flood. Wherever a heavy stand of native willows or other forest trees were growing in the burrow pits and on the land between the river the erosion from wave action and current was very slight and on miles of levee where tree growth existed no injury was caused whatever. On the contrary, where land was cleared and there were no obstructions to break the waves, injury and destruction were evident along the entire distance.

With these conditions as evidence, it is clear that tree growth should be encouraged along each levee to stop the action of waves and currents. If the levees were reforested with angular tree planting and the entire face supported from toe to crest with domestic willow poles spaced at approximately 4 ft. intervals, there is no doubt that the score of trees springing from each buried log would soon make the whole face of the levee immune to erosion and burrowing animals. Each log would be a support from base to crest. The danger pointed out by some engineers regarding the formation of eddies cannot be realized when a continuous and

FIG. 14—VIEW ON THE MISSISSIPPI RIVER NEAR MEMPHIS, TENN.

even tree growth springs up over the entire slope. Erosion would cease and reclamation of silt would collect and make the levees thicker.

For private agricultural gains the writer has had experiences for 25 years on earth levee building for river control and 100 per cent. of the success attained is due to willow planting in conjunction with levees to make them immune to erosion and burrowing animals.

With four years of experience in the planting of willow by the novel angular system on a score of varying formations, many engineers estimate that the system is a big asset to the country. To date, no construction has been executed without the writer's personal supervision.

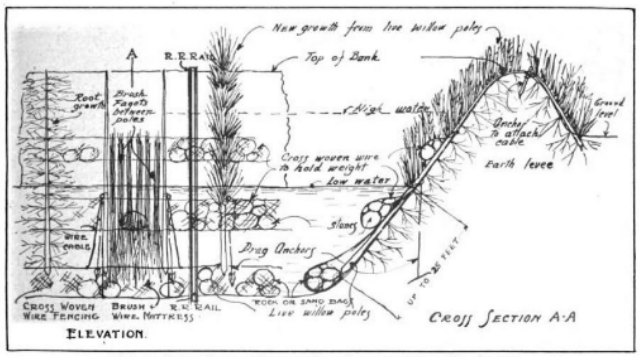

FIG. 15—SKETCH SHOWING SYSTEM OF RIVER CONTROL BY WILLOW POLE PLANTING

On Fri, Feb 23, 2024 at 3:22 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

Central Valley Flood Protection Plan Conservation Strategy (November 2016), Appendix D. Vegetation Management Strategy

Annalisa Louise Batanides Tuel. 2018. "Levee Vegetation Management in California: An Overview of Law, Policy, and Science, and Recommendations for Addressing Vegetation Management Challenges," Environs

On Fri, Feb 23, 2024 at 3:17 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

J.P. Dwyer and D.R. Larsen, 1997. "Value of Woody River Corridors in Levee Protection Along the Missouri River in 1993."

Elizabeth A. Cook, 2003. "Missouri River Flood of 1993: Role of Woody Corridor Width in Levee Protection." Journal of the American Water Resources Association.

Rood, S. B., Bigelow, S. G., Polzin, M. L., Gill, K. M., and Coburn, C. A. (2015). Biological bank protection: trees are more effective than grasses at resisting erosion from major river floods. Ecohydrol., 8: 772–779. Doi: 10.1002/eco.1544.

Council on Environmental Quality, "Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations," (March 23, 1981, Amended 1986).

People ex rel. Department of Public Works v. Bosio, 47 Cal. App. 3d 495

California Oaks Foundation, "Care of California's Native Oaks" in Bulletin of the California Oak Foundation (Oakland, 2016)

Executive Office of the President, Council on Environmental Quality, Memorandum for heads of Federal Departments and Agencies, January 14, 2011

Final Environmental Impact Statement for the Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System

Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild and Scenic Rivers System

On Fri, Feb 23, 2024 at 3:00 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

MBK Engineers, "2017 Lower American River Streambank Erosion Monitoring Report," (May 2018)

On Fri, Feb 23, 2024 at 2:58 PM Josh Thomas <joshjhthomas@gmail.com> wrote:

Dear United States Army Corps of Engineers and CA Department of Water Resources public comment recipients,

I am submitting the following documents to make them part of the project record.

FEMA, *Engineering with Nature: Alternative Techniques to Riprap Bank Stabilization*

CALIFORNIA CODE OF REGULATIONS TITLE 14. NATURAL RESOURCES DIVISION 6. RESOURCES AGENCY CHAPTER 3: GUIDELINES FOR IMPLEMENTATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT AS AMENDED DECEMBER 28, 2018, 15126.6(a).

We Advocate Through Environmental Review v. County of Siskiyou (April 20, 2022) 78. Cal.App.5th

Federal Register, Vol. 46, No. 15, January 23, 1981.

Wild and Scenic Rivers Act

Friends of Mammoth v. Board of Supervisors, 8 Cal. 3d 247

HDR David Ford Consulting Engineers, "Lower American River Erosion Conditional Risk Assessment: Subreach 1, 3, and 4," (2019)

MBK Engineers, "2017 Lower American River Streambank Erosion Monitoring Report," (May 2018)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:27 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: Heidi Mclean <mcleanheidi@aol.com>
Sent: Friday, February 23, 2024 4:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Heidi McLean <mcleanheidi@aol.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:

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 lived in Sacramento for over 30 years and I love the American River because of its natural beauty, bountiful wildlife, and the fact that it looks like a river should. The proposed work makes it look

like a ditch, not a river. You are eliminating the elements that are essential to it being a "Wild and Scenic River" with the massive demolition of the riverbanks and the vegetation that is already present which protects us from flooding. All over the world there are efforts to undo projects and go back to nature's way of protecting the areas around waterways. Wetlands are being recreated and restored.

B

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 clearcutting all the trees, and having bare banks during two years of construction will protect us. The construction is followed by years of isolated, immature plantings, that do not replace the mature wetlands we currently have and are 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 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. These impacts include:

C The need for large earthmoving equipment, a hundred truck trips per day which will damage existing roads and existing levees

D Massive amounts of rocks from unspecified sources, which puts residents in danger of more exposure to asbestos containing serpentine rock which is commonly found in the surrounding foothills. There is no accounting for the associated dust of placing these rocks within a quarter mile of a school. This SEIS/SEIR is not complete without this analysis.

E 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.

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.

Heidi McLean

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, 4Aand 4B draft EIR/EIS and Mitigation Measures VEG-1, VEG-2, BIRD-1, VIS-2, and WATER-1 for impacts on vegetation and wildlife.

1 In this letter, our comments focus on native plants and wildlife recommendations, based on our long-term research at Bushy Lake. The ecological and cultural significance of the Urrutia Property, Woodlake, Bushy Lake, and Arden Pond are clear from the environmental assessments in combined Corps documents and the public and agency responses to this documentation. The four lacustrine features on the lower American River provide vital habitat corridors, biodiversity, and cultural and ecological value for the lower American River. The information provided is based on a thorough literature review and data collected over several years at the Bushy Lake Restoration Site (BushyLake.com). We use our data from Bushy Lake as an analogue/ reference template for the ARMS and American River Erosion Control projects.

The American River Parkway riparian corridors, lacustrine habitat, native vegetation and wildlife are extremely valuable to me. I have spearheaded the Bushy Lake Project near Cal Expo since 2015. We are funded by the California Wildlife Conservation Board, among other sources, and have collected three years of detailed data on the culturally important native plants, birds, mammals and northwestern pond turtles. We have written a separate letter regarding the northwestern pond turtle. Our data can be viewed on the Bushy Lake web site (BushyLake.com) in our 2023 Conceptual Restoration Plan Baseline Information plus Appendices.

The detailed research at Bushy Lake provides both an environmental baseline and analogue for management and conservation on the lower American River. We are in the process of completing the 35% Conceptual Restoration Plan for Bushy Lake, and our background and data may prove helpful for the Urritia/ Arms site.

1. Birds – Avian Diversity

Bushy Lake provides an analogue to the Urritia Property with important and diverse bird habitat. Daniel Williams, a professional biologist and Audubon representative, conducted avian point count surveys at Bushy Lake every other weekend in 2020 beginning February 1st. He recorded 120 species of birds at Bushy Lake. CSU Sacramento researchers have continued these surveys, recording over 140 species of birds. The avian diversity of Bushy Lake is truly astounding; many avian species move between the Urritia property Wood Lake and Bushy Lake. We concur with all aspects of the letter from Dan Airola and Central Valley Bird Club on the subject project SEIS/SEIR. 2

2. Wildlife – Mammals and Beavers as Ecosystem Engineers

We use wildlife cameras to monitor turtles, beavers, and other wildlife species at Bushy Lake. At Bushy Lake, beaveways or canals appear to be an important element contributing to habitat complexity, interspersion and diversity. The turtles and other wildlife species utilize the beaveways for as corridors through the site, as a conduit from lacustrine to terrestrial habitat, and from Bushy Lake back and forth to the American River. Terrestrial habitat is critical for turtle nesting and successful reproduction.

During the June 2021 wildfire, the wetland area south of Bushy Lake expanded due to beaver activity and increased hydration. This area proved to be a wildlife refuge where wildlife could seek shelter and habitat remained after the fire. 3

3. Wildlife

A plethora of wildlife species have been captured utilizing the beaveways and the areas surrounding Bushy Lake. These species use the lower American River as a habitat corridor, and their presence at Bushy Lake indicates their presence at the Urritia property and along the rest of the lower American River corridor. Common species documented within the project site included the non-native California quail (*Callipepla californica*), western bluebirds (*Sialia Mexicana*), mallards (*Anas platyrhynchos*), wood ducks (*Aix sponsa*), a bobcat (*Lynx rufus),* coyote (*Canis latrans*), California mule deer (*Odocoileus hemionus*), eastern gray squirrels (*Sciurus carolinensis*), desert cottontails (*Sylvilagus audubonii*), striped skunks (*Mephitis mephitis*), opossum (*Didelphis marsupialis*), raccoons (*Procyon lotor*), feral cats, North American beavers (*Castor canadensis*), and North American river otters (*Lontra canadensis*), and non-native turtles. Deer beds occur frequently in the Bushy Lake area; does with spotted fawns have been frequently observed bedding down in the *in-situ* restoration area.

Many migratory species must establish migration routes commonly used by resident and migratory species for passage from one geographic location to another. Corridors are present in a variety of habitats and can link otherwise fragmented acres of undisturbed areas. Maintaining the continuity of established wildlife corridors is important to: a) sustain species with specific foraging requirements; b) preserve a species' distribution potential; and c) retain diversity among many

wildlife populations. Therefore, resource agencies consider wildlife corridors to be a sensitive resource.

Wildlife diversity extending along the lower American River corridor through Urrutia property, Wood Lake, and Arden Pond, act as a vital wildlife corridor and habitat refuge. These remnant patches of open water lacustrine, wetland and riparian habitats within the leveed and fragmented lower American River corridor are essential meristematic pulse points in the watershed. Lacustrine open water habitat is very limited along the lower American River watershed. Due to the limited corridor habitat available, wildlife species are not able to simply move away from construction projects in urbanized areas like the American River Parkway. The Final NRMP (January 2023) identifies the value of open water habitat on the Parkway (Section 4.9.1, Open Water):

"Habitats associated with lakes are also considered open water habitat and are characterized by depressions filled with standing water. This habitat type can vary in size, from small ponds to large areas such as flooded lakes or reservoirs. The primary lacustrine features are Urrutia, Wood Lake, Bushy Lake, Arden Pond, Sailor Bar pond, and the series of mining ponds at Sacramento Bar. As noted above these ponds provide important resting and foraging habitat for many aquatic bird species, including diving ducks, and the deeper ponds may be preferred by many. Lacustrine habitat typically supports species of plankton, as well as other microorganisms in the still, open water. Lacustrine habitats are important for reproduction, food, water, and cover requirements for the northwestern pond turtle, as well as many mammals, birds, other reptiles, and amphibians. Lacustrine habitats exist throughout California, and often occur alongside riverine and freshwater water emergent wetland habitats."

4. Culturally Significant and Fire Resilient Native Plants

The following plants are recommended for revegetation within the ARMS/Urrutia Project area. These plants are all shown to promote wildlife habitat, help with erosion control, promote fire resiliency, promote pollinator habitat, and are culturally significant in this area.

4

I am happy to share our experimental data and results incorporated into the Bushy Lake Conceptual Restoration Plan from our Pilot Project supplemented by experimental results. Our comments utilize this research to design a fire resilient native plant palette, with emphasis on culturally significant plants, pollinators. Some of these plants are excellent at erosion control and streambank stabilization due to extensive rhizome and root development. In particular, valley sedge (*Carex barbarae),* beardless wild rye (*Elymus triticoides)* and California mugwort (*Artemisia douglasiana)* have extensive rhizome systems, are extremely beneficial for erosion control, and are resilient to fire. Based on my doctoral research, *Carex barbarae* can produce as many as 100 rhizomes in a year, is environmentally plastic and able to withstand both flooding and drought, is resilient to fire, and is a cultural keystone species for California Indian basketweavers (Stevens 1999, 2020, 2024). Culturally significant plant species, adapted to centuries of traditional fire management, will be incorporated into the Bushy Lake planting design to promote fire resiliency. Plant species selection will further provide an opportunity to showcase Native American cultural knowledge and ethnobotany to the public.

Cultural Plants - The proposed restoration recommendations are based on culturally significant plants for gathering, tending, and stewardship. Cultural plants are developed using four key sources of information: 1) personal knowledge of ethnoecology and culturally important plants; 2) conversations with both California Indian traditional knowledge holders and restoration ecologists; 3) historic maps and records of riparian habitat types in the Cal Expo floodway; and 4) experimental data from the Bushy Lake in situ restoration. Revegetation recommendations are based on native and culturally significant plants with added benefits for pollinators and wildlife.

We are recommending the following cultural plants be planted or maintained in the Corps project areas. Narrowleaf Willow (*Salix exigua),* Buttonwillow (*Cephalanthus occidentalis*); Walnut (*Juglans hindsii*); Elderberry (*Sambucus Mexicana*); White Root (*Carex barbarae)*; Dogbane (*Apocynum cannabinum* ; Tule Hardstem Bulrush (*Schoenoplectus acutus*) and Cattail (*Typha* species); Pinole-Pollinator Prairie and Milkweed and open water.

a) Narrowleaf Willow (*Salix exigua)*

Narrowleaf willow (Salix exigua) is the willow species treasured by basket weavers (Stevens, Fencel, Hoag and Anderson 2024). This willow is prolific, is very fire resilient, and environmentally plastic. Willow poles are burned, coppiced or pruned to create long straight shoots for basketry. The value of willow as the raw material necessary for the manufacture of a family's household goods cannot be over-estimated (Stevens and Anderson, NRCS, 2024). Willow branches are used as the warp for twined baskets and the foundation in coiled baskets. Willows are used to weave cradleboards for infants, hats, cooking vessels, serving bowls, trays, seed beaters, and storage baskets. Some tribes use willow roots as a sewing strand. Virtually all California tribes use willow in their baskets (*Ibid.*). Willow flycatchers and other avian species utilize willow thickets. Willows establish well from cuttings, are fire resilient, and are quite prolific Pole cuttings can easily be obtained on-site to expand the willow thickets.

b) Buttonwillow (*Cephalanthus occidentalis*)

Buttonwillow is prolific in the wetted areas around Bushy Lake. Buttonwillow is known to have exceptional wildlife benefits, attracting many types of pollinators, waterfowl, birds, and mammals. Many species of waterfowl and shorebirds eat common buttonwillow seeds; deer browse on the foliage; and bees and other pollinators preferentially utilize the nectar and pollen of buttonwillow. Buttonwillow is thriving at Bushy Lake. No action is needed to maintain plant cultural alliance.

c) Walnut (*Juglans hindsii*)

Walnut thickets are prolific at Bushy Lake and thrived and expanded after fire. Tribal uses for walnuts produced by *Juglans hindsii* are used for food, the husks as a black dye element for baskets, and the shells are used as “dice” for gambling game pieces. The bark of black walnut was used by many native groups to make brown and black dyes, often used as design elements in baskets. The nuts of the black walnut are eaten by tribal people and many wildlife species. Walnuts produce a toxin, known as “juglone”, which inhibits the growth of other plants around it, thereby reducing competition. No action is needed to expand or maintain Walnut Cultural Alliance.

d) Elderberry (*Sambucus Mexicana*) Savanna

Elderberries are abundant, prolific and reproducing at Bushy Lake. These plants provide food, medicine, musical instruments, flowers and fruits for Indigenous and local people, pollinators and wildlife. Elderberries also provide critical habitat for the Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*), a Threatened species under the Federal Endangered Species Act. Elderberries are thriving at Bushy Lake, and young elderberries and prolific throughout the site. Elderberries are fire resilient and thrive with Indigenous Traditional Fire Management. There could be dissonance between Federal Endangered Species Act regulations for VELB, and Traditional Ecological Knowledge, fire management, gathering, and ceremonial uses by Nissenan, Miwok, Maidu, and other California Indians.

All parts of the elderberry plant are considered to be a valuable healing plant in many folk medicine traditions (Hutchens 1991, Walker et al. 1993; Barrett et al. 1933; Clarke 1977). The fruit is dried and then cooked, and made into medicinal syrup, jams, jellies, fruit juice, and wine. "Medicinally, elderflowers are a febrifuge and have a diaphoretic quality which lowers fever. They are steeped in water and made into a tea. Flowers can also be used to make tinctures; the alcohol or glycerin or vinegar act as a preservative and also help draw the medicine from the plant" (Sage LaPena, 2024, *Nomtipom and Tunai Wintu ethnobotanist and certified Medical Herbalist,* "Indigenous Perspectives on Elderberry", https://ucanr.edu/sites/Elderberry/Indigenous/Indigenous_perspectives/).

The dark blue fruit is not eaten fresh off the plant. The fruits are dried and then cooked to avoid consuming the cyanide-inducing glycoside in the seeds. Once dried, the berries can be cooked or stewed and then made into syrups.

Elderberry stems are made into a clapperstick, a percussive musical instrument commonly used by California Indians in the Roundhouse and other ceremonies. Smaller wood is used for whistles used daily by many practitioners or traditional people for song and prayer. Flutes are also created from the stems, most commonly played in Maidu tradition. Traditional Management Practices for elderberry includes traditional fire, coppicing and pollarding.

Elderberry produces a good seed crop almost every year. The seeds are dispersed by birds and other animals that eat the fruit. The seeds have a hard seed coat and embryo dormancy; they may remain viable for up to 16 years in storage. Without pretreatment, seed germination may be delayed from 2 to 5 years after planting. Plants may flower and fruit after only 2-3 years and can reach full size in 3-4 years. They are said to be "short-lived." Cuttings of elderberry tend to have lower survival success than establishment from seed (Stevens, Nesom and Anderson 2024).

e) White Root (*Carex barbarae)*

White root is a cultural keystone species to California Indians. White root is a significant basketry material used by central California Native Americans, who use the long white rhizomes for the sewing strand in coiled baskets. White root was used by over one third of California tribes for basket weaving (Stevens 1999, Stevens 2020, Stevens and Anderson 2024). We have established a vital stand of white root in the in situ restoration project at Bushy Lake, and it occurs in prolific patches in the riparian forest/ woodland understory. Plants can be divided into plugs and planted to increase white root around the perimeter of Bushy Lake.

White root is an important riparian understory plant for riparian forests and woodlands. The rhizomes on this plant are important for basket weaving, erosion control, and flood protection. *Carex barbarae* is increasingly being recommended for riparian restoration, streambank stabilization, and erosion control. Because of their wide availability in riparian corridors, the lens-shaped seeds of sedges are eaten by many kinds of wildlife, particularly waterfowl. (M. Stevens 1999, 2020, 2024)

f) Dogbane (*Apocynum cannabinum*)

There is a patch of dogbane in the south side of Bushy Lake. As the beavers built canals, they expanded the southern wetlands. Dogbane is a valued and important cultural plant, and very scarce in California and is highly reduced from pre-settlement abundance. Also known as Indian hemp, this plant is widely used by Native Americans as a source of strong fiber for ropes, nets, baskets, headbands, sally bags, ceremonial regalia, and other uses. In California, Indian hemp and milkweed are used somewhat interchangeably for cordage. The stems are cut in the fall; they are then split open and the long, silky fibers are removed. The fibers are then twisted into string which provides cordage. String, thread, rope, baskets, snares, netting, and clothing were made from the bast fibers of the Indian hemp plant because they are so silky yet strong. Cordage was then used to make tump straps, belts, netted bags, hairnets, and ceremonial regalia (capes, skirts, and head-dresses).

The seeds are collected after pods have ripened, but before they have split open. This usually occurs in late summer, from August to September. Seeds can be directly sown into the ground in the fall. Plants can also be divided and planted. Both milkweed and dogbane are burned in the fall to eliminate dead stalks, to stimulate new growth, and to remove competitive plant species. Burning causes new growth to have taller, straighter stems (with longer fibers). It also stimulates flower and seed production. (Stevens, 2024, NRCS Plant Guide)

g) Tule – Hardstem Bulrush (*Schoenoplectus acutus*) and Cattail (*Typha* species)

Tule is culturally very important to local tribes. Traditional fire management is needed to control senescent vegetation, encroachment on other habitat types, and evapotranspiration induced water loss. While tule can be an increaser without Traditional Resource Management, it is also a cultural keystone species. The US Army Corps of Engineer Technical Center of Expertise (TNTCX) has facilitated an alliance with tribal partners dedicated to combining Traditional Indigenous Ecological Knowledge and Traditional Western Ecological Knowledge to achieve successful tule recovery. Tule reeds play a vital part in the lives of native people (Tule Restoration Alliance, 2024, https://www.spa.usace.army.mil/Missions/TNTCX/Traditional-Ecological-Knowledge/Tule-Restoration-Alliance/).

The harvested material has traditionally been utilized for sacred and cultural practices critical to the continuity of Indigenous lifeways (Ekness Norton 2009). Tule reeds are collected and used to build boats, houses, sleeping mats, duck decoys, and baskets. The roots and seeds are also edible contributing to a healthy Indigenous traditional diet.

Tribes believe fire is medicine. Cultural burns are not prescriptions to reduce fuel load, rather they are restorative and used to cultivate new, healthier, stronger growth of important species like tule. The cultural burns are also ceremonial and play an important role in preserving and passing on cultural heritage to future generations.

Tule provides many benefits to the ecosystem such as fish and wildlife habitat, erosion prevention, flood control, and improved water quality.

h. Establish a Pinole-Pollinator Prairie (with the establishment of milkweed)

At this time, areas to be planted as Pinole-Pollinator Prairie are best suited to replace both drier and wetter ruderal weedy herbaceous vegetation. Pinole is a porridge or seed cake that provides reliable food throughout the year. Pinole provided a staple food source composed of seeds and grains harvested from California forbs and grasses. California grasslands and wetlands were productive "breadbasket" regions for California Indians. There is no historic record of starvation due to wildland bounty. Millions of pounds of seeds were gathered from the grasslands and wetlands of the Great Central Valley in California (Anderson et al., 2012). Indians relished the taste of many kinds of small seeds and grains gathered from the inflorescences of wildflowers and grasses. Tarweed and other native plant seeds in pinole formed a staple food in the diet of the Indians of the Great Central Valley. In particular, pinole consisted of the seeds of common madia (*Madia elegans*) and other tarweeds (*Hemizonia* and *Madia* species), wild sunflowers (*Helianthus annuus*), red maids (*Calindrinia menziesii*), chia (*Salvia Columbariae*) and many species of native and non-native grasses. Seeds were traditionally harvested by women in late summer when they were ripe. Traditionally, a seed beater and a basket were used to gather the seeds. Then, the seeds were winnowed and ground very fine in a bedrock mortar with a stone pestle. Traditional Fire Management is an important management tool for prairie plants and seeds. After prairies are burned, seeds gathered from the scorched plants needed no further parching before being crushed into flour.

The dark seeds (achenes) of tarweeds are used as food by many birds and small mammals, including mourning doves, quail, blackbirds, finches, Oregon juncos, California horned larks, western meadowlarks, American pipits, sparrows, towhees, chipmunks, ground squirrels, and mice.

With the establishment of the above Pinole-Pollinator Prairie, it is also recommended to establish milkweed populations to the Project area. Milkweed promotes pollinator habitat, which is especially important for migratory monarch butterfly (*Danaus plexippus*) habitat. Two species that have seen success in this type of habitat are Narrowleaf milkweed (*Asclepias fascicularis*), and Showy milkweed (*Asclepias speciosa*).

Revegetation Plant Palette

We propose utilizing a native plant species palette based on plant species tested experimentally in the Bushy Lake in-situ restoration area. We are happy to provide this information to you. We proposed plants based on their successful establishment as seeds and seedlings proven experimentally to be adapted to site conditions. They were also chosen if they are beneficial to pollinators and provide wildlife habitat. We have created a preliminary plant palette focusing on native species observed during a 1986 plant survey (Wymar 1986) and personal ethnobotanical knowledge/ tribal input. This gives us a reference baseline for the re-establishment of native species known to occur on this site that are also on the lower American River plant list developed by Sacramento County Parks.

5. Endorsement

5 We endorse the concerns expressed by other entities including the letters submitted by 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 ECOS 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, 4Aand 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).

Speaking as a citizen and resident of this area, and a dedicated restoration ecologist and ethnobotanist, the Urrutia, Woodlake and Bushy Lake areas are deeply loved and valued by myself and my Bushy Lake Awanata Team, including faculty, stakeholders on the lower American River, and hundreds of students from Sacramento State.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:26 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

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From: Christie Vallance <christiev44@gmail.com>
Sent: Friday, February 23, 2024 4:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

Dear Army Corps of Engineers,

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.

1 Concern: I just discovered through my own observations that significant erosion has occurred on contract 1 and 2 of the American River project. I have pictures that back this up. You also mention this in several of your updates to the community. Can you explain how your project design for Contract 3b is informed by this information? Please tell me any further field studies you have completed on the success rate of this prior approach in light of this information? I personally would like to know that your Contract 3b design does not make us more vulnerable to erosion as tree roots direct water to mid channel, rather than tearing into the banks

as I have witnessed in your latest update region. Please answer this in your reaction to public comments. I will be looking for this information.

Thank you,

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:25 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Subject: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report December 2023 Report and Appendices

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From: Thomas Vallance <vallance219@gmail.com>
Sent: Friday, February 23, 2024 4:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Subject: Comments Regarding American River Common Features 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report 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.

1 I just noted that SAFCA's published Urban Level of Flood Protection 2022 Annual Report mentions that once the Folsom Dam raise is completed, the "200-year flood discharge into the American River will not exceed 115,000cfs. Project 3b is built around a 160,000cfs model." Please explain how you are incorporating this information into the project design and approach for 3b?

Respectfully

Christie Vallance

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:25 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] 3B American River Proposal

-----Original Message-----
From: Theresa Weaver <tmw6258@gmail.com>
Sent: Friday, February 23, 2024 4:47 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Theresa Weaver <tmw6258@gmail.com>
Subject: [Non-DoD Source] 3B American River Proposal

To USACE,

I deeply implore your attention and revisioning of your plan for the American River project 3B. For an area vital to the ecological sustainability for vistas and wildlife, your proposal and plan is destructive, unnecessarily invasive, and lacks utilization of natural, alternative options already in place.

The area designated in Plan 3B includes destruction of the sensitive riparian areas that are “Protected Areas” in the
1 American River Parkway Plan. The USACE plan proposal is extreme for the “potential erosion” concern and while cited as preventative, the proposed actions are more destructive to the ecological balance than that of potential erosion. The loss of habitat for many important species, including migrating birds, will hugely impact the biodiversity of this complex, interconnected ecosystem.

The unnecessary, major loss of wildlife and critical habitats will be due mostly to the heavy equipment and machinery used to execute this plan. The American River Tree Project notes “modern, advanced modeling predicts that water velocities are low at the levees. The older models used did not account for the protective effect of trees slowing the velocities at the edges. The improvements to weirs and bypasses, and the new spillway at Folsom dam and new operating protocols allow for better managing of flows, including earlier, release of water when storms are forecast.”

As the “City of Trees,” I’m shocked Sacramento has allowed this deforestation to occur along our city’s jewel. Major levee flooding has been known to occur in areas of clear-cutting, such as proposed in 3B. Let’s allow the beautiful and historic greenery to not only remain as some have longer than our country has been established, but to amour the riverbank as a hundreds of years old, self-renewing natural barrier. Although new vegetation planting is proposed, natural regrowth will be limited due to the proposed modifications and planted vegetation will take longer than my lifetime to reach the maturity and stability of some of the currently residing trees.
The American River Parkway is home to over 5 million visitors a year- more than Yosemite. This urban sanctuary
2 provides a connection and access for Sacramento community members and all visitors including disadvantaged populations to

enjoy the true beauty and spiritual oasis the parkway provides. Green spaces are scientifically noted to contribute to improved mental health, and linked to reduced stress levels, enhanced mood, and increased feelings of well-being. In these times of social injustices, political unrest, threats to human rights, increased cost of living, and as pandemic COVID outbreaks continue, we as humans need to address and prioritize mental health more than ever.

With available technology, other completed projects, targeted spot erosion improvements, and partnership with local environmental groups, we must do our best to protect ALL communities - people, wildlife, and nature. Let's work together to address these critical issues and maintain the title of City of Trees for which I'm so proud to be a part of. The City of Riprap is not a place I want to call home.

Theresa Weaver
April Weaver
David Powell
Jana Noel
Casey Thimjon
Nicole Eichenberg
Satbir Singh
Roland Muniz
Sheryl Muniz
Jason Weaver
Marea Filmer
Susana Guzman
Sharan Singh
Steve Pogozelski

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:24 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Proposed erosion control project on lower American River

From: john@johnacameron.com <john@johnacameron.com>
Sent: Friday, February 23, 2024 4:40 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Proposed erosion control project on lower American River

1 Your one-size-fits-all plan calls for erosion control measures in areas of where there is no measurable erosion. Why?

John A. Cameron

Writer, Speaker, Soft-Skills Trainer, Freedom Fighter

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:23 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: Jack McKeon <jpmckeon@gmail.com>
Sent: Friday, February 23, 2024 4:40 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.

A

I am a public land owner and believe the compulsion and need for this project has not been clearly elucidated and justified by the USACE and other stakeholders in the project.

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

The American River Parkway is very important to my family and neighbors. I have two young sons who are being raised on the banks of the American River with a

respect for nature and appreciation of our public lands. This project will practically destroy their access to the river and Larchmont Park.

B The toxic exposure to O.W. Erlewine school by the proximity of the staging site is also unacceptable.

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.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:18 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

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From: Karen Kunstler <karenkunstler@gmail.com>
Sent: Friday, February 23, 2024 4:35 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; 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.

Please support both flood control and trees.

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

A My daughter and family moved to the Sacramento area 5 years ago. I loved visiting them, especially our many walks by the river, enjoying

various access points. Then my son and his young family moved here a year ago. When my husband and I retired last year we moved from LA and bought a house in Arden Park to be close to the American River Parkway. We also helped our third child move from LA and buy a house on La Riviera Drive, within walking distance of river access so that he can enjoy walking his dog daily on the path through the trees by the river. We all regularly meet and delight in these walks, so close to the city, especially the 200 year old oak trees, the wildlife and birds. We were devastated to learn that these ancient trees and vegetation are planned to be bulldozed.

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.

Bring in smaller equipment so as not to damage the whole area.

I demand spot-by-spot evaluation and preservation of our precious resources, which have taken hundreds of years to grow.

Put a preservation order on these ancient trees!

Thank you.

Karen Kunstler

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:17 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

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From: Nancy McGee <ncmcgee_2000@yahoo.com>
Sent: Friday, February 23, 2024 4:35 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 Sacramento.

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. Nature based alternatives have not been presented. USACE has an Engineering With Nature program which could be used to present alternatives more in line with the American River's Wild and Scenic Designation.

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. We see the results at the H drive bridge and this is not acceptable solution

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.

Nancy McGee

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 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

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From: Dan Sendek <dansendek54@gmail.com>
Sent: Friday, February 23, 2024 4:34 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PubliccommentARCF16@water.ca.gov; Rep. Ami Bera, M.D. <repamibera-CA06@emanager.house.gov>
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

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.
A I am a Registered Professional Forester who has lived in Sacramento for over 25 years and along the American River for over ten. I am VERY familiar with forested ecosystems, riparian biology and the NEPA/CEQA processes. With all due respect your proposed project is an abomination in its current form. Those of us who have viewed and lived with the effects of your first

foray into this project (Campus Commons), are terrified with the prospect of our River being turned into another “Los Angeles River North”.

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. After over 150 years of healing and natural restoration following the destruction resulting from gold mining, specifically dredging, the Corps is proposing to negate the equilibrium which the River current exhibits. The exposure of significant portions of what is now a fully vegetated riparian zone will result in erosional habitat losses, both short and long term. THE LOSSES CANNOT BE MITIGATED.

C

2. I am particularly opposed to any bank erosion work proposed on the north side of the River. This portion contains a fully sufficient levee with minimal to no tree growth within its boundaries. This levee exhibits no signs of damage or potential for breech. To proposed bank erosion work below this levee will destroy countless acres of established riparian vegetation on this Wild and Scenic River with no discernable benefit.

D

3. I find it wrongheaded and ironic that the Corp proposes to remove bankside vegetation of a River which supports a viable and endangered anadromous salmon population. The removal of bankside tree cover will eliminate stream side food contributions as well as act to increase stream temperatures by eliminating shading within the system. This is particularly offensive considering future projections of global warming and its impacts.

4. I have viewed what the Corp considers “mitigation” for removing streamside tree cover. The few groups of woody debris anchored along the bank does not mitigate the loss of shade cover and the inputs of coarse woody debris resulting from recent project work.

The US Army Corp of Engineers MUST 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.
Daniel R Sendek
Registered Professional Forester 2285

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:13 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: Harsch, Fritz H <fharsch@csus.edu>
Sent: Friday, February 23, 2024 4:25 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 grew up on the parkway 55 years ago, before the bike trail had been constructed, and have lived in the Paradise Beach area for over 22 years. Proximity to the American River near the Paradise Beach access is a primary reason that I purchased a residence in that neighborhood. The parkway between Paradise Beach and the H street bridge has provided me with years of solace and recreation. Throughout that area I have swum, hiked, flyfished, trained dogs, observed the fauna, practiced nature and bushcraft skills, and sought privacy and serenity among the trees on the many small

A

walking trails. I am appalled at the desecration it has suffered. The concealed walking trails are now destroyed or roped off to prohibit foot traffic and beautiful trees that were decades old were chopped down and hauled away. The area is now an eyesore, barren and covered by ugly jute ground cloth. It will take years before new growth replaces the old. Direct access to the water itself between Glenn Hall Park and the H St bridge is almost entirely cut off. That stretch of water used to hold some of the finest stealhead and shad fishing on the Lower American. It is now eradicated. The results of the work done in that area almost feel malicious, as if the local residents have been spit upon.

Consequently, I strongly question whether this "potential bank erosion" work is necessary along these sections 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,
George Harsch iv

Barry, Devin

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:13 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

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From: Anne Kimmerlein <akimmerlein@gmail.com>
Sent: Friday, February 23, 2024 4:27 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 I have grown up enjoying the Wild and Scenic American River Parkway between Watt Ave and the Mayhew drainage channel. I have kayaked, cycled, walked my dogs, and trained for marathons along that stretch of river. Although I spent my early adult life away from the area, I now make the neighborhood directly adjacent to that stretch of levy and river my home. The beauty, trees, and nature of the parkway are one of the main reasons that I chose to live in this neighborhood.

I live in the neighborhood directly adjacent to the area of riverbank that will be drastically changed by the proposed project. I recognize the need to adapt and adjust to a quickly changing climate and am very aware of the flood risks that living this close to a river poses. I deeply care about my neighborhood and the larger community of Sacramento and support work that helps protect us against flooding. However, I strongly question whether the proposed bank erosion work is necessary along this particular section of the American River. Additionally, I am concerned that the proposed approach of removing mature trees and vegetation, two years of construction, and the many following years that it will take the replacement plantings to mature will put the levy at increased, rather than decreased risk for erosion. Furthermore, scientific studies as far back as the 1990's clearly show that areas of greenspace remain significantly cooler than surrounding, cleared areas of land even as summer temperatures continue to rise. Removing the trees and mature vegetation along the American River not only will increase the local surface temperatures in an already warming climate, but also will remove the places that the local community goes to cool off under shade trees and in the shallows at the river's edge.
B

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 currently proposed.

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. Such alternative methods would result in far less environmental damage.

The decision to use a miles-long, continuous set of launchable rock toes 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 less significant impacts.

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 an elementary school and in a residential neighborhood 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). 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 and within a school zone. 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). 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. As the lead agency, USACE should have prepared a construction health risk assessment (HRA) for the Project. 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)).

USACE plans to remove 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. 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. 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 am concerned that 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 to levy erosion, not less. 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. In fact, I understand that a recent revetment area under a prior contract suffered damage during the far-from-peak-design flows during the 2023 storms, which had much lower water levels/velocities than what is meant to be addressed by the project in it's current form.

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 urge the US Army Corp of Engineers to reevaluate the design choices that result in what are deemed "significant unavoidable" environmental impacts, and develop targeted, 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 less destructive approach to Erosion Control Projects 3B and 4 is presented and considered. 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 greatly impact 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.

Sincerely,

Anne Kimmerlein, DVM, MPVM, DACVPM

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 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

-----Original Message-----
From: Jennifer Banville <jennifer.banville@icloud.com>
Sent: Friday, February 23, 2024 4:22 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 Im 74 years old and a Sacramento native. Our city has changed so much already with. Population growth, clogged freeways, surface streets and now you want to remove the NATURAL trees long our gorgeous river? NO NO NO! Let people live elsewhere.

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—-jennifer Banville

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 11:06 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA
Attachments: USACE_PS_FNL.pdf

From: Peter Spaulding <petenyvtca@comcast.net>
Sent: Friday, February 23, 2024 4:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Susan_Rosebrough@nps.gov; BellasE@saccounty.net; sorgenkc@saccounty.gov
Subject: [Non-DoD Source] Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814
Guy.K.Romine@usace.army.mil

Mr. Josh Brown
Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, California 95821
Josh.Brown@water.ca.gov

Submitted via email: ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Dear Mr. Romine and Mr. Brown:
Thank you for the opportunity to comment on the reports pertaining to this important project. The American River Parkway is the Crown Jewel of Sacramento and recognized across the country for its outstandingly remarkable recreational features. It is very likely the only river in the country with a federal and state Wild and

Scenic River designation flowing through, and located entirely within, a major metropolitan area. And you are about to destroy it.

For the reasons contained in this letter, the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA, for Contracts 3B and 4 MUST NOT BE APPROVED.

The American River Parkway Plan "acts as the management plan for the federal and state Wild and Scenic Rivers Acts." The "Plan is the policy document for the Parkway. It contains policy statements of a general and flexible nature. The Parkway Plan addresses the entire length of the Parkway which includes areas in the unincorporated County, the City of Sacramento, the City of Rancho Cordova and the Lake Natoma portion of the Folsom Lake State Recreational Area. The County of Sacramento adopts the Parkway Plan as an element of its General Plan. The City of Sacramento and City of Rancho Cordova reference the Parkway Plan in their General Plans. The locally adopted Plan is then submitted to the State legislature for adoption through the *Urban American River Parkway Preservation Act,* Public Resources Code §5840. The Plan acts as an informational document and an invitation for citizen participation in the planning process. It also provides basic policy guidance for the future of the Parkway."

Following is a list of the Goals and Policies of the American River Parkway Plan that are being violated by this Project:

Policy 1.1 Balanced Management

1 The American River Parkway is a unique regional asset that shall be managed to balance the goals of controlling flooding; preserving and enhancing native vegetation, native fish species, the naturalistic open space and environmental quality within the urban environment; maintaining and improving water flow and quality; providing adequate habitat connectivity and travel corridors to support migratory and resident wildlife; providing recreational opportunities; and ensuring public safety.

The proposed project destroys vegetation, inhibits native fish species from reproducing, hinders habitat connectivity and diminishes recreational opportunities.

Terrestrial Resource Policies

Policy 3.2

2 Agencies managing the parkway shall protect, enhance and expand the parkway's native willow, cottonwood, and valley oak-dominated riparian and upland woodlands that provide important shaded riverine aquatic habitat (SRA), seasonal floodplain, and riparian habitats; and the native live oak and blue oak woodlands and grasslands that provide important terrestrial and upland habitats.

The proposed project not only does not enhance nor expand native species of trees, it removes them. Hundreds of the trees and acres of upland woodlands that shade and support the spawning areas for native fish will be removed, and not replaced.

Aquatic Communities Policies

3 Policy 3.7

The parkway shall be managed to preserve, protect and/or restore riparian and in-channel habitat necessary for spawning and rearing of fish species, including native Chinook salmon (fall-run), steelhead, and Sacramento splittail, and recreational non-native striped bass and American shad. Priority shall be on providing diversity and complexity of habitat, consistent with recreational safety needs.

The proposed project destroys habitat for native Chinook salmon and steelhead by replacing natural river rock and gravel with excavated quarry stone. The exact amount of destruction cannot be calculated due to the lack of data in the environmental reports.

Policy 3.8

It is the intent of this plan that available water provide adequate seasonal river flows and water temperatures to achieve and maintain viable populations and life stages of federal or state listed species, such as the Central Valley steelhead trout. In addition, species of primary concern include: naturally spawning Chinook salmon (fall-run) and Sacramento splittail; non-native American shad and striped bass; and their macroinvertebrate food sources in the lower American River.

The proposed project removes hundreds of trees that provide shade at the river's edge, thus lowering the water temperature to allow the early life stages of steelhead trout to survive.

Policy 3.11

Agencies managing the parkway shall identify, enhance and protect:

a areas where maintaining riparian vegetation will benefit the aquatic and terrestrial resources;
b current shaded riverine aquatic habitat; and
c other areas that can support a shaded riverine aquatic habitat, as time and resources permit, especially as associated with flood control or federally/state mandated species protection projects.

The proposed project destroys current shaded riverine aquatic habitat. The exact amount of destruction cannot be calculated due to the lack of data in the environmental reports.

Flood Control Policies

Policy 4.12

Vegetation in the parkway should be appropriately managed to maintain the structural integrity and conveyance capacity of the flood control system, consistent with the need to provide a high level of flood protection to the heavily urbanized floodplain along the lower American River and in a manner that preserves the environmental, aesthetic, and recreational quality of the parkway.

4

The proposed project destroys the structural integrity of the riparian vegetation that maintains the natural flood control system. Further, it destroys the aesthetic and outstandingly remarkable recreational quality that has earned the American River both a federal and state Wild and Scenic Rivers designation. The exact amount of destruction cannot be calculated due to the lack of data in the environmental reports.

Policy 4.16

Bank scour and erosion shall be proactively managed to protect public levees and infrastructure, such as bridges, piers, power lines, habitat and recreational resources. These erosion control projects, which may include efforts to anchor berms and banks with rock revetment, shall be designed to minimize damage to riparian vegetation and wildlife habitat, and should include a revegetation program that screens the project from public view, provides for a naturalistic appearance to the site, and restores affected habitat values.

The proposed project destroys habitat, social trail, beaches, watercraft access sites, fishing, and wildlife viewing areas. It also destroys acres of riparian vegetation and provides no mitigation to restore affected habitat and recreational values. Once again, the exact amount of destruction cannot be calculated due to the lack of data in the environmental reports.

I have chosen to focus my comments on the violations of the American River Parkway Plan, the management plan for the federal and state Wild and Scenic Rivers Acts. There are numerous other comments being submitted that carefully describe and document shortcomings of the environmental reports with respect to research, modeling, engineering, design, construction, and even public outreach.

Because of these violations of the American River Parkway Plan, this project MUST be halted, re-evaluated and re-designed. There is no emergency, our levees are not crumbling before our eyes. There is plenty of time to get more soil borings, run new hydrology models, engineer with nature, not against her, and design a more targeted, data driven, evidence-based project for the Contract 3B area. Involve the public by conducting in-person and on-line workshops and meetings. Since the Parkway is a regional asset, expand the public participation areas to include all of Sacramento County, and adjacent parts of Yolo, El Dorado and Placer counties. By working with affected agencies and the public that uses the Parkway on a regular basis, and employing the vast skills of the US Army Engineer Research and Development Center (ERDC), a project can be designed with a win-win-win outcome:

> Flood protection plus Erosion Control plus Preserving the American River Parkway, the Crown Jewel of Sacramento, for generations to come.

Sincerely,

Peter Spaulding

Mile Steward, Mile 11 South

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:54 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: annde ewertsen <ewertsen@yahoo.com>
Sent: Friday, February 23, 2024 4:18 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 an amazing resource. I challenge you to find anything similar in another city. My first experience with the river was in 1986, when my then boyfriend took me to see it. I was from out-of-state; he was born and raised in Sacramento. It was the first place he took me, and it was magical. I moved to Sacramento in 1987 and we made every effort to visit the river on a daily basis. In 1996, we bought a house across from Sara Park. We saw the realtor putting the sign in the ground when we were parking our car on our daily visit to the Parkway. Since purchasing the house, my family including my husband, our now-grown son and I spend at least a part of everyday enjoying the serene beauty and magnificence of the area. I walk the dog along the trails each morning and night. On the weekends, we take a 3 mile walk with the dog. We swim, kayak, and paddleboard weekly from late Spring to early Fall. My son learned how to fish there and ride his bike. He also developed a love of nature and an understanding of the natural order of things from this Parkway. I

can't even begin to imagine what my life and others in the neighborhood will do once it is bulldozed. The loss of habitat for the birds, beavers, river otters, deer, fish, turtles, and coyotes is beyond comprehension. A number of trees in the area are hundreds of years old. This area will never--not in my lifetime or those of my great-grandchildren--be a refuge and place of beauty, if this project goes through as planned.

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 include the following:

B

***loss of habitat**
***loss of heritage oak trees and other vegetation**
***inability to access the water**
***air pollution**
***reduction of tree canopy, which increases temperatures and enhances not diminishes climate change concerns**
***denuded the area instead of further investigating nature-based solutions**

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.

Annde Ewertsen

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:43 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

-----Original Message-----
From: Amy Pine <amypine76@hotmail.com>
Sent: Friday, February 23, 2024 4:19 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'm a frequent long distance runner along the parkway. For over 30 years, I have run along this amazing trail several times a week and get to take in the beauty of the river and what surrounds it: trees, wildlife, the serenity of it all. Many times, it's an escape and can be my therapy. I've spent many hours and many miles and seeing so much destruction of the area and wildlife get displaced, is just heartbreaking.

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.

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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.

[NAME]

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:43 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

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From: Shulamit Shroder <shulamit.shroder@gmail.com>
Sent: Friday, February 23, 2024 4:16 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):

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 project threatens the work many have done to make this section of the Lower American River the most iconic, swimmable river in the Country.***

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. If the project proceeds as planned the project will cause significant impacts economically, ecologically and disparately to adjacent communities, making this project environmentally unjust and racially inequitable. In addition, the project will affect communities outside the local area, as many events and tourists use this area to recreate (and will go elsewhere for many years). Migratory wildlife will be significantly affected, too, from the removal of habitat and shaded riparian areas. Finally, this will increase human contribution to climate change due to reduced bike commuters and an increase of urban heat island effect during and beyond the construction window.

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 impacting 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.

Questions:

(1) have you done a community centered economic and health analysis of the proposed solution using racial demographically disaggregated community data? What was your method and does it consider cumulative impacts like air pollution, heat island effect, mental health and other drivers?

(2) does the project as proposed align with studies the Corps of Engineers has produced over the last two decades showing trees can be both helpful to levee strength as well as potential risks for levee failure? Based on what we saw in River Park it seems like the current thought is that virtually any and all trees on levees and within floodplains are considered a risk that needs to be mitigated.

(3) do you have up to date user data for this reach and surrounding parkway, including data on swimmers and boaters? Would it be possible to synthesize demographic or economic data to help the communities impacted have a better sense of the value of their losses?

Thank you,

Shulamit Shroder

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:43 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] TIME SENSITIVE: Please help ensure a better USACE Proposal for American Rive 3B

From: LESLIE WATTS <leslie.watts@prodigy.net>
Sent: Friday, February 23, 2024 4:14 PM
To: BellasE@saccounty.net; SorgenKC@saccounty.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>; publiccommentarcf16@water.ca.gov
Cc: richdesmond@saccounty.gov
Subject: [Non-DoD Source] TIME SENSITIVE: Please help ensure a better USACE Proposal for American Rive 3B

Dear Chairperson and Members,

1 Without a doubt, you are aware that community advocates of American River Trees (americanrivertrees.org), are reaching out to ask that US Army Corps of Engineers (USACE) proposed contracts 3B and 4 for "bank erosion protection" to the Lower American River between Howe Avenue and the Mayhew Drain be entirely reconsidered.

2 I am writing to ask that the Sacramento Regional Parks and the American River Parkway Advisory Committee work with USACE to revise the proposal and not proceed until a more targeted and less destructive approach is developed. **USACE must extend the public comment period, currently TODAY at 5:00 p.m., until further consideration is given.**

3 We request that you 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 (including heritage oaks) and vegetation to keep residents safe from future flooding potential have spoken up and require respectful responses.

4 I wish to cite the **Sacramento County American River Parkway Plan 2008**; County of Sacramento Municipal Services Agency Planning and Community Development Department. 2008. Accessed online 2023/02/23
https://regionalparks.saccounty.gov/Parks/Documents/Parks/ARPP06-021909_sm.pdf
Flood Control Policies

5 4.0 Water flows, water quality and flood control Water Flow Policies Water Flow Policies

4.1 It is the intent of this Plan that available water flows protect the lower American River ecosystems and recreational resources. These resources include water quality, appropriate water temperatures, waterway recreation, aesthetics, riparian vegetation, fisheries and other aquatic species, wildlife and other river-dependent features and activities. Flow policies shall include the minimum flows in the flow regime consistent with Lower American River Flow Management Standard (LARFMS) as identified in the 2006 Bureau of Reclamation, U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Game and Water Forum draft technical report or in substantial conformance with that standard.1

1 Note: A flow management standard for the LAR has been developed by the Water Forum in cooperation with the U.S. Bureau of Reclamation and state and federal resource agencies. In 2006 agreement was reached on the flow management standard, which includes a flow regime, water temperature objectives, river monitoring and a river management group to implement the standard.

Flood Control Policies (continued)

5 4.12 Vegetation in the Parkway should be appropriately managed to maintain the structural integrity and conveyance capacity of the flood control system, consistent with the need to provide a high level of flood protection to the heavily urbanized floodplain along the lower American River and in a manner that preserves the environmental, aesthetic, and recreational quality of the Parkway.

6 4.16 Bank scour and erosion shall be proactively managed to protect public levees and infrastructure, such as bridges, piers, power lines, habitat, and recreational resources. These **erosion control projects**, which may include efforts to anchor berms and banks with rock revetment, **shall be designed to minimize damage to riparian vegetation and wildlife habitat, and should include a revegetation program that screens the project from public view, provides for a naturalistic appearance to the site, and restores affected habitat values**. *(emphasis added)*

4.17 Projects to address bank stabilization and erosion that are threatening privately-owned structures shall secure appropriate permits. **The engineering of these projects should give preference to biotechnical or non-structural alternatives, where feasible**, over alternatives involving revetments, bank re-grading, or installation of river training structures. Use of rubble, gunnite, bulkheads and similar material in these projects is prohibited. *(emphasis added)*

I urge you to stand up for this special stretch of the American River Parkway consistent with your ethos, and to make a determination of “inconsistency” with the Wild and Scenic Rivers Act, and to impose strong conditions that require the USACE to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B. Exploring "Engineering with Nature" at https://ewn.erdc.dren.mil/ is not an unreasonable request to make.

Thank you for your time and consideration.
Leslie A. Watts

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:42 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

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From: Susan Solarz <solaking19@gmail.com>
Sent: Friday, February 23, 2024 4:10 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; Desmond. Rich <desmondrf@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) Comment Recipients:

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. I am writing to express my serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis. While I certainly recognize the importance of flood protection, I want to bring to your attention that we can achieve this objective in a way that is more protective of our environment.

The American River is extremely important to me. I live north of the American River within a short distance from the proposed Contract 3B North Site 4-2. I walk regularly on the river, especially on the trails between Watt Avenue and my home, a mile east of Rio Americano High School. I chose to live where I do because I can walk to the American River. I also am a docent at the nearby Effie Yeaw Nature Center, where I work with students and members of the public to learn about and experience the beauty and the significance of the wildlife and habitat of the American River. I recognize the rich biodiversity of the American River, including serving as a migration pathway for many bird and salmonid fish species. I observe beaver, otter, coyote, and deer as well as countless endemic and migratory bird species.

I have an educational background in environmental science and engineering, public health and biology from UCLA, and spent my 30 year career as an environmental scientist with the State of California Cal-EPA.

I value protection of the American River as a national Wild & Scenic River and under the Lower American River Conservancy as well as the American River Parkway Plan. I am particularly concerned about the potential impact of the vegetation removal to wildlife habitat of the American River.

Below are some of my key concerns:

1 **Limited Evidence for Extensive Removal of Trees and Vegetation for Erosion Control:** I do not support the devastating methods being proposed to address potential bank erosion concerns. Trees and vegetation provide natural armoring of the banks that would be eliminated. **Better understanding and methods for implementing nature-based solutions exist. The U.S. Army Corps has endorsed an Engineering with Nature program. It appears that these guidelines need to be incorporated here.**

When the Folsom Dam raise is complete, the work may be unnecessary. Modeling cited in SAFCA's Final Urban Level of Flood Protection Plan indicates that the maximum discharge for a 200-year flood would not exceed 115,000 cfs rather than 160,000 cfs cited as the basis for this project.

2 **Impact on Wildlife and Critical Habitats:**
The substantial loss of shade from the mature canopies along the river's edge may lower the survival rate of various species of salmonids as well as potential reductions of aquatic invertebrates. Extensive vegetation removal would disrupt the nesting, mating, and feeding habits of local and migratory bird populations.The petition for listing the western pond turtle imposes additional requirements on the environmental analysis and mitigation.These impacts are potentially longer term because the vegetation will take years to return. Creating mitigation in an alternate location is not an adequate substitute for the interconnectedness of this significant wildlife corridor.

3 **Recreational Access/Mental Health/Environmental Justice:**
This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Natural settings decrease anger, anxiety, and depression; and increase restoration and tranquility. The U.S. Department of Health and Human Services states that the lack of green space is one of the most important causes of childhood obesity, and the need for green places to protect children's health is becoming more recognized and apparent.

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

As Local Residents We Do Not Want What We See Near Sacramento State University (Contracts 1 and 2) What we see is a project that fundamentally and perhaps irrevocably alters the landscape, changing the aesthetics, its biological value, reduction in potential for carbon sequestration, and recreational (perhaps even economic) value for our community.

Sincerely,
Susan Solarz

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:41 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features SEIS/SEIR

-----Original Message-----
From: jasmine@shahbandi.com <jasmine@shahbandi.com>
Sent: Friday, February 23, 2024 4:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features SEIS/SEIR

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):

I am writing to express my 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.

A As a professional interpreter working with immigrants adapting to Sacramento life, I can attest to the fact that visting the American River Parkway is a tremendous source of healthy, inexpensive recreation for immigrant families. The enjoyment of nature crosses all language barriers. When people enjoy nature in proximity, they form common bonds. The American River Parkway provides an incredible environment for such opportunities, so it is very shocking to see the USACE reducing the American River Parkway to a lifeless ditch, just so that the area might possibly have a decreased risk of bank erosion.

I object to the destruction of over 500 trees in Contract 3B-south, potentially including heritage oaks over 300 years old. Similar trees will never again attain such longevity in a few shallow feet of soil over jagged, quarry riprap and therefore, I urgently ask that the USACE perform a more appropriate environmental analysis of the significant impacts of their proposed project and its subcomponents. I ask that the USACE not go forward with the subcomponents of Contracts 3B and 4 until a targeted and less damaging approach to Erosion Control Projects 3B and
4 is designed. Future erosion control projects should be required to have a more targeted analysis and approach.

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. An analysis of alternative methods for a more surgical, fine-grained approach has not been presented.

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 as a “Protected Area”
under the American River Parkway Plan. The proposed actions under USACE Contract 3B will alter this protected and irreplaceable regional treasure for current residents and for future generations. I ask that USACE planning better reflect the respect that the American River Parkway deserves.

Thank you.

Jasmine Shahbandi

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, February 26, 2024 10:36 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Corps Flood Protection Project slated for the American River

Follow Up Flag: Follow up
Flag Status: Completed

From: Ed Harper <calidris@surewest.net>
Sent: Friday, February 23, 2024 4:07 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Corps Flood Protection Project slated for the American River

To Whom it may concern:

1 I am shocked by the poorly drafted project replete with errors that is designed for the American River Parkway. Furthermore, there has been little opportunity, given the time restraints, to sufficiently address the slated project. The community deserves to have their concerns addressed. Surely there is overwhelming opposition to the project as it is presently outlined. We value our riparian areas and the American River Parkway is a living jewel. The

2 trees that define the area must be treasured, not destroyed. The U. S. Army Corp should be actively working to protect and restore vital riparian areas rather than destroying them. Given our knowledge about climate change, we know how essential trees are. Riparian corridors provide essential habitat to the vast majority of birds and terrestrial mammals. Destroying trees along the American River would have a profound and deleterious impact to the salmon

3 fishery since trees help keep the waters cooler, provide food resources for young salmon, and enhance habitat and survival of young salmon.

Please keep in mind "No natural landscapes of California have been so altered by man as its bottomlands" (Bakker 1972). The once-lush riparian forests, forming natural vegetation corridors along many of the Central Valley's watercourses, are mostly gone today. These forests were, in Thompson's words, ". . . modified with a rapidity and completeness matched in few parts of the United States" (Thompson 1961).”

Please listen to my pleas. No destruction to our valued riparian areas of the American River Parkway.

Sincerely,

W. Edward Harper

INDIV-784

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

jessica epperson <epperson.wiseman@gmail.com>

Fri 2/23/2024 11:39 AM

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

[Some people who received this message don't often get email from epperson.wiseman@gmail.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.

Sent from my iPhone

INDIV-785

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

Keri Miner <handwing2011@yahoo.com>

Thu 2/22/2024 2:37 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 handwing2011@yahoo.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.

Keri Miner

INDIV-786

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

Laurel G Larsen <laurel@berkeley.edu>

Thu 2/22/2024 11:58 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 laurel@berkeley.edu. Learn why this is important

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 as a resident of River Park, Sacramento, and a daily visitor to the Lower American River Parkway to ask that you and the Board work with the US Army Corps 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.

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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.

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Thank you.

Laurel G. Larsen, PhD (she/her)
Associate Professor, Depts. of Geography and Civil & Environmental Engineering, UC Berkeley

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INDIV-787

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

max hall <maxjmhall@gmail.com>

Fri 2/23/2024 9:51 AM

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

[Some people who received this message don't often get email from maxjmhall@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

Dear President Dolan and Members of the Board and Staff:

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

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

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

Thank you.
Max Hall

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

Melina Cacciurri <cacciurri@gmail.com>

Thu 2/22/2024 10:26 PM

To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;BellasE@saccounty.net <BellasE@saccounty.net>; SorgenKC@saccounty.gov <SorgenKC@saccounty.gov>;Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>; Barbara_Rice@nps.gov <Barbara_Rice@nps.gov>;hbwillia44@gmail.com <hbwillia44@gmail.com>; RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>;PatHume@saccounty.gov <PatHume@saccounty.gov>; SupervisorKennedy@saccounty.gov <SupervisorKennedy@saccounty.gov>;SupervisorSerna@saccounty.gov <SupervisorSerna@saccounty.gov>;SupervisorFrost@saccounty.gov <SupervisorFrost@saccounty.gov>; Matthew.Ceccato@mail.house.gov <Matthew.Ceccato@mail.house.gov>;repamibera@mail.house.gov <repamibera@mail.house.gov>

You don't often get email from cacciurri@gmail.com. Learn why this is important

Forwarding my message to USACE, please support the citizens of Sacramento

---------- Forwarded message ---------
From: **Melina Cacciurri** <cacciurri@gmail.com>
Date: Thu, Feb 22, 2024 at 10:18 PM
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>

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 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, bird watching 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 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:

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

Trees are not a significant risk to levee stability. In fact, trees and vegetation provide self-renewing natural armoring of the banks that would be eliminated. Removing trees may make us less safe.

Historically, levee failures were more associated with areas where riparian forests had been thinned or clear-cut.

Inadequate environmental analysis of the removal of 200+ years old heritage oaks would constitute an "unmitigable" impact on the visual and aesthetic resources of the Parkway

Destruction of vegetation worsens the heat island effect.

"Access ramps" will destroy additional trees but were not accounted for in the draft

SEIS/SEIR.

2. Rip Rapped streambanks present significant negative consequences:

Shorelines composed of large, angular rock make access by people for swimming, fishing, birdwatching, watercraft deployment, and other uses dangerous at worst and highly unpleasant at best.

The river's Wild and Scenic designation is compromised by a rigid, artificial shoreline. Riprapped shorelines are ugly and detract from the natural feel of the Lower American River that makes it such a special place and refuge in our city and area.

Riprap hinders natural riverbank vegetation growth, and stifles tree growth. Heritage trees would be forever lost.

The planting benches being proposed on top of the launchable rock toes and trenches will likely collapse ("launch") when the launchable rock toes and trenches eventually launch. No provisions or commitments have been made to replace lost planting benches.

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

Experts disagree about the erosion risk along this stretch of the river. More empirical data was recommended, but generally concluded that erosion resistant material was present and significant scour below it was not anticipated. Seepage data show no issue for seepage, especially after the deep slurry walls were added inside the levees.

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The improvements to weirs and bypasses, and the new spillway at Folsom dam and new operating protocols allow for better managing of flows, including earlier release of water when storms are forecast.

4. Impact on Wildlife and Critical Habitats:

The biodiversity of this ecosystem is complex and interconnected and is heavily used by wildlife

Clear-cutting and rip rapped streambanks pose a threat to critical habitats for various fish species, including Chinook Salmon, Central Valley Steelhead, and North American Green Sturgeon.

Clear-cutting disrupts the nesting, mating, and feeding habits of local and migratory bird populations.

Large, mature trees provide essential nest cavities that would be lost.

The substantial loss of shade from the mature canopies along the river's edge may lower the survival rate of various species of salmonids.

The petition for listing the western pond turtle imposes additional requirements on the environmental analysis and mitigation.

High levels of noise and vibrations will disturb natural animal behaviors such as nesting, spawning and feeding activities

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This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths in the forest and beaches along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Why should we think that the Corps will do anything different than at River Park, where all of these features such as mature trees, beaches, footpaths, etc., appear to have been destroyed? Sac State is used as a restoration example, but we know of no beaches, footpaths, fishing access points there, either. Why should we trust that 3B will be different when even the SEIS/SEIR does not address these issues?

Installation of miles of angular rock (riprap) will make river access dangerous along

large stretches of river, and will greatly impede swimming, fishing, and deployment of watercraft such as kayaks. This will be a permanent and significant loss of irreplaceable recreational amenities to the community that is not accounted for in the SEIS/SEIR, despite promises by the Corps in 2016 to address these significant issues.

The permanent loss of mature trees, beaches, river access points, footpaths, and other recreational amenities is not “less than significant” as stated in the SEIS/SEIR. The Corps needs to document these losses and redo the SEIS/SEIR to account for them, including proposals to modify the project where possible to minimize losses.

The public has a right to know how specific recreational amenities will be affected by this project. The level of detail in the SEIS/SEIR makes it impossible for the public to see what will be done, and all we can assume is everything in 3B upstream of Watt Avenue on the south side will be ripped out like at River Park. The public has a right to know the details at this stage of review and should not be required to “trust” the Corps. We want the Corps to document and justify specifically which of our trails, trees, beaches, fishing access, and riparian forest must be destroyed to keep us safe from floods, and how much of that destruction will be replaced, versus what will be lost permanently given current design.

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10. More Important Risks and Impact to our flood risk such as the sale of the Kassis property to developers are not being addressed ahead of this. Kassis property development by Trumark Homes.
https://www.sarariverwatch.org/kassis_property_easements

I am extremely concerned about the terrible blight that has been created in the River Park area of Sacramento and implore you to find more sustainable solutions, if you can prove they are in fact, necessary.

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.

Melina Cacciurri

INDIV-789

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

Melina Cacciurri <cacciurri@gmail.com>

Thu 2/22/2024 10:39 PM

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

Some people who received this message don't often get email from cacciurri@gmail.com. Learn why this is important

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.

Melina Cacciurri

INDIV-790

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

Melina Cacciurri <cacciurri@gmail.com>

Thu 2/22/2024 10:26 PM

To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;BellasE@saccounty.net <BellasE@saccounty.net>; SorgenKC@saccounty.gov <SorgenKC@saccounty.gov>;Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>; Barbara_Rice@nps.gov <Barbara_Rice@nps.gov>;hbwillia44@gmail.com <hbwillia44@gmail.com>; RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>;PatHume@saccounty.gov <PatHume@saccounty.gov>; SupervisorKennedy@saccounty.gov <SupervisorKennedy@saccounty.gov>;SupervisorSerna@saccounty.gov <SupervisorSerna@saccounty.gov>;SupervisorFrost@saccounty.gov <SupervisorFrost@saccounty.gov>; Matthew.Ceccato@mail.house.gov <Matthew.Ceccato@mail.house.gov>;repamibera@mail.house.gov <repamibera@mail.house.gov>

You don't often get email from cacciurri@gmail.com. Learn why this is important

Forwarding my message to USACE, please support the citizens of Sacramento

---------- Forwarded message ---------
From: **Melina Cacciurri** <cacciurri@gmail.com>
Date: Thu, Feb 22, 2024 at 10:18 PM
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>

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 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, bird watching 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 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:

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

Trees are not a significant risk to levee stability. In fact, trees and vegetation provide self-renewing natural armoring of the banks that would be eliminated. Removing trees may make us less safe.

Historically, levee failures were more associated with areas where riparian forests had been thinned or clear-cut.

Inadequate environmental analysis of the removal of 200+ years old heritage oaks would constitute an "unmitigable" impact on the visual and aesthetic resources of the Parkway

Destruction of vegetation worsens the heat island effect.

"Access ramps" will destroy additional trees but were not accounted for in the draft

SEIS/SEIR.

2. Rip Rapped streambanks present significant negative consequences:

Shorelines composed of large, angular rock make access by people for swimming, fishing, birdwatching, watercraft deployment, and other uses dangerous at worst and highly unpleasant at best.

The river's Wild and Scenic designation is compromised by a rigid, artificial shoreline. Riprapped shorelines are ugly and detract from the natural feel of the Lower American River that makes it such a special place and refuge in our city and area.

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Thank you.

Melina Cacciurri

INDIV-791

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

pscorcoran827@gmail.com <pscorcoran827@gmail.com>
Fri 2/23/2024 12:46 AM
To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>
Cc:Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>

[Some people who received this message don't often get email from pscorcoran827@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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And, I respectfully request that your Board:
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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.

Patrick Corcoran

Sent from my iPhone

INDIV-792

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

Sarah Strand <scstrand@gmail.com>
Thu 2/22/2024 9:34 PM
To:Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>
Cc:Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>

Some people who received this message don't often get email from scstrand@gmail.com. Learn why this is important

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 that this goal be accomplished now.

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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.

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Thank you.
Sarah Strand
Gulfport Way

INDIV-793

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

Sarah Strand <scstrand@gmail.com>

Thu 2/22/2024 9:27 PM

To:ARCF_SEIS@usace.army.mil <ARCF_SEIS@usace.army.mil>
Cc:DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>;Knapp, Jonah@CVFPB <Jonah.Knapp@cvflood.ca.gov>;BellasE@saccounty.net <BellasE@saccounty.net>;SorgenKC@saccounty.gov <SorgenKC@saccounty.gov>;Susan_Rosebrough@nps.gov <Susan_Rosebrough@nps.gov>;Barbara_Rice@nps.gov <Barbara_Rice@nps.gov>;hbwillia44@gmail.com <hbwillia44@gmail.com>;RichDesmond@saccounty.gov <RichDesmond@saccounty.gov>;PatHume@saccounty.gov <PatHume@saccounty.gov>;SupervisorKennedy@saccounty.gov <SupervisorKennedy@saccounty.gov>;SupervisorSerna@saccounty.gov <SupervisorSerna@saccounty.gov>; SupervisorFrost@saccounty.gov <SupervisorFrost@saccounty.gov>;Matthew.Ceccato@mail.house.gov <Matthew.Ceccato@mail.house.gov>;repamibera@mail.house.gov <repamibera@mail.house.gov>

You don't often get email from scstrand@gmail.com. Learn why this is important

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.

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

INDIV-794

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

Barbara Beeman <butterfingrz@gmail.com>

Fri 2/23/2024 11:33 AM

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

Some people who received this message don't often get email from butterfingrz@gmail.com. Learn why this is important

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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.

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Thank you.

Barbara Beeman

INDIV-795

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

brian agnell <daredevilcourier@yahoo.com>

Fri 2/23/2024 5:41 AM

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 daredevilcourier@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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

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Thank you.

Brian Agnell
Owner
Bizfox
Apostille & Notary •

INDIV-796

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

Charles <mlbccd@comcast.net>
Thu 2/22/2024 10:43 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 mlbccd@comcast.net. Learn why this is important

Dear President Dolan and Members of the Board and Staff:

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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.

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Thank you,
Charles C. Dallas

INDIV-797

[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]

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Thank you.

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Friday, February 23, 2024 5:06 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: C3B Comments

From: MHI Gtkpr <mhigtkpr@gmail.com>
Sent: Friday, February 23, 2024 5:00 PM
To: Guy.K.Romine@usace.army.mil; Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Cc: Peter Spaulding <petenyvtca@comcast.net>
Subject: C3B Comments

You don't often get email from mhigtkpr@gmail.com. Learn why this is important

Mr. Guy Romine
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814
Guy.K.Romine@usace.army.mil

Mr. Josh Brown
Central Valley Flood Protection Board/California Dept of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, California 95821
Josh.Brown@water.ca.gov

Submitted via email: ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

February 23, 2024

Re: December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Dear Mr. Romine and Mr. Brown:

Thank you for the opportunity to comment on the reports pertaining to this important project.
I am a lifelong naturalist, bird watcher, photographer, and the daughter of a professional artist and an engineer, who channeled capacity for innovation with tangible problem solving into specialization as a physiatrist, with a concentration on catastrophic care and care coordination. I am also a nationally recognized expert on Environmental Health, and in

particular, the adverse impacts of disasters upon vulnerable populations. My NFP, the Multicultural Health Institute represents thousands of vulnerable individuals and communities across the country. My daily work involves preventing, educating about and treating catastrophic injuries and teaching health systems about preparation and response to environmental disasters for vulnerable communities..

Any good clinician knows the importance of clinical judgement, lifelong commitment to learning and acquisition of "clinical experience" to apply to achieve greater success in subsequent cases and scenarios, while also exercising, at times, independent critical analysis and decision making for the best outcomes.

When I diagnosed my own mother with lung cancer, after failure of the disconnected health care system to do so, the standard of treatment at that time was annihilation of the patients' immune system with potent chemotherapeutic agents with the hope that the more rapidly dividing malignant cells would be more adversely impacted than the 'acceptable collateral damage" of healthy tissue. Dire side effects and poor outcomes did not deter such approaches for decades, it is what medicine had to work with.

We stepped right past that, and were able to secure a variety of treatments for her only just emerging at that time nearly 2 decades ago, but far more logical-targeting the invading abnormal cancer cells, without pulverizing and paralyzing the entire immune system, permitting her own defenses to help fight back. Knowing she had survived pneumonia as a child in pre-antibiotic era, we knew she had a very strong immune system, and it was so, defying all odds, she not only beat slim odds to make 5 years, going to prolifically to enjoy nearly 3 x that amount of extended quality of life.

Yet ironically, speaking of antibiotics, due to their wanton overuse, we have cultivated armies of resistant microbes, and in some places, physicians have gone full circle, resorting to more "natural approaches" to treat minor infections, with better outcomes, rather than excessive prescribing of antibiotics and cultivating more and more resistance.

The analogy is-nurture nature, work together with and play to strengths. Thus in the case of the decimation of the carefully balanced ARC ecosystem that has evolved over millennia, such folly will end in similar results as my mother's unfortunate elder sister and many others who only had the options of brute force destruction of their natural defenses in attempt to blunt the progression of their cancers before new thought/innovative approaches and international collaborations produced far better options.

My motivation to live near the incredible jewel of the American River Parkway is similar to that of my neighbors, most of whom share a sense of caretaking devotion for the privilege of living near and being able to enjoy this unique, nationally recognized, well studied and treasured ecosystem. The engineer daughter that grew up on an island part of me carefully studied the history and risks of living so close to the river, and I was and remain quite reassured that we are and have been on the safest, straightest, widest low flow stretch, in large part due to the natural defenses that exist and have been proven to WORK WELL over time. In medicine, "1st Do No Harm" is a very useful adage to follow, same with regard to this project.

As part of my consulting work, I perform complex analyses of forensic cases, considering all sides as an Agreed Medical Examiner, to produce an objective set of recommendations and conclusions. In analyzing available data and speaking with neutral and objective engineers and water experts who do not stand to benefit from whatever final outcome of the C3B project, they echo and confirm the following factual evidence:

1
1. There is little to no historical precedence of trees being a risk factor for levee stability, in fact, removing them has served to destabilize other levee projects and we all know it takes not just years, but decades and centuries to re - establish complex Riparian habitats.
2. The removal of large heritage oak trees and other habitat along the levee so that rock/riprap can be placed is a costly and unnecessary action, these trees already provide erosion protection along the levee.

2
3. Erosion is a minute concern, and as has been tested repeatedly in the C3 and C3b sections, nature restores loss through gradual recession of high waters in a majestic and breathtaking display of balance between the trees, vegetation and water cycles. For example, during the floods of 1997 and high water levels last winter, the flow rates along the levee were nearly stagnant with higher flows towards the center of the river channel, well away from the levee. Recovery during receding flows was rapid and well complete.

3
4. Such flows occur infrequently, are of short duration and will be further abated by the new spillway at Folsom Dam.

4
5. Removal of well matured, compacted soils replacing with alternatives based on soil samples from other locations not reflective of unique qualities of this location will result additional failed plantings (status update on prior areas

welcomed) and further washing away and exposure of dangerous jagged rocks as has already happened in denuded areas downstream.

5 6. There is acknowledged risk to environmentally threatened species and their habitats, and the risk vs Benefit is insufficient to justify proceeding with clear cutting a stable, and previously deemed stable with no need for intervention, section of the river parkway.

6 7. Working with the natural inclinations and defenses of the river, rather than literally undermining them by tearing out historic and protected old grown Heritage Oaks and other layers of the forest, will continue and ensure stabilization and enjoyment for continued generations of humans and wildlife to come.

7 8. It is the 50th anniversary of the endangered species act, and we averted mass death and destruction of habitats, and species, however, we know significant threat continues. Every effort must be made to keep balance and preserve rare urban reserve sites such as targeted 4, C3 and C3b North and South sections of the river.

8 9. This action is likely to further adversely affect critical habitat and threatened species including the Chinook Salmon, Central Valley Steelhead, North American Green Sturgeon, Long Horn Beetle ("mitigated" Elderberry bushes from other sections mostly dead/dying off, failed effort) as well as hundreds of local and migratory bird populations whose nesting, mating and feeding habits will be disrupted by noise, habitat destruction and greater vulnerability to predators.

9 10. 2023 was the hottest year on record, Sacramento was sweltering, however near the river, we were always benefitting from the breezes and cooling effect of the trees and vegetation through shade and transpiration, losing that will worsen the "heat island effect" with adverse population health consequences. The IRA seeks to mitigate the adverse effects of heat, it is illogical to contribute to worsening life threatening conditions in the name of preventing a problem that does not exist-erosion.

10 11. This area is prioritized for recreational access and enjoyment by the public for kayaking, fishing, bird watching, fishing, wading with dogs, nature photography, spiritual practices, all of which will be severely interrupted and access forever limited by replacement of accessible shoreline beach with jagged rocks of uncertain source.

11 12. Communities with strong cohesive social connection and exposure to nature are hallmarks of well touted "blue zones" around the world. It is well documented that even in economically limited resourced communities, people live longer, healthier and more satisfied lives when there are strong social connections, regular physical activity and connection to the natural world. Average blood pressures are lower, there is lower incidence of Diabetes and other autoimmune disorders and life expectancy is longer. This is why, despite having lived and worked in a variety of other beautiful and desirable national and international locations, I repeatedly return to enjoy my home in College Greens East, and the American River Parkway adjoining our community is central to that. There are decades of neighbors and intergenerational family connections creating a rich fabric of support, celebration of life contributing to great resilience, improved health and mental health for us all. Destruction of this may contribute to destruction of decades of such relationships as well, with resultant destabilization and adverse mental health and health effects.

12 13. The Elementary school and its activities as well as the Larchmont Park are other extremely active components of healthy and happy community life. This area is used year round by youth groups, intramural sports teams, multicultural communities enjoying the playground and socializing with their children, dog walkers and tennis and pickleball players. Heavy equipment rumbling through with clouds of dust, diesel, vibrations, destruction of the beautiful vista at the end of the park and possible further destabilization of the levee in order to put in a few extra rocks along the edge seems an incredible waste of resources and unnecessary disruption in community life.

14. I have already treated a patient who was out walking with her family in the recently "improved" areas near Sac State, the sandy inadequately reinforced levee gave way underneath her, causing her to tumble down and onto the jagged rocks, sustaining fractures, lacerations and head trauma. Sad irony that an intervention meant to protect the public leads to greater risk and further restriction from doing what I like to see as a physician-exercising, managing stress through peaceful interaction with natural surroundings, breathing healthy air and generally enjoying themselves.

Thus on behalf of my community, which includes humans as well as the myriad forms of wildlife and vegetation, we urge the Army Corps to reconsider the further work on the American River Parkway. This parkway is a nationally designated wild and scenic area heavily enjoyed by the public and safe habitat for endangered and threatened species that shall be severely degraded including as noted:

Alicia E. Kirchner
Chief, Planning Division
U.S. Army Corps of Engineers
1325 J Street
Sacramento, CA 95814-2922

Re: Endangered Species Act Section 7(a)(2) Biological Opinion, Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response for the American River Watershed Common Features General Reevaluation Report Reinitiation 2020

Enclosure

cc: 151422-WCR 2020-SA00019

Andrea Meier, Andrea.J.Meier@usace.army.mil
Rena Eddy, Rena.Eddy@usace.army.mil
Robert Chase, Robert.D.Chase@usace.army.mil

Endangered Species Act (ESA) Section 7(a)(2) Biological Opinion and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response

American River Watershed Common Features General Reevaluation Report

NMFS Consultation Number: WCRO-2020-03082

Action Agency: United Stated Army Corps of Engineers

Affected Species and NMFS' Determinations:

ESA-Listed Species	Status	Is Action Likely to Adversely Affect Species?	Is Action Likely To Jeopardize the Species?	Is Action Likely to Adversely Affect Critical Habitat?	Is Action Likely To Destroy or Adversely Modify Critical Habitat?
Central Valley spring-run Chinook Salmon ESU (*Oncorhynchus tshawytscha*)	Threatened	Yes	No	Yes	No
California Central Valley steelhead DPS (*O. mykiss*)	Threatened	Yes	No	Yes	No
Southern DPS of North American green sturgeon (*Acipenser medirostris*)	Threatened	Yes	No	Yes	No

Sacramento River winter-run Chinook salmon ESU (*O. tshawytscha*)	Endangered	Yes	No	Yes	No

Fishery Management Plan That Identifies EFH in the Project Area	Does Action Have an Adverse Effect on EFH?	Are EFH Conservation Recommendations Provided?
Pacific Coast Salmon	Yes	Yes

Consultation Conducted By: National Marine Fisheries Service, West Coast Region

Cathy Marcinkevage
Assistant Regional Administrator for the California Central Valley Office

Date: May 12, 2021

I take issue with the following purported minimal impacts extracted from the 2016 and supplemental 12.2023 SEIR including :

- changes in scenic view and existing visual character,
- creation of new sources of substantial light and light pollution,
- conflicts with existing environmental standards including violation of air quality standards
- increased noise,
- increased vibrations,
- destruction of culturally and spiritually significant areas,
- interruption and contamination of optimal storm and groundwater management

Only “partial compliance” ? How can you be in full compliance when identified Hawks and Eagles are trying to nest in area being disrupted and a historic location is going to be dug up and irrevocably disfigured?

We request objective Peer review and further modification or elimination of any planned activities as intended for:

Supplemental SEIR continues to admit:

The following are photos and general questions .

high water and dry

Last winter the water was elevated and covering the trail behind where I am standing in this picture. With the wide berm, trees, there was very slow or almost no flow. See how placid it is in the photo above.

Once the surge stopped, the levels receded quickly, sucked up by the well established vegetation, none of which was lost even though several feet of trunks were submerged during the event.

This has been repeatedly observed throughout the years.

I have walked this trail over 35 years

Part of the beauty is the timeless unchanging nature, hard clay, no erosion.

Compare proposed well vegetated and armored 3B on the chopping block for clear cutting in area previously reinforced, stable, previously noted not requiring intervention

with area of intervention near Sac State with sandy already eroding areas, and still not growing in vegetation, no trees in sight, grasses not taking, soft, sandy hard to walk on unsightly soft muddy wasteland barren regions.

What was the justification of cutting well established trees BEHIND the levee? How sad and unseemly and now will be termite palaces, eroding the previous armoring root systems of beautiful shade rendering, carbon neutralizing tree cover that also helped neutralize toxics and air pollution from heavily trafficked H Street bridge. Yet a small band of trees was kept on the ridge at back of the park for “park like” esthetics? But that doesn’t work because the fences, barriers, greatly limit access and are further visually unappealing/.

Additional Questions:

Please explain:

https://www.noaa.gov/sites/default/files/legacy/document/2020/Oct/07354626787.pdf

What is the status of 10-15 year monitoring?

" In 2003, the Corps worked with local, state, and federal agencies to develop a project that established approximately 650 linear feet of shaded riverine aquatic (SRA) habitat at RM 2.4L. The habitat is now under active maintenance by a landscaping contractor and this site will be monitored for 1 0–15 years after planting. "·

Engineering and Hydrology Concerns:

In stark contrast to other sections of river, this basically straight section has proven to resist observable erosion or scour during flood control releases comparable to the new 160 kcfs emergency design flow (eg, 1964's 115 kcfs, 1986's 134 kcfs, 1997's 110 kcfs, & 2017's 80 kcfs releases), as witnessed by local residents and river experts. For this stretch, what, if any, physical observations or measurements does USACE have of either river velocities or erosion at or near the river bank (eg, photographs, video, velocity measurements), or is USACE relying entirely or almost entirely on model simulation output for this large scale tree and habitat removal project?

Please explain if the modelling of Safca and observed river behavior demonstrates low flow rates along the border of the river, what modelling is being used to justify high flow velocity requiring erosion control?

Safca Modelling at new maximum flow 160 shows that velocities along the edge of the bank during high water events is extremely slow 0-2ft/second,That is not considered enough to cause erosion , so how can you explain why that makes the bank is more susceptible to erosion to justify removing 500 trees?

History and modern numerical flow modeling both show that removal of vegetation, or roughness, along river banks increases river velocity at the river banks. If flow velocities at the river bank increase after vegetation and tree removal, won't that worsen the erosion conditions for the river banks, including any habitat or soil above the riprap?

Please explain the logic that your plan calls for development of planting benches that fall in to launchable rock toes, yet you are removing trees and vegetation and then having to replant them in sandy soil, how will this impact heat island effect and habitat interim and long term stability?

RECREATION CONCERNS:

The American River Parkway is a highly visited "Wild and Scenic Area"attracting more visitors than Yosemite National Park annually. Thousands of birdwatcher and other nature lovers from around the world come to visit.

How will the sharp rocky installations impact recreational activities and access such as kayaking, fishing, wading?

How many linear feet of shoreline will be removed from public access after you install the launchable rock toes, planting benches, and bank armoring with very sharp rocks of unknown source in area 3B?

Will there be more toxic serpentine laden rocks for this infill?

How will this, along with loss of shade, usual habitat and general disruption, impact the beleaguered Salmon life cycle and waterfowl and other wildlife?

Research has linked exposure to trees to both physical and mental restoration. For example, a number of studies have found that exposure to urban forests generally reduces mental and physical stress, anxiety, and depression, and that they improve moods.

How will removal of 500 heritage oak trees impact wildlife as well as the mental health of human visitors? Trees provide several benefits that relate to well-being. Research has also found that tree canopy cover significantly contributes to neighborhood social connection and social support, both important to mental well-being.

The study authors, Thomas Astell-Burt, Ph.D. and Xiaoqi Feng, Ph.D. with the University of Wollongong, in New South Wales, Australia,

EPA/CLIMATE/EQUITY QUESTIONs:

https://www.epa.gov/heatislands/heat-island-compendium

Evidence from other similarly mitigated habitats shows that a half century later, there remains substantial habitat loss. How will we be reaching the EPA goal of reducing heat islands by cutting trees and clearing vegetation with anticipated several years delay before partial restoration might possibly be achieved?

What protection or mitigation can be provided to the Tile 1 Elementary School locate in the epicenter of this intended work? How will school children be able to concentrate with substantial noise pollution? Will you be providing Ear protection to mitigate the hearing loss and headaches? Will you be providing Hepa Filters and other anti-pollution devices or measures to protect them in their classrooms?

We know from 2017 SMUD report Page 28 specifies the amount of carbon storage in Sac County that forests provide - there is an associated map that identifies the forested area as basically the Blue Oak Woodlands in the Southeast County. There is another section starting on page 41 - Urban Forestry that details additional carbon capturing benefits within the urban areas.

Page 28,
3.1 CURRENT INVENTORY AND FORECAST SCENARIOS

The results of the carbon inventory reflect that there is a substantial quantity of carbon sequestered by lands in Sacramento County. Based on LANDFIRE 2014, Sacramento County lands held roughly 36.3 million MTCO2e in aboveground biomass, belowground biomass, and soils. General agriculture, shrublands and urban areas make up a majority (approximately 80 percent) of landscape carbon in the 2014 inventory (Figure 14). Forests and grasslands consist of about 16 percent of the landscape carbon in the county with the rest of the LULCs accounting for approximately 3 to 4 percent of the inventory. These results are intuitive given that urban, agriculture and shrubland areas dominate the acreage of the county. Furthermore, although forests only make up approximately 3 percent (Figure 15) of county acreage, their high biomass and soil carbon sequestration rates cause them to account for 8 percent of the 2014 inventory (Figure 14).

It is a move backward to deforest when history has demonstrated deforested regions were MOST susceptible to flooding, and we know forested regions have lower temperature, better air cleaning capacity and water saturation recovery and are more beautiful and offer needed shade for the wildlife on land and in the waters.

Lower risk particulate matter by river, higher by Watt and Rt 50

100 yr flood risk minimal along our portion of levee[1]

Note baseline Air toxics risk 95-100% along rt 50, watt corridor, 80th % along South side river, 70th along North Side in areas of planned interventions.

How much will this further exceed EPA standards with as yet not clearly designated staging, heavy equipment maneuvering and staging, potential compromise of Levees with situation of said equipment and accompanying noise, vibration, heavy exhaust compromising residents and habitat along the 3B corridor.

There appears to be a baseline protective effect of the river parkway heavily forested habitat, with natural mitigation of effects of high volume traffic areas high toxics cancer risk along Rt 50 Corridor and Watt Avenue which are at the 95-100% percentile on the EJ Screening tool, but reduced to the 80th percentile closer to the river, what is the predicted impact of this project on heat, air quality, fine particulates, increased cancer risk and risk of aggravation of respiratory disorders.

My daughter lives with lung cancer, the last thing we need is for her to be exposed to increased fine particulates and fugitive dust. What will you do to protect her health and the health of other vulnerable members of our community not only from the intended demolition, but which shall be forever impacted for our lifetimes once the trees are gone?.

The anticipated devastation that contract 3B North and South of the American River Watershed Common Features Project proposes for over a mile of the Riparian Habitat will be a costly loss to the regional ecosystem. Since California became a state in 1850, riparian forest in the Sacramento Valley has declined more than 98% from 800,000 acres to less than 14,000 (Stephen Johnson, Gerald Haslam, and Robert Dawson, *The Great Central Valley: California's Heartland*, p. 96). This rare treasure including trees protected by local ordinances, within urban Sacramento County must be preserved and protected, not decimated due to lack of careful consideration of risks vs benefits.
In same way we now know physiatrists obtain far better outcomes in function, symptom management and return to productive lifestyle for people with spinal conditions than any other specialty, including spine surgeons, we must take into consideration the power of working With the River and it's natural resources, not AGAINST it.

Thus I urge the Army Corps to reconsider and cease and desist the pending work in areas 3B North and South of the American River.

Respectfully submitted,

Lisa Merritt MD
Executive Director, MHI

My opinion is EPA is not up to date on the latest and greatest analyses USBR/NOAA/DWR/USACE have done considering various duration 100/200/1000-yr events and how Folsom would be able to dampen them, so I'd say to not bring this one up.

Sarasota Community Action COVID Dashboard: https://resiliencesystem.org/dashboards/sarasota-county/

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From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Friday, February 23, 2024 2:45 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: USACE Contract 3B Public Comment

From: Elizabeth Ganz <eganz482@gmail.com>
Sent: Friday, February 23, 2024 2:43 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: USACE Contract 3B Public Comment

You don't often get email from eganz482@gmail.com. Learn why this is important

1 I am the grandmother of an 8 year old little boy who lives next to Larchmont Park and O.W. Erlewine Elementary School. The current project proposal predicts significant and harmful impact to the air quality to the area including the school. I am very concerned for how the dust and fumes will impact health as well as the other children in the community. Please consider a less destructive and more targeted approach to strengthening the levees. Please implement mitigation measures such as moving construction away from O.W. Erlewine Elementary School and Larchmont Park.

Elizabeth Ganz