

Appendices Part 3

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United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
2800 Cottage Way, Room E-1712
Sacramento, CA 95825

February 23, 2024

IN REPLY REFER TO:
ER 24/0005

Guy Romine
U.S. Army Corps of Engineers,
Sacramento District
1325 J Street
Sacramento, CA 95814-2922

Subject: U.S. Department of the Interior Comments – *Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California, Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV.*

Dear Guy Romine:

intro

The U.S. Department of the Interior (Department) has reviewed the *Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California, Supplemental Environmental Impact Statement/ Subsequent Environmental Impact Report XIV* (DSEIS/SEIR) dated, December 2023 including *Appendix E: Environmental ARCF Erosion Protection Contract 3B Engineering and Design Phase* (Appendix E) prepared by the U.S. Army Corps of Engineers (USACE). The Department offers comments below on the DSEIS/SEIR and Appendix E, which include contributions from the Department's National Park Service (NPS) and Bureau of Land Management (BLM).

National Park Service Comments

1

The NPS provides comments and recommendations for the USACE to address potential impacts to the Pony Express National Historic Trail (NHT) and for the protection and enhancement of Wild and Scenic River (WSR) values including free-flow conditions, water quality, anadromous fish, and recreation. The NPS recommends that the USACE carefully evaluate alternative modeling, design approaches, and actions identified by the NPS, Sacramento County Regional Parks (Regional Parks), US Fish and Wildlife Service (FWS), National Marine Fisheries Service (NMFS), and other stakeholders to avoid and minimize effects on the WSR values. Addressing these issues will inform the NPS when preparing the Wild and Scenic Rivers Act (WSRA), Section 7 consistency determination for the American River Common Feature (ARCF) project (Project).

2 The Lower American River (LAR) is a component of the National WSR System. As the federal administering agency for the WSR, the NPS makes assessments and consistency determinations under Section 7 of the WSRA for projects that would have the potential to have direct and adverse effects on the WSR values. The NPS considers the location of the Project and the potential for direct and adverse effects on free-flow, water quality, and the outstandingly remarkable values (ORV). The LAR ORVs are the river's anadromous fishery and recreational opportunities. Our analysis is based on the conditions present at the time of designation in 1981, including the levees.

The NPS has actively engaged in the ARCF project since 2020. We have routinely participated in meetings and are active in the USACE WSR Consistency Group meetings. We also regularly consult with the NMFS and Regional Parks regarding the ARCF's impacts on the anadromous fishery and recreation, respectively.

Pony Express National Historic Trail

3 The Pony Express National Historic Trail (NHT) intersects the area of potential effect (APE) of the proposal to address the levee upgrades in the vicinity of the City of Sacramento, addressed by previous project titled *American River Watershed Common Features Water Resources Development Act of 2016, American River Contract 2*. It is also intersected by the APE of the design changes proposed for the current DSEIS/SEIR, specifically in the vicinity of the Lower American River Design Refinements. Geospatial data for the Pony Express NHT can be found at <https://irma.nps.gov/DataStore/Reference/Profile/2238912>.

The Pony Express NHT is congressionally designated and is administered by the NPS, National Trails Office. We recommend that the DSEIS/SEIR include an analysis of impacts to the NHT from the current proposed design changes in the LAR, specifically as it pertains to setting and visitor experience on the Trail. Subsurface deposits related to the Pony Express NHT are unlikely but may occur in this area, especially between RM 7 and 12.5. Please notify Jordan Jarrett (jordan_jarrett@nps.gov) if any cultural deposits are encountered during levee upgrades which are related to historic use of the Trail. Jordan can also provide additional information about the Pony Express NHT and the National Trails Program, upon request.

General Assumptions and Review Approach

For this DSEIS/SEIR, the National Environmental Policy Act Proposed Action includes project components that are modifications or design refinements of the 2016 *ARCF General Reevaluation Report (GRR) Final EIS/EIR*, including Contracts 3B, 4A, 4B, and the ARMS which were not previously addressed in the Final EIS/EIR or subsequent supplementals. Our comments concentrate on the Proposed Alternative (Alternative 2) and its impact on the remaining projects/contracts that will provide the foundation for future Project-specific WSR Act consistency determinations.

Our review focused on:

- Assessing Table ES-1. Summary of Effects and Mitigation Measures for the Proposed Action.
- Examining the corresponding effects and mitigation measures in Chapter 3, Descriptions of Alternative 2, Proposed Action for American River Erosion Contracts 3B North, 3B South, 4A, 4B, and the ARMS.
- Examining Appendix E, Section E-4, Incorporation of Environmental Compliance Measures into Project Design as pertains to Contract 3B.

Environmental resource areas of interest are Water Quality, Aquatic Resources and Fisheries, Recreation, Aesthetics and Visual Resources, and Vegetation.

Best Management Practices

The NPS previously provided best management practices (BMPs) relative to alternative, bioengineered approaches to bank protection and site restoration. We recommend that USACE incorporate these BMPs into the LAR project designs, construction practices, and monitoring efforts to the extent possible. The best management practices are referenced in Appendix E.¹

Monitoring

The NPS recommends that the Proposed Action in the Final SEIS/SEIR include contingency plans for long-term maintenance of the launchable rock trenches and planting benches to address restoration of the sites should the launchable rock be mobilized. In the NPS's WSRA Consistency Determination for ARCF Contracts 1, 2, and 3A, we included a condition that USACE should have contingency plans for long-term maintenance of the launchable rock trenches and planting benches and provisions to address restoration of the site should the launchable rock be mobilized.² This would extend to a future time when the Sacramento Area Flood Control Agency (SAFCA) will be ultimately responsible for managing the levees.

Hydraulic Modeling

The NPS recommends that USACE review and consider advancements in flow modeling to inform design solutions. Recently, BLM shared new peer-reviewed science with advanced flow modeling for the peak flood flow rates (including use of the American River as a case study) that has shed light on the critical importance of tree vegetation in moderating river velocity near the levee and riverbanks. Examples of these studies are provided in Enclosure 1. Without utilizing this advanced modeling that incorporates vegetation, the USACE models may be overestimating the erosion risk of the densely vegetated banks. The NPS recommends that the USACE utilize the new science and updated modeling tools to reevaluate the river velocities near the levees to

¹ U.S. Army Corps of Engineers. *DRAFT Appendix E: Environmental. American River Common Features Erosion Protection. Contract 3B. Engineering and Design Phase*, (2023), E-39-E-42.

² NPS consistency determination for Contracts 1 and 2 (July 2021) and Contract 3A (November 2022).

determine the extent of needed tree removal and ensure the new designs will not worsen erosive conditions for the levees.

Water Quality

7 The NPS requests that USACE implement the Reasonable and Prudent Measures, Mitigation Measures, and Recommendations included in the NMFS 2015 and 2021 Biological Opinions (BOs) to avoid and reduce water quality impacts. The NPS considers effects on water quality in our WSRA consistency determinations. The DSEIS/SEIR Section 4.4.4 states that water quality impacts would primarily arise during construction. We are concerned with construction impacts on Essential Fish Habitat and Shaded Riverine Aquatic habitat, including impacts on water temperature and associated effects on anadromous fish.

Anadromous Fishery

8 We recommend that the USACE review and incorporate lessons learned from previous projects to improve the approach to Instream Woody Material (IWM) placement and on-site restoration in all projects along the LAR. On-going monitoring and adaptive management to address any issues should also be part of all upcoming projects. In the Final EIS/EIR, please include information on how the USACE and SAFCA are improving the success of these sites and adaptively managing them to ensure successful restoration of the area.

9 During recent field visits to upstream sections of Contract 3B South, the NPS contractor has observed that the placement and anchoring of IWM in previous erosion protection efforts could have been more effective. Much of the remnant IWM at this site was above the Ordinary High Water Mark (OHWM) and would not provide refuge. We understand this problem exists at other former USACE sites on the LAR. Therefore, we recommend that USACE and SAFCA investigate these sites to inform design, construction, monitoring, and adaptive management methods for all the LAR projects outlined in the DSEIS/SEIR.

10 Similar to water quality, the NPS requests that USACE adhere to the Reasonable and Prudent Measures and specific mitigation measures prescribed in the NMFS BO (2015, revised 2021) and the mitigation measures contained in the DSEIS/SEIR to protect the anadromous fishery ORV for the LAR. The NPS will monitor the NMFS's compliance assessment with the BO and any potential changes with the re-initiation of consultation on this Project. The NPS maintains that compliance with the NMFS BO is an essential criterion for our determination of WSR Act consistency. The NPS appreciates that USACE acknowledged this in the DSEIS/SEIR.

American River Parkway Plan

11 The NPS appreciates the DSEIS/SEIR's acknowledgment of the American River Parkway Plan (Parkway Plan) as the management plan for the WSR.³ The NPS maintains that consistency with

³ DEIS/SEIR Section 6.2.18: "In 2008, the County of Sacramento finalized the American River Parkway Plan to provide a guide to land use decisions affecting the Parkway and specifically addressing the Parkway's preservation, use, development, and administration. The Parkway Plan acts as the management plan for the Federal and State Wild and Scenic Rivers Acts".

the Parkway Plan developed by Regional Parks is an important factor for the NPS's determination of WSRA consistency. The NPS collaborates routinely with Regional Parks staff and adopts their conditions and recommendations relative to compliance with the Parkway Plan as a condition for a positive WSRA consistency determination.

Recreation

- 12 The NPS recommends that USACE continue to work with Regional Parks, the community, and NPS to seek ways to reduce temporary and permanent effects on recreation and ensure public awareness of temporary changes in the Parkway. We are pleased that the USACE design team has made considerable efforts to sequence the construction of C3B North to minimize closures and disruptions to equestrian, pedestrian, and bike trails within the Parkway. Efforts have been made to utilize existing trail alignments to the extent possible. This has also been the case in Contract 4A. As applicable, these efforts should be employed in future contracts (4B and ARMS).
- 13 The NPS recommends that USACE include temporary and permanent safe informal river access for paddlers, swimmers, and other water play activities to address Project impacts. The NPS recommends that the USACE seek ways to reduce tree removal and minimize the visual impacts during design refinements and construction. Although scenic values (aesthetics) are not recognized as an ORV for the LAR, we consider it a value associated with the recreational ORV.
- 14 Scenic values are an essential component of the recreational experience within the Parkway. This includes the quality of the viewshed from the river's vantage and the dominant presence of large trees and native vegetation in the current Parkway corridor. This supports our concern with the removal of large trees and riparian vegetation dictated by the bank protection designs. We recognize that this is addressed in the DSEIS/SEIR visual mitigation measures and request that the USACE continue to seek ways to minimize the impacts during design refinements and construction.

Riparian Vegetation and Tree Removal

- 15 As stated above, the NPS recommends that USACE continue to seek ways to reduce the removal of riparian vegetation and mature trees. The NPS also recommends that the riparian vegetation be restored as quickly as feasible after project construction. We appreciate that the USACE design team has strived to mitigate the magnitude of tree removal and we maintain that the NPS, Regional Parks, and the community continue to be very concerned with this, particularly at the Contract 3B South site. We also note that, Section E.2.3.8.1, Reducing Habitat Impact in Appendix E, indicates that *"Saving these trees will likely assist meeting goals for the National Park Service Consistency Determination when it is coordinated in addition, saving these trees reduce the habitat impacts and mitigation needs."*
- 16 The NPS recommends that the USACE work with Regional Parks and resource agencies to modify the design to ensure the success of establishing planting benches. We agree with Regional Parks biologists who are concerned about the designs that include a layer of cobble over the soil instead of coir fabric material. This could limit the effectiveness of reestablishing vegetation on the planting benches.

American River Mitigation Site (ARMS)

- 17 The NPS requests that USACE modify the proposed design alternatives at the ARMS site to incorporate viable alternatives that retain a portion of the pond. The pond's existing wildlife and aquatic values must be factored into the effects analysis. The NPS shares concerns expressed by Regional Parks who have continually disagreed with the assertion that the retention of a pond on-site would be solely a "recreational feature."⁴ We recommend the USACE design team reconsider the design alternatives and comprehensively evaluate the recreation, wildlife, and aquatic values. The pond has been on the landscape for decades and has existing wildlife habitat values that must be acknowledged and evaluated in DSEIS/SEIR Section 4.5.1.2.2. The NPS requests that USACE conduct additional analysis on converting the existing 58-acre off-channel pond to freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats.
- 18 USACE also needs to evaluate, describe, and disclose the habitat conversion's permanent and temporary effects during construction and re-establishment of the habitat. Additional recommendations are listed below.
- 19
- The USACE should seek options for retaining mature trees and riparian vegetation in all alternatives, which will protect and enhance the recreation and aesthetic values.
- 20
- The No Action Alternative should be updated to reflect that the ARMS site is now in public ownership.⁵ The environmental baseline should be updated to reflect that SAFCA, a public agency, has purchased the Urrutia parcel, the site of the proposed ARMS.
- 21
- The NPS suggests that the USACE updates the SEIS/SEIR to add Regional Parks as an agency with authority over tree removal in the Parkway in Section 4.4.1.2.2.⁶

BLM Comments

summary BLM provides its comments on the DSEIS/SEIR which are based on the special expertise of hydrology within the BLM California State Office. BLM's comments generally focus on the following topic areas:

- NEPA Analysis
- Success of post-construction revegetation efforts
- Hydrodynamic modeling and use of best available science
- Adaptive management and Nature Based Solutions

⁴ DSEIS/SEIR Section 3.3.2.1.5: "Neither the ARCF 2016 Project nor the Planning Guidance Notebook (USACE Civil Works policy) provides authority for USACE to spend appropriations on recreation improvements or the long-term management of a non-life and safety feature; the pond would be considered a recreational feature since it does not meet species habitat mitigation criteria."

⁵ DSEIS/SEIR Section 4.5.1.2.1: "The No Action Alternative states that "ARMS will remain a man-made pond in private ownership."

⁶ DSEIS/SEIR Section 4.5.1.2.2: "The American River Parkway Plan states, in Policy 4.12, that ... 'The Sacramento County Tree Preservation Ordinance requires 'A Tree Pruning or Tree Removal Permit...to prune or remove any public tree and certain private trees.' Project Partners would include Sacramento County tree removal work to ensure compliance with county ordinance."

Please see Enclosure 2 for the full text of BLM comments. The Department recommends that you reach out to BLM or Stonybrook University, Department of Civil Engineering, who led the downstream modeling work, to have further discussions on these topics as they may provide valuable insight on advances in hydrodynamics.

Conclusion

For questions or additional information pertaining to NPS comments, please contact Susan Rosebrough, Wild and Scenic River Coordinator, NPS Interior Regions 8, 9, 10 & 12 at Susan_Rosebrough@nps.gov or Barbara Rice Program Manager, Rivers, Trails, and Conservation Assistance and Hydropower Programs, NPS Interior Regions 8, 9, 10 & 12 at Barbara_rice@nps.gov. For questions pertaining to BLM comments, please contact David O'Connor, California State Office Hydrologist at doconnor@blm.gov. For all other questions, or if I can help set up meetings with BLM, please contact me at Janet_Whitlock@doi.ios.gov.

Sincerely,

**JANET
WHITLOCK**
Digitally signed by
JANET WHITLOCK
Date: 2024.02.23
15:39:41 -08'00'
Janet Whitlock
Regional Environmental Officer

Electronic distribution: ARCF_SEIS@usace.army.mil

Enclosures

cc: Shawn Alam, Department of the Interior: Shawn_Alam@ios.doi.gov
David O'Connor, BLM Hydrologist: Doconnor@blm.gov
Barbara Rice, NPS Program Manager: Barbara_rice@nps.gov
Susan Rosebrough, NPS Wild and Scenic River Coordinator: Susan_Rosebrough@nps.gov
Roxanne Runkel, NPS Environmental Protection Specialist: Roxanne_Runkel@nps.gov
Harry Williamson, Jonas Consulting: hwillia44@gmail.com
Danette Woo, NPS Regional Environmental Coordinator: Danette_Woo@nps.gov

ENCLOSURE 1

Articles on Advanced Modeling Tools Incorporating Vegetation

The following studies and peer reviewed papers illustrate advanced modeling tools that demonstrate the importance of incorporating the effects of vegetation into hydraulic models to understand its effects on river velocities and flow dynamics during flood flows.

Flora, K., Santoni, C., & Khosronejad, A. (2021). Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River under Flood Conditions. ASCE. Journal of Hydraulic Engineering.

Flora, K. & Khosronejad, A. (2021) On the Impact of Bed-Bathymetry Resolution and Bank Vegetation on the Flood Flow Field of the American River, California: Insights Gained Using Data-Driven Large-Eddy Simulation. ASCE Library. Journal of Irrigation and Drainage Engineering Volume 147, Issue 9.

Flora, K. & Khosronejad, A. (2023). Uncertainty Quantification of Bank Vegetation Impacts on the Flood Flow Field in the American River, California Using Large Eddy Simulations. ESPL Wiley.

Liu, D., Valyyrakis, M., & Williams, R. (2017). Flow Hydrodynamics across Open Channel Flows with Riparian Zones: Implications for Riverbank Stability. Water MDPI.

ENCLOSURE 2

BLM - California review of Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California, Supplemental Environmental Impact Report XIV.

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Review Background

In this paper, a Bureau of Land Management (BLM) hydrologist with special expertise reviews a project led by the United States Army Corps of Engineers (USACE), the American River Common Features (ARCF) project in the Sacramento Area, CA. It examines the *Draft American River Common Features, 2016 Flood Risk Management, Sacramento, California, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV* (DSEIS/SEIR), dated December, 2023 and other supporting reports.

The DSEIS/SEIR joins the *2016 ARCF General Reevaluation Report (ARCF GRR)*, and it's Final *Environmental Impact Statement /Environmental Impact Report (FEIS/FEIR)* for a now authorized USACE project. It advocates “*new and emerging design refinements*” and provides an assessment of environmental effects. USACE is the Lead National Environmental Policy Act (NEPA) Agency. The State of California’s Central Valley Flood Protection Board is the Lead California Environmental Quality Act (CEQA) Agency. Sacramento Area Flood Control Agency (SAFCA) is a cooperating local, Responsible agency. No other local, state, or federal agencies are identified as partner agencies.

In order to minimize levee and riverbank erosion, the ARCF project proposes, generally

1. riparian forest removal
2. emplacement of static and launchable riprap-based Erosion Control Features (“bank protection” or “revetment” - riprap with soil placed above)
3. revegetation

Previously authorized work in the FEIS/FEIR includes forest removal and similar Erosion Control Features, for example, installing “launchable trenches” followed by revegetation. Refinements in the DSEIS/SEIR add work area locations and additional riprap based features such as “launchable toe” and “tieback” riprap-based features. Toe refers to the toe of the riverbank near the bottom of the river channel and tiebacks refer to riprap-based features placed perpendicular to the river.

Project Background

Sacramento is rightfully famous for its flood risk potential. ARCF is a flood control channel improvement project for Greater Sacramento that dates to 1996 and has been funded and modified through a number of Congressional Acts, such as Water Resources Development Act (WRDA) of 1996, WRDA of 1999, Water Resources Reform and Redevelopment Act of 2014, and the Bipartisan Budget Act of 2018. It is one of several major flood risk management projects for Greater Sacramento that directly or indirectly came out of the historic storm series of 1986 or 1997. These include the Joint Federal Project (the auxiliary Folsom Dam spillway), the Folsom Dam Raise (ongoing), the update to the Folsom Dam Water Control Manual (Folsom WCM) and West Sacramento projects. One initial outcome from those historic atmospheric river events was a mandated temporary increase in flood control volume reserved for upstream Folsom Lake reservoir. This mandate was in effect until the auxiliary Folsom Dam spillway became operational and part of the Folsom WCM approximately five years ago (2018), as authorized in WRDA 1999.

In 1996, Congress funded USACE via WRDA of 1996 to fix levee seepage issues on the Lower American River (LAR). Shortly thereafter USACE created the ARCF. The 1997 “New Year’s storm” caused LAR seepage concerns outside of the scope of the 1996 authorization, as well as additional levee overtopping & erosion concerns. Further Acts funded USACE projects to fix a range of LAR seepage and overtopping issues. As upstream and downstream projects became more connected in design goals and criteria, common limits and guiding principles were shared across projects. One notable example is the maximum objective flow rate upper limits for control of 100-yr and 200-yr type events: 115,000 cubic feet per second (115 kcfs) and 160 kcfs, respectively.

ARCF’s locations consist of the north and south banks of the American River downstream of Folsom Dam encompassing the LAR, the Natomas Basin, the east bank of the Sacramento River, and other small waterways. ARCF manages infrastructure improvements to address channel and levee issues, as well as other infrastructure improvements such as weir and bypass modifications on the Sacramento River flood control system.

Below Nimbus Dam, the LAR has both State-of-California designation (since 1972) and federal designation (since 1981) as a Wild & Scenic River (WSR) over the rest of its downstream length (~23 miles).

This area is located completely within the American River Parkway, a protected greenbelt that sees more than 5 million recreational visits per year and provides aquatic and terrestrial habitat to threatened and endangered species and important fish species such as chinook Salmon (*Oncorhynchus tshawytscha*).

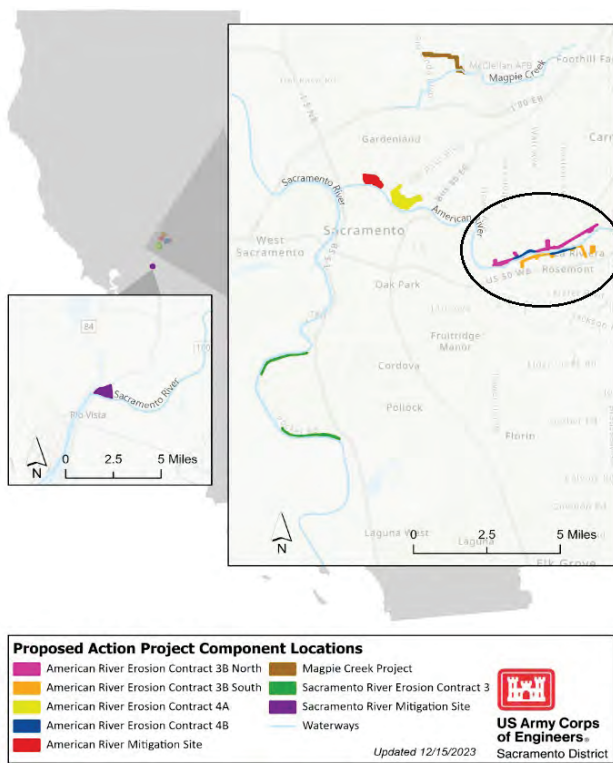


Figure 1: Geographic extent of BLM review shown in ellipse

The proposed actions of the DSEIS/SEIR apply to eight separate projects specific to locations on either the approximate lower half of the LAR (up to River Mile ~12), portions of the Sacramento River, or other small waterways. Due to time constraints, this review focuses only on the area circled by the ellipse on Figure 1 and represents the main concentration of the next phase of ARCF work on the LAR (the Project, roughly from Howe Ave Bridge to Mayhew Drain). In contrast to previous SEIS/SEIR for other recent ARCF subprojects focusing on single or small number of project footprints, this DSEIS/SEIR broke from precedent and used a Programmatic NEPA approach, lumping many projects across various areas into one DSEIS/SEIR.

For the LAR section of the river highlighted on Figure 1, from approximately River Mile 7 to 12, USACE’s flood control centric Purpose

and Need centers solely on *erosion control*, because overtopping and seepage concerns have been assessed to have already been fixed. This includes levee raising in select areas and emplacement of below-levee slurry wall along major sections of federal project levee mileage along the LAR.

The ARCF GRR provided a funding summary of previous total federal and non-federal spending on ARCF from 1996 to 2015: ~\$71million (m) for non-federal funding, and ~\$442 m in federal funding (~\$0.5billion (b) total '96-'15). The 2016 FEIS/FEIR, which doesn't include new work proposed by this 2024 DSEIS/SEIR listed a funding estimate for total project expense for 2018-2027: \$1.85b

In 2018 through the Bipartisan Budget Act, USACE received nearly \$1.8b to upgrade Sacramento's flood risk management system and fund ARCF, but the portion dedicated to ARCF projects was not identified, nor were any post-2018 funding amounts identified.

Project Setting

The LAR system provides water supply for urban and agricultural uses, flood control, fish and wildlife protection, recreational opportunities, hydroelectric power generation, and it helps

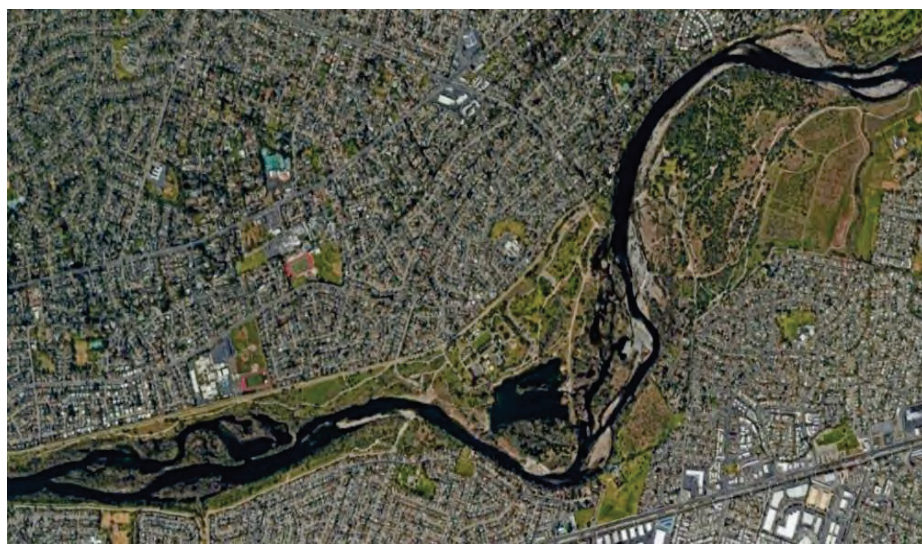


Figure 2 – Representative meanders, braids, and riparian forest of the LAR

protect water quality conditions in the Sacramento-San Joaquin estuary (“The Delta”). The LAR represents a complex, braided riverine environment that traverses poorly understood, complex geology.

Starting early last century, the LAR was disconnected from its floodplain via large, engineered levees over

the majority of its length in Greater Sacramento. The LAR is in sediment-deficit due to the upstream dam installation of Folsom Dam in 1955. In general, the upper half of the LAR is richer with coarse, river rock sediment bed cover and the lower part less so. Like most fluvial deposits, geologic formations comprising bank material range widely, from channel fill, flood plain, natural levee, and crevasse splay deposits. Major units range from fine to coarse, variably consolidated, younger fluvial and alluvial fan deposits to older, more erosive-resistant, and more indurated marine deposits from the Plio-Pleistocene epochs and older. Due to the history of Placer gold mining in the LAR, excavations and mining-processing deposits occur in the area and in places represent flood control concerns due to previous disturbances of land and concentrations of easily erodible, fine-grained mine process material.

22

The Department of the Interior and BLM-California have standards for riparian ecosystems, and in evaluating the proposed action we considered these standards as they are broadly applicable to riparian ecosystems. In many aspects, the river meets Proper Functioning Condition (PFC) criteria under these standards, as the channel is generally sandwiched by mature riparian forest and serves as very productive habitat for terrestrial and aquatic ecosystems. Some trees in the project footprint known as “Heritage Oaks” are older than the nation and have experienced numerous LAR flows well in excess of 160 kcfs. Per BLM, a riparian area is considered to be in PFC, or “functioning properly,” when adequate vegetation, landform, or woody material is present to:

- Dissipate stream-energy associated with high waterflow, thereby reducing erosion and improving water quality
- Capture sediment and aid floodplain development
- Improve floodwater retention and groundwater recharge
- Develop root masses that stabilize stream banks against erosion
- Maintain channel characteristics (US Dept of the Interior 2015).

23

The primary goal and objective of BLM-California’s Aquatic Resources Strategy is to “Conserve, Restore, and Connect Riparian and Aquatic Resources” and to “Conserve Remaining High-Quality Lands and Waters”:

Goal 1: Conserve, Restore, and Connect Riparian and Aquatic Resources

As one of the largest landowners in California, the BLM has a critical role to play in ensuring the health and sustainability of riparian and aquatic resources and ecosystem resistance and resilience to combat climate change. The BLM must focus on policies and management efforts that conserve remaining high-quality lands and waters, restore degraded riparian and aquatic resources, and ensure the connectivity of these systems. Conservation of good habitat and restoration of degraded aquatic and riparian resources are important activities to achieving this goal.

Objective 1.1: Conserve Remaining High-Quality Lands and Waters

Actions:

- a. Remove, minimize, or mitigate current threats and stressors to remaining high-quality riparian habitats, fisheries and amphibian habitats, and water resources.

(BLM-California, Dec 2023). BLM considers it essential that alternatives be explored rigorously before riparian forest removal is proposed.

In excess of PFC criteria and agency assessments, the riverine environment is high quality enough to be under protection from both California and federal law as a “Wild and Scenic River” (WSR). The “Outstandingly Remarkable Values” (ORVs) assigned to the river for the federal classification are both “Recreation” and “Fish”. The Sierra Nevada sourced water of the American River is well known as being high quality. To be assessed as “Outstandingly Remarkable”, a river-related value must be a unique, rare, or exemplary feature that is significant at a comparative regional or national scale. Section 10(a) of the Wild & Scenic Rivers Act directs that: *“Each component of the national 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 without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values”. In its technical report on managing wild and scenic rivers, the Interagency Wild & Scenic Rivers Council interprets Section 10(a) as: “Protect rivers by documenting and eliminating adverse impacts on values (free-flow, water quality, ORVs), including activities that were occurring on the date of designation. Enhance rivers by seeking opportunities to improve conditions” (*Wild and Scenic River Management Responsibilities* (2002)).

In many ways, reservoir operational decisions and policies for the LAR are prioritized for protecting fishery resources. For example, the Bureau of Reclamation (USBR), the upstream Dam operator, commonly makes release decisions that exceed minimum flow requirements to meet downstream daily water temperature compliance requirements set for Salmon egg survival goals, or to meet regulatory driven ecological flows that can vary by water year type, previous water year type, and storm event. USBR annually adds large volumes of river rock into the channel in at least two upper LAR sections to improve Salmon survival rates by attempting to improve rearing or spawning. The dire state of the salmon resource in the Lower American River and generally overall in California is well known and is associated with significant economic impacts.



Figure 3 - Healthy riparian forest of LAR and high-quality ecosystem habitat

Outside of DOI and USBR, many other local, state, and federal agencies spend large amounts of time and funding on maintaining the qualities of the LAR and the American River Parkway essential to sustaining habitats and recreation activities. The United States Fish & Wildlife Service (USFWS), the National Oceanic and Atmospheric Administration- National Marine Fisheries (NOAA-NMFS), and the California Dept of Fish & Wildlife (CFDW), regularly

conduct studies and regulate various LAR activities for the protection of river health or the conservation of numerous endangered or threatened species in the LAR. California State Parks works to make sure that activities such as kayaking, hiking, bird watching, fishing and other recreational activities can occur in the LAR as was intended in the original State-of-California WSR classification. Various agencies, at federal, state, and local levels perform levee maintenance and inspection activities.



Figure 4 - Healthy riparian forest of LAR and a LAR recreationalist

General Comments

24 The ARCF project does not appear to have had the benefit of sufficient investigation to diagnose the problem or to explore reasonably possible Alternatives. Given the likely large and numerous significant and long-term impacts from the proposed solution, it is my professional opinion that USACE should employ more modern diagnostic methods and tools for many aspects of the project. The report is vague and should provide more detailed information for this project.



Figure 5 - Looking upstream from Guy West Bridge, 8/26/2023, installation of riprap/revetment



Figure 6 - Looking upstream from Guy West Bridge, 11/5/2023, revegetation phase on buried riprap



Figure 7 – One of next ARCF Project Areas, looking upstream from Watt Bridge (9/29/2023) toward Mayhew Drain. Riparian forest removal is planned for both banks (north/left and south/right), but the majority of work is on the south bank. (See Appendix A for more detail)

1) Analysis should be commensurate with resource loss

25

The project is proposed in a complex riverine environment and takes a uniform approach to mitigating erosion across many different types of river stretches. It should include robust exploration of NEPA Alternatives and Effects at individual locations. Given the expansive loss of resources detailed over approximately one third of the LAR's twenty-six WSR miles in the FEIR/FEIS, there was neither sufficient description for the Purpose and Need, or for the Project design choice in the 2016 FEIS/FEIR or DSEIS/SEIR. Removing on the order of possibly 600 or more trees within the Project area for one subcontract (an independent estimate identified for Contract 3B of the DSEIS/SEIR), and many more for the whole ARCF project, clear cutting riparian forest and scraping brush clear, replacing a large number of coveted beaches, trails, and natural spaces and riverbanks with jagged rocks that block river access, requires diligent and top-level NEPA analysis. The report seems to lack sufficient justification for the extreme intervention as well as a demonstration that other methods were not feasible.



Figure 8 - Project Area ("Site 4-1", LAR river mile 10.4, south bank, recent alluviums)



Figure 9 - Project Area "Site 4-1", LAR river mile 10.1 South Bank, lower erosion resistant unit of Fair Oaks Formation

26

With similar ARCF, "Common Features" work having occurred in previous timeframes downstream, few photographs and little discussion are provided showing maturing trees or regrowth of healthy riparian habitat (only one area was shown, in the 2016 FEIS/FEIR). Visible now on river sections where soil filled riprap was placed and covered, it's common for only the riprap to be present. Maps showing past applications of revetment were not shown nor were reasons given why certain erosion control features are proposed in certain locations (e.g., underlying soil type, water velocity zone, riverbank slope gradient, distance from levee prism, tree density, past problems, etc.). Many important details, such as maps of proposed tree removal areas, are missing. Schematic figures of previous work areas were identified showing a large amount of trees planned to be left in place, but recent work (shown in Figures 5 and 6) show that virtually all riverbank trees were removed.

27

The report and appendices comprise 1778 pages, but the large majority of content is not directly related to foundational project components, such as primary information for the Purpose and Need, Alternatives, or Effects. When conducting the review, an extensive amount of publicly available data was identified not to be part of the analysis. Further comments below provide more information.



Figure 10 - LAR riverbank, without ARCF project, River mile ~10.5 (Water Year 2024)



Figure 11 - LAR riverbank (Water Year 2024), With ARCF project, Sacramento State area, sediment mobilization (River Mile ~6)



Figure 92 - LAR riverbank post ARCF project, with soil eroded away from riprap (RM ~10.3) (WY 2024)

2) The fix relies entirely on revegetation success

28

A major premise of the problem is that in the current, forested condition, river velocity will be too fast near the riverbanks at very large flood control releases, and in particular for a 200-yr storm event. If revegetation, the last step of the project, should stall or fail, river velocity at the riverbanks will be faster, or much worse than the without-project condition. Details of the tree clearing areas were not provided in the DSEIS/SEIR. If the same style of clear cutting and riprap emplacement follows the style of ARCF work just completed near Sacramento State University several miles downstream, saplings may very possibly fail to grow. Erosion conditions also may worsen in a long-term sense from the rupturing of riparian banks due to tree root extraction and heavy machinery disturbances, as has happened commonly in the historical record in general. Heavy machinery activity and repair work is expected periodically for the project as the launchable features, and their planting benches above, have a finite lifetime on the decades scale. Currently, the banks are armored with grasses, brush, woody debris, and trees.



Figure 10 - Site 4-1 Interior of channel, near baseflow (Jan '24). Healthy vegetation and woody debris

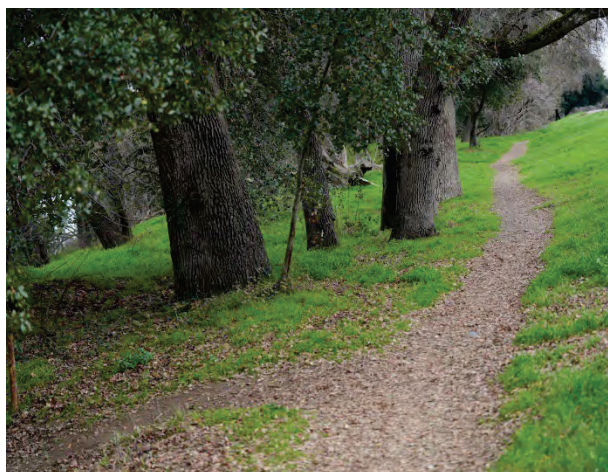


Figure 11 - Site 4-1 Levee embankment at edge of channel (Jan '24). Mature oaks

29

Challenges to saplings establishing include:

1. Insufficient root penetration through the soil filled riprap/revetment for in-channel purchase
2. Complete loss of shade canopy in a warming climate with extending droughts
3. Flashier hydrology than historical conditions due to climate change, and increased erosion due to channel clearing
4. Loss of surrounding ecosystem and biodiversity resources and services that process contaminants and metabolize nutrients
5. Unnatural flow regulation (upstream dam)
6. Launching of erosion control features. In places, “planting benches” may collapse due to launchable riprap features.

30

The following Figures show the state of reforestation for a similar ARCF project in 2001 (with new work visible in the background), recent erosion problems from non-flood control releases for freshly completed work downstream, and riverbank areas with both banks modified.



Figure 125 - Limited forest revegetation in the foreground (Water Year 2024)



Figure 16 - Recent with-Project erosion (Water Year 2024)



Figure 17 - Treeless Wild & Scenic River (Water Year 2024)

3) Purpose and Need is not fully developed

The 2016 FEIS/EIR on which this work is founded states: *“Levees along the American River require improvements to address erosion. The rationale used to determine where erosion protection was required involved consideration of several factors. The most important factors included: 1) the velocity computed by the hydraulic modeling (Ayres 2004) for a discharge of 160,000 cfs, 2) the erodibility of the material near the levee prism, and 3) the past performance of the levee segment with respect to erosion”*. We feel each of these three areas have potential problems:

a) **Old hydrodynamic model**

- i) Using a two-decade old hydrodynamic model (2004) as a primary basis for these actions on an always evolving river is quite concerning. The model is a poorly resolved two-dimensional (2D) model that uses depth-averaged velocity and is likely oversimplified for the questions being asked of it. Little to no information was provided regarding model development, refinement, or verification. The quality of the model output was not such that it was possible to zoom into the project area. Diligent searches failed to locate original model development documentation; one reference mentioned that “refinement is not such that it [the model] can be used to micro-analyze conditions around an individual site location” (Ayres 2004). Possibly most importantly, a robust uncertainty analysis – a key to effective environmental decision making – was absent for the flow model as was any specific uncertainty analysis for the 2004, 2D flow model. Since 2004, major advances in applied hydrodynamic modeling have occurred.

b) **Little soil or vegetation characteristics**

- i) Soil and vegetation characteristics are key factors of material erodibility. Neither soil nor vegetation distribution maps were provided in the DSEIS/SEIR. ARCF-commissioned geologic mapping from 2012 was identified (Fugro 2012), but no connection between geologic units and erosion control features was shown or discussed in the DSEIS/SEIR or its supporting reports. Only two geologic cross sections were identified in connection with DSEIS/SEIR after diligent searches of referenced reports – one on regional scale geology and one at the riverbank scale.

c) **Little evidence of erosion presented**

- i) Throughout multiple dedicated erosion inspection events identified in sub reports, many sites in the DSEIS/SEIR project footprint were identified as not needing additional work. Very few instances of identifiable erosion or scour were able to be located in any of the documentation provided for the approximately 3-mile section of river. Because there has not been a gauged flow in the channel at or near the 160 kcfs range, subjective opinions are needed to estimate erosion and scour potential. These may not agree with erosion conditions predicted by modern, detailed three dimensional (3D) hydrodynamic models which can

simulate significant backwater effects, large eddies, or other flow characteristics common with turbulent flow.

- d) The overall classification method of how different river mile sections were graded on an erosion risk scale over the project lifetime was not clear. The Document's referenced reports indicate that a Bank Protection Working Group was formed recently to establish criteria for ranking erosion risk and determining which areas need protection based on reviewing model velocities at a large range of flow magnitudes, soil types, and different types of observed erosion evidence. Neither the general history of problem approach nor the most recent classification method is summarized in a plain manner. Upstream from here, Folsom Dam makes releases every day based on a sophisticated algorithm including probabilistic hydrologic forecast data that is well documented. USACE should provide the framework more transparently for decisions determining which areas need protection.



Figure 13 - Project Area, looking downstream (River mile 10.5 to Watt Bridge) from unnamed beach at River Mile 9.1 (Winter 2024)

4) Best available science is not used

NEPA 87 FR 23453 specifies that the EIS process “helps guide sound decision making, including development, in line with the best available science and data” and previous NEPA rulemaking covers the same concept.

35 During the ARCF project, from approximately 2019-2023, CalTrans/Department of Transportation commissioned the fluid dynamics laboratory at Stony Brook University to measure in detail the topo-bathymetry and vegetative structures near the Route 160 bridge area that is within the ARCF project footprint. The measurements were for the purpose of providing detailed input files for performing three-dimensional (3D), high-fidelity computational fluid dynamic modeling of the river at large flood control releases for the purposes of assessing risk to the bridge structures and bridge piers, as well as for academic reasons. A pattern of the research series’ finding was an emphasis on the protective effect of bank vegetation, with trees explained as generally keeping the core of high velocity flow away from riverbanks. Stony Brook University led a series of peer reviewed journal articles regarding the flow modeling from the LAR, ARCF project area. Key excerpts challenging the Project’s purpose or approach are included in italics.

Flora, K. and Khosronejad, A., 2023. Uncertainty quantification of bank vegetation impacts on the flood flow field in the American River, California, using large-eddy simulations. *Earth Surface Process and Landforms*.

“The simulation demonstrated that the trees lining the riverbanks imparted substantial flow resistance and produced significant backwater in the river”.

36 Flora, K. and Khosronejad, A., 2022. Uncertainty quantification of large-eddy simulation results of riverine flows: A field and numerical study. *Environmental Fluid Mechanics*, 22(5), pp.1135-1159.

“This conclusion demonstrates the value of collecting field velocity data at locations in the river away from meander bends to obtain more predictable flow data...” the results of this study apply to the specific flow conditions and river reach on the Sacramento River, they illustrate the importance of quantifying the uncertainty in both the model parameters and the resulting hydrodynamics when conducting numerical modeling of natural river flows”. “Recently, more sophisticated, high-fidelity models using detached eddy simulation (DES) and large eddy simulation (LES) have provided the capability to capture even greater spatial and temporal details of the flow. For instance, LES models for full- scale rivers like the Mississippi River in Minnesota and the Feather River in California have recently been modeled using LES”.

It's the understanding of the reviewer that no hydrodynamic monitoring or physical measurements have been conducted for the Project area.

Flora, K. and Khosronejad, A., 2021. On the impact of bed-bathymetry resolution and bank vegetation on the flood flow field of the American River, California: Insights gained using data-driven large-eddy simulation. *Journal of Irrigation and Drainage Engineering*, 147(9), p.04021036.

"The results indicate that the inclusion of trees in the simulations can significantly alter the flow dynamics of the river by decreasing the flow momentum and bed shear stress along the banks, while increasing the momentum and stresses in the middle of the river. While trees appear to increase turbulent fluctuations near the bank, these fluctuations probably do not contribute to erosion processes."

Flora, K., Santoni, C. and Khosronejad, A., 2021. Numerical study on the effect of bank vegetation on the hydrodynamics of the American River under flood conditions. *Journal of Hydraulic Engineering*, 147(9), p.05021006.

"Although both the tree-resolving and vegetation model approaches [different computation approaches in handling tree vegetation] compared well with one another with respect to the flow field, they significantly altered the computed river flow dynamics and bed shear stress near the banks and the midwidth of the river compared with that of the no-tree case."

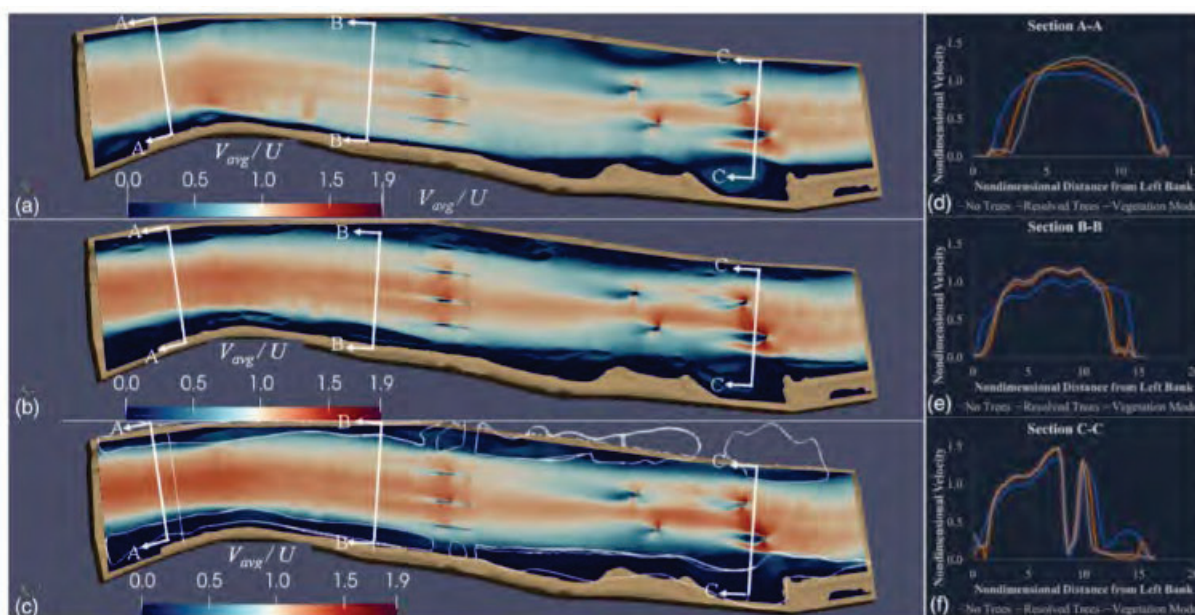


Fig. 9. Contours of time- and depth-averaged velocity magnitude (V_{avg}) normalized with mean-flow velocity ($U = 2.24$ m/s) for cases (a) without trees; (b) resolved trees; and (c) vegetation model with vegetated regions are outlined near the banks. The three lines across the river in each figure are cross-section locations indicating how the velocity magnitude compares for each case in which Sections A-A, B-B, and C-C are indicated in (d-f). Horizontal distance is normalized by mean-flow depth of ~ 12.2 m, and flow is conveyed from right to left.

Figure 14 - Flora & Khosonejad 2021. This image above includes three versions of velocity output from three modeled vegetation scenarios in the ARCF footprint. The top is a no-tree scenario, representing a scenario immediately after tree removal, continuing permanently if planned revegetation fails. Note how thin the buffer of slow velocity (dark blue) water is at the riverbank margins of the top, no-tree scenario, in contrast to the much thicker buffer of slow velocity water in the other two with-tree scenarios.

38 Other directly relevant papers were identified to be publicly available but not acknowledged in the DSEIS/SEIR:

Weber et al. 2018. 2006 – 2017 Topographic change and landform evolution of the lower American River. American Geophysical Union, Fall 2018 meeting poster.

This analysis uses a commonly accepted, modern method of spatiotemporally quantifying changes to riverbed surfaces, to identify locations of change and to quantify sediment gains and losses over various segments of river. The study concluded approximately 4 acre-feet of sediment (converted from metric) were lost on an annual basis from 2006 to 2017, for a river section that fully contained the Project (Riverbend Park to Watt Ave). It is not clear why this important conclusion did not appear in the Project's analysis.

Liu, D., Valyrakis, M. and Williams, R., 2017. Flow hydrodynamics across open channel flows with riparian zones: Implications for riverbank stability. *Water*, 9(9), p.720.

“For practical case studies, it is suggested to undertake a thorough hydrodynamic monitoring campaign at the [river] sections of interest (e.g., adjacent to critical infrastructure [or critical habitat])”.

It’s the understanding of the reviewer that no hydrodynamic monitoring or river velocity measurements have been conducted for the Project area.

Lower American River HEC-RAS 2D hydraulic model of the LAR. CBEC, Eco Engineering. <https://www.cbecoeng.com/our-projects/lower-american-river-current-condition-dem-2d-model-development-project/>

“CBEC is calibrating and validating two hydrodynamic models, an ecological flow model and a flood flow model. The ecological model will apply to flows ranging from 500 to 20,000 cfs. The flood model will apply to flows ranging from 20,000 to 160,000 cfs and will support geomorphic and flood impact analyses. In addition to client involvement, the flood model has been developed with input from MBK Engineers, Northwest Hydraulic Consultants, California Department of Water Resources, US Army Corps of Engineers, and the Lower American River Bank Protection Working Group”.

It’s unclear why the DSEIR/SEIS did not use or reference this newer hydraulic model that appears more modern and resolved than the 2004 version and to include post-Water Year 2017 data and conditions.

5) Not enough observed data

40

The 2004 model simulation output is relied on very heavily, and with the exception of the sparse erosion evidence presented, very little observed data appears to have helped refine the modeling or gone into the analysis of the FEIS/FEIR or DSEIS/SEIR.

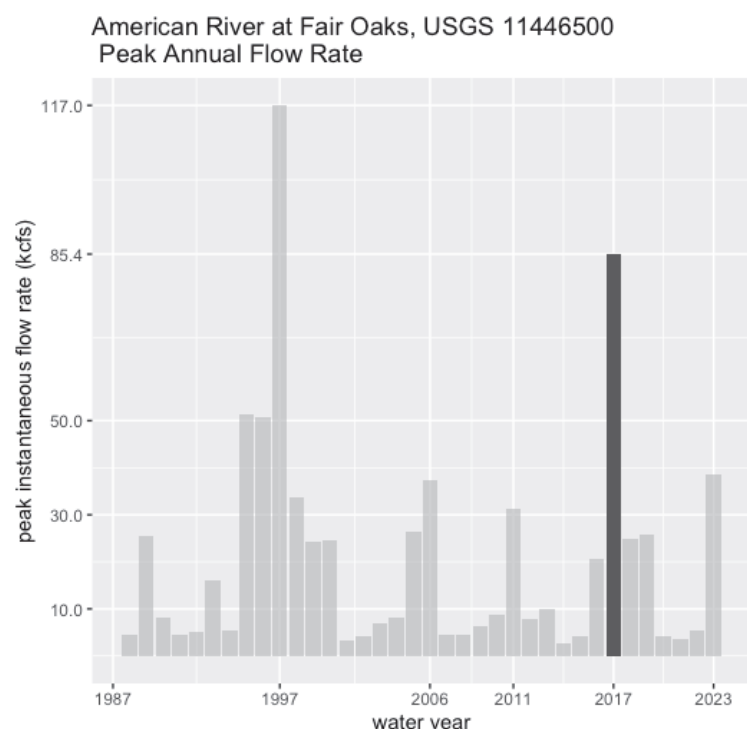


Figure 15 - Peak Water Year flow highlighting Water Year 2017 (Data retrieved from USGS via USGS DataRetrieval library Feb '24)

Since the historic flood control releases of 1986 (~134 kcfs), the third next highest instantaneous flow on the LAR has been ~85.4 kcfs, in water year 2017. The Figure below shows a summary of peak LAR discharge from the publicly available United States Geologic Survey (USGS) stream gauge at Fair Oaks, close below Nimbus Dam. It wasn't obvious why little to no discussion or data was included about this historic release or how it informed the project. Had assuring model verification results, or comparisons of model and observed flow data been provided, more confidence in the predictive ability of the model would be given.

41

It's unclear why a sequential LiDAR topo-bathymetric classification/differencing program

42

has not been established by USACE, given the relative affordability in measurement and the overall risk to Greater Sacramento from LAR flooding.

Another potential area for obtaining rich amounts of observed data is the availability of many types of geophysical logs of borings that form a basis for modern sequence stratigraphic correlation techniques (image example shown in Comment 7). With geophysical logs and principles of sequence stratigraphy, USACE would be able to construct a detailed, three-dimensional conceptualization of the Project area (more information and example images provided in comment 7), that would help overall inform site-specific susceptibilities to erosion, which can help determine the degree to which erosion control features are needed.

43

6) Consider Adaptive Management

44

Climate change is driving rapid ecological changes. Adaptive management is a resource management approach that acknowledges our limited understanding of how natural systems respond to human alterations by treating policies and management interventions in natural systems as experiments from which to learn. In a relatively new field such as river engineering and restoration, for which the Project has main project components, adaptive management is appealing, as it allows managers to learn while acting and promises to reduce uncertainty. BLM strongly encourages adaptive management approaches to its projects involving channel modification and stream restoration. Rather than using adaptive management approaches, ARCF appears to be adhering to original prescriptive design approaches that appear less modern and less able to accommodate unforeseen circumstances or new findings.



Figure 16 – Launchable toe, proposed for Project area, applied downstream of Project area

applies
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#45-49

7) Lack of detail

When reviewing the report, details of key project information and data that was not in the DSEIS/SEIR is freely available to the public. BLM recommends that USACE use this data in the analyses.

- 45 a. Detailed topographic-bathymetric data was not identified as used in the SEIR/SEIS. Multiple sources of detailed topo bathymetry data are available from USGS:
- 1) USGS (2021). USGS 3D Elevation Program 1-meter Digital Elevation Model.
 - 2) USGS 3DEP LiDAR point clouds. Dataset name: CA UpperSouthAmerican EIDorado 2019
 - 3) USGS 3DEP LiDAR point clouds. Dataset name: USGS LPC Ca NoCal Wildfires B5a 2018
- 46 b. Detailed tree data was not identified as used in the SEIR/SEIS. Multiple sources of detailed tree structure data are available from USGS. Tree classification methods are available as off the shelf tools in open-source or subscription-based Geographic Information System (GIS) software.
- 1) USGS 3DEP LiDAR point clouds. Dataset name: CA UpperSouthAmerican EIDorado 2019
 - 2) USGS 3DEP LiDAR point clouds. Dataset name: USGS LPC Ca NoCal Wildfires B5a 2018
- 47 c. No geologic information, a key to classifying erosion risk, was provided in the SEIR/SEIS except for reference to past studies.
- 48 d. All figures showing where erosion control features are planned are on the scale of an inch on the paper equating to some major portion of a mile, such as 1 inch = 0.5 mile. At this scale, a major portion of Sacramento is shown in the DSEIS/SEIR figures (e.g., ~12 square miles), instead of any detailed view of the riverbank work areas, which are high quality open spaces and habitat areas. The 2012 geologic mapping (Fugro 2012) was presented at a scale of 1 inch = 200 ft, but no geologic information was shown at any scale in the DSEIS/SEIR, with or without geographic information of where the erosion control features are planned. The zoomed-out nature of the figures made it impossible to understand exactly what features were planned where, providing little confidence that a sufficiently detailed erosion control feature suitability analysis was conducted.
- 49 e. It's the reviewer's understanding that only a regional, non-detailed, lithostratigraphic based three-dimensional geologic conceptualization of the subsurface exists for the ARCF project. In general, detailed cross sections of river-bank geology were not presented with the exception of one cross section across Watt Avenue (Fugro 2012) (top image next page).

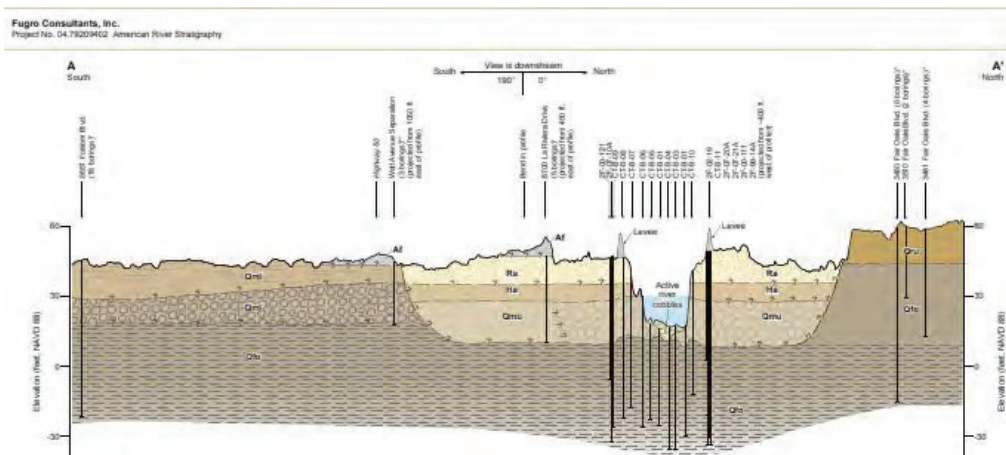


Figure 17 - ARCF lithostratigraphic riverbank cross section 1 (Watt Avenue)

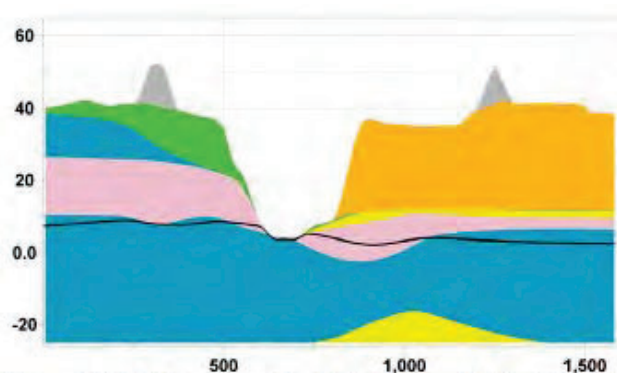


Figure 11-1: 3D Stratigraphic Model Section 11 Near RM 7.2

Figure 18 - ARCF river bank lithostratigraphic cross section 2 (near Howe Ave)

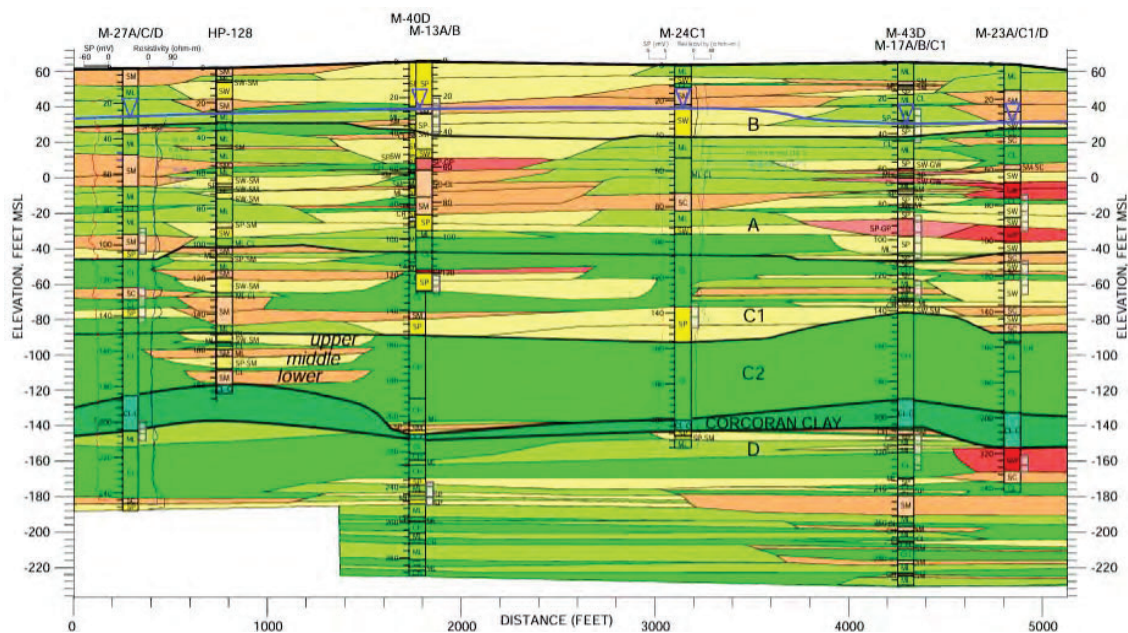


Figure 19 - Modern, detailed sequence-stratigraphy based cross section example of fluvial deposits showing cycles of incision and deposition, and alternating sequences of coarse channel material (red and orange) with fine grained low energy deposits (green and yellow), for a non-ARCF project

8) Consider nature-based solutions (NbS)

Different schools of thought exist regarding the extent to which nature-based solutions (NbS) can be effective in various flood control applications. On one hand, "the presence of riparian forest on riverbanks significantly reduces the likelihood of erosion by mass failure due to reinforcement of riverbank soils by tree roots and this reduced likelihood of mass failure enables a narrower channel cross-section than would otherwise be the case" (Hubble 2010). On the other, it can be accepted that in certain cases of high river velocity near riverbanks, that only rocks can withstand the erosive force of high velocity water.



Figure 20 - Project Area during a flood control release of Water Year 2023, showing slow moving/backwater conditions at the intersection of the river with healthy riparian vegetation

A common definition of NbS is "Solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more nature and natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions" (European Commission 2020).

In April 2022, the Biden Administration issued Executive Order 14027, Section 4 to "Deploy Nature-Based Solutions to Tackle Climate Change and Enhance Resilience and to ensure that agencies pursue nature-based solutions" (White House 2022). The Federal Emergency Management Agency (FEMA) prioritizes NbS in its project scoring criteria. USACE has recently published the award winning "International Guidelines on Natural and Nature Based Features for Flood Risk Management" (Bridges et al 2021), and two atlases of "Engineering with Nature Atlas" (Bridges et al 2018), containing hundreds of projects highlighting examples of agency collaboration and improvements made to the functioning condition of natural systems including riparian corridors.

Revegetation is part of the Project so nature is not ignored, but "Nature-based Solutions" was not identified in any ARCF report text. It appears Nature-based Solutions were not considered for the Project which has roots into the mid-1990s.

9) Inadequate alternatives

Additional reasonable Alternatives are listed below for consideration:

9.1 Reinitiate another update to the Folsom Dam Water Control Manual

Based on the large public response for this Project, it's uncertain if the public was adequately informed of the consequences of the Folsom WCM's project outcome to use the 160 kcfs upper limit for control of a 200-yr storm event. The 160 kcfs limit was chosen as part of an Alternative, in general, for finding a balance between water supply reliability and flood control for a multi-purpose Central Valley Project (CVP) reservoir. With USACE's regional flood control related projects sharing design criteria, the Folsom WCM public outreach may not have



Figure 21 - Watt Bridge area near time of peak flow in Water Year 2017 (~80 kcfs shown), nearing "bank full" conditions, with slow moving/backwater conditions at the levee. Roughly twice as much flow would need to pass through here in a 200 yr storm event given the new 160 kcfs limit chosen for control of a 200-yr event

been sufficient to inform the greater pool of stakeholders affected. It's been shown publicly that much smaller peak flow releases (e.g., a ~120 kcfs limit) can control variously shaped 200-yr event inflow hydrographs, if there's more flood control space and less conservation storage space dedicated (and still assuming forecast informed operations).

With the median annual inflow of Folsom Lake at least twice the capacity of the lake, refill probability is already at a favorable area for water supply reliability for the reservoir. For the Project area, photographic and video evidence shows that for water year 2017, the channel was nearly bank full in places at a peak flow of 85.4 kcfs (picture above shows ~ 80 kcfs near the water year 2017 peak flow at Watt Bridge), and a flow of 160 kcfs (twice as much as is shown above) is interpreted as being unnecessarily risky for Sacramento (and communities to the south) given the LAR channel capacity and its seepage and overtopping thresholds.

9.2 Account for improving future skill in hydrological forecasting and reservoir operations

Every decade, appreciable skill in weather and hydrological forecasting accrues, as do reservoir operational abilities and reservoir decision support systems. Currently, 6- and 10-day reservoir inflow volume forecasts are common products and seasonal to sub-seasonal forecast products are also improving markedly in forecast skill. With the incremental improvement of forecasting and

52
cont'd

ability for reservoirs to use forecasts data formally in operating plans, pre-storm event release effectiveness is expected to substantially increase as decades pass. Under this scenario, peak flows for 200-yr events would likely reduce as storm systems are “seen” sooner than historically. This long-term outlook is consistent with the Project’s effects of removing mature riparian forest, for which centuries are needed for the mature riparian forest to be reestablished.

9.3 Establish a USBR-DWR-USACE team to reevaluate diagnostic and treatment methods for erosion control with modern tools including Nature-based Solutions

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Few agencies have hydrodynamic modeling at flood control magnitudes in their mandate. The Folsom water control manual update was one of the first water control manuals in the nation to explicitly incorporate inflow forecasts into reservoir operation rules. Similar cutting-edge science and engineering should ideally be occurring on the downstream end of the reservoir operations – channel capacity and channel health. Given the age of the ARCF project, and the number of years since the 2016 reevaluation, a reevaluation again appears needed, and with robust peer review and multi-agency collaboration. Could it be possible that modern, affordable, hi-fidelity computation fluid dynamic modeling (such as has occurred for the Feather River or the Route 160 bridge LAR area), a modern erosion observation program (e.g., LiDAR-based), a fresh look at mapping geology and vegetation in detail, and the use of modern sediment transport models, could show that erosion control is not needed for a 160 kcfs flow, or needed in fewer locations if NbS solutions are more fully considered? According to researchers at the Stony Brook University fluid dynamics lab, creating a hi-fidelity, 3D, LES-accommodating model for several miles of LAR of the Project area would possibly need only approximately \$100k of funding and 6- to 12-months to complete. It appears more and more, 3D, detailed hydrodynamic studies are appearing in applied science and engineering, and the LAR, with its dual characteristics of flood risk and critical habitat and resources, seems ripe for having such modelling work. In this Alternative, the coveted recreation space and critical habitat would be getting similar treatment of hydraulic modeling as was done downstream for assessing erosion and scour risk to bridge piers.

54

10) Impacts not adequately categorized

Numerous impacts that were identified as less than significant or short term in the DEIS/SEIR were interpreted by the reviewer to be Significant and Long-term. For example, it’s the professional opinion of the reviewer that impacts to water quality, including water temperature, will be Significant and Long-term. An accurate estimation of likely impacts was not provided in the DSEIS/SEIR, given the scale of resources at risk and the scale of forest removal and channel construction work planned for the river habitat.

Specific Comments

Appendix A – Additional Report Figures, Figures 1 through 8 correspond to the following comments.

11) Erosion control features misalignment with velocity contours

55

Appendix A – Additional Report Figures, Figures 1 through 3 show a subsection of the Project footprint – River Mile 9.1 – 10.5, combining Erosion Protection Method features shown as Site 4-1 and Site 4-2 into one view. Appendix Figures 5 through 7 zoom into River Miles 10 – 10.5 (a portion of Site 4-1). Because the DSEIS/SEIR did not show the Erosion Control Features in context with hydraulic model velocity contour output, these figures show how the features intersect with georeferenced velocity output from the Project’s referenced model (Ayres 2004), with more modern output found online (CBEC Eco Engineering, 2018), and with results of Project geologic mapping conducted in 2012. Also included are topo-bathymetry products available from USGS and referenced above (USGS 1-meter topo bathymetry digital elevation model and USGS 1-meter topographic contour lines. Conducting the review at this level detail brought up several questions.

Zooming in beyond the scale of detail that was presented in the FEIR/FEIS (shown as the upper image in Figure 2 – zoomed out to approximately twelve square miles of Sacramento), it’s apparent that some Erosion Control Protection methods are planned in locations with very slow to stagnant water, and others are not planned in locations with much faster velocity. These two locations are indicated by two ellipses, one with a “?” and one with a “B”. What is the rationale behind this decision?

12) Erosion control feature independence from geology

56

Similar to comment 12, Appendix A – Additional Report Figures, Figure 4 and Figure 8 show how georeferenced Erosion Control Protection Features intersect with mapped geology, as the two were not shown in context with each other in the FEIR/FEIS or SEIR/SEIS or discussed significantly. Some erosion control features are identified to be located entirely within the Lower Erosion Resistant Unit of the Plio-Pleistocene Fair Oaks formation (ie, Launchable Toe protection planned for River Mile 9.4 – 9.7), and in general little to no pattern is discernible connecting planned features to mapped geologic units. What is the rationale behind this decision?

13) Topographic contrasts of erosion control feature placement

57

Similar to comment 12 and 13, Appendix A – Additional Report Figures, Figure 5 shows georeferenced features in context with detailed topo-bathymetric data provided by USGS. At River Mile 10.1 line “A” shows an erosion control feature planned for a very gently sloping river bank and line “B” at River Mile 10.4 shows a considerably steeper and thinner river bank, though with no erosion control features planned from “B” to River Mile ~10.25. What is the rationale behind these decisions?

14) Areas of previous bank protection work are not shown

58

As shown in a picture above in via “Bank Armor” in Appendix A – Additional Report Figures, Figure 8, previous bank protection work has been conducted here by USACE. Without previous work shown, it’s difficult to analyze the project’s past performance and future goals. Why are locations where riprap has been installed previously not included visually in the DSEIR/SEIS’ figures?

References

Ayres Associates, 2004. Lower American River – Erosion Susceptibility Analysis for Infrequent Flood Events.

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Appendix A - Additional Report Figures (8 additional figures)

Figure 1

This figure combines Site 4-1 and Site 4-2 into one view with more resolution than provided in the SEIR/SEIS. Note transects "A" and "B" and ellipses marked by "?" and "B".

related to comment 55

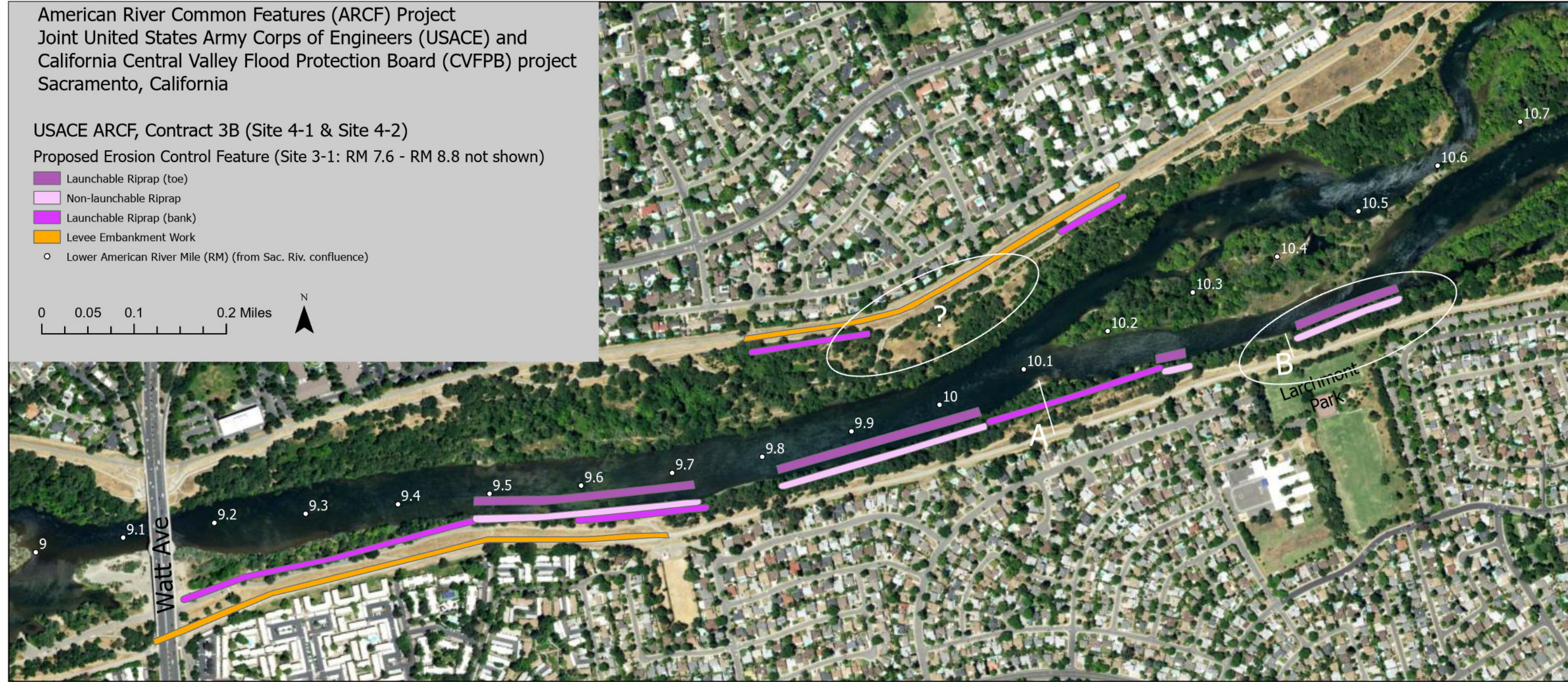
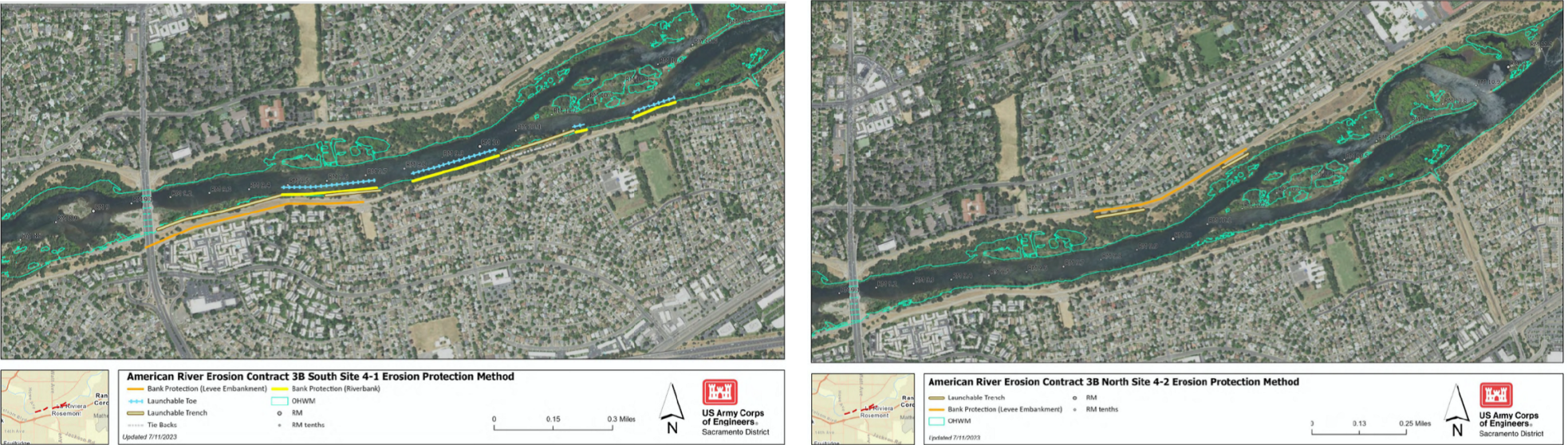
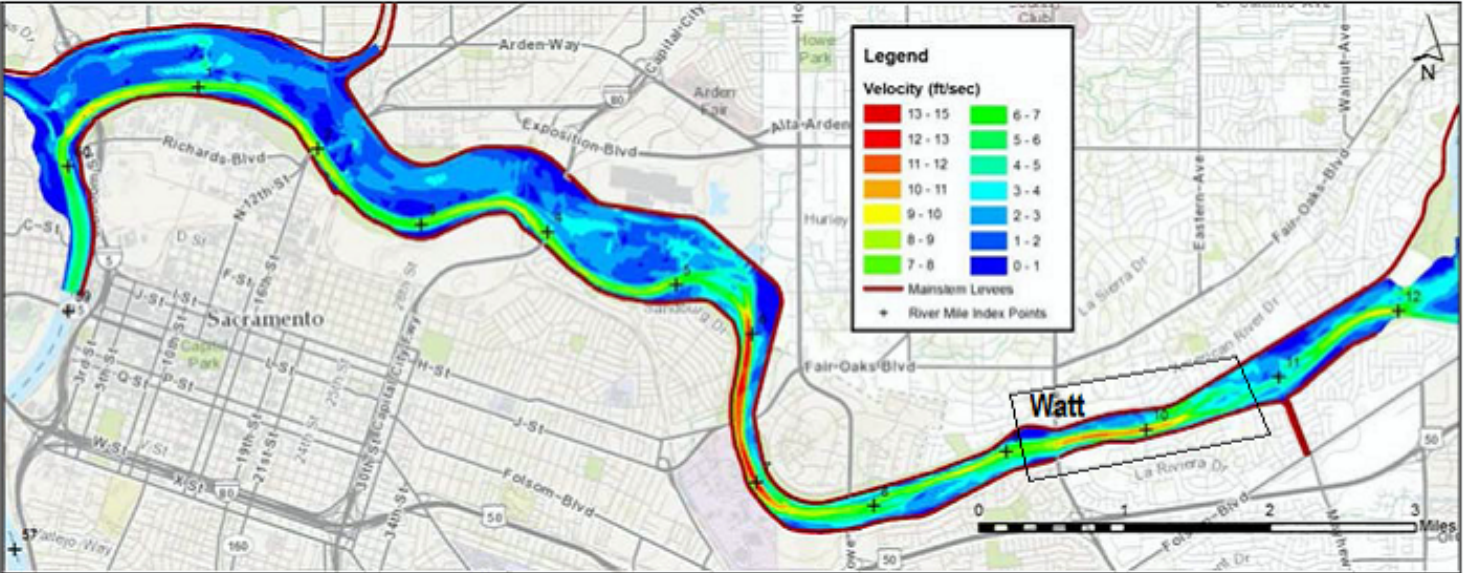


Figure 2

This figure shows the original resolution of the depth-averaged 160 kcfs model velocity output shown in the FEIR/FEIS (at right) and how it's poorly resolved when zoomed into some of the Project footprint (below). Note erosion control features are planned in low-velocity "B" area and none are planned in the higher velocity "?" area where the channel thins.

related to comment 55



ARCF General Reevaluation Report 2015, as part of ARCF Final EIR/EIS (model output: Ayres 2004)

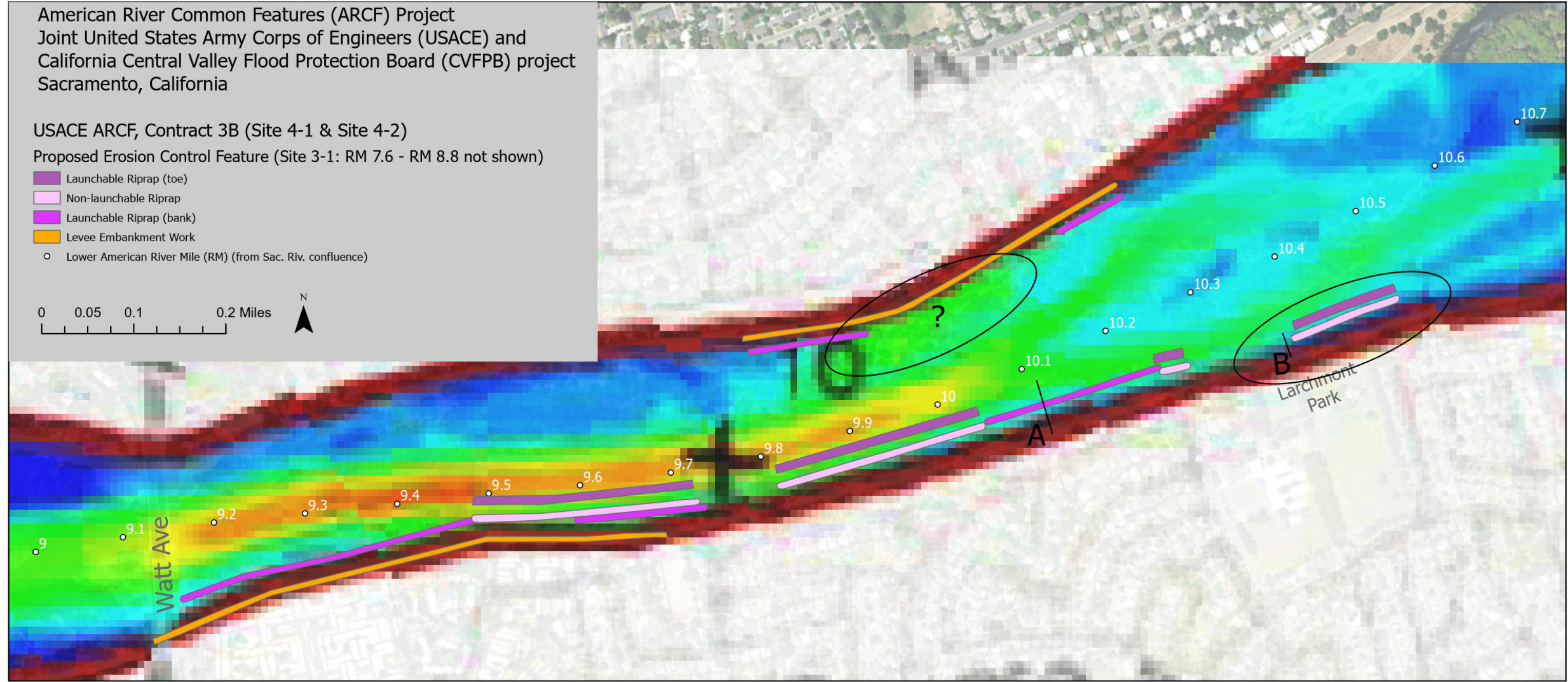
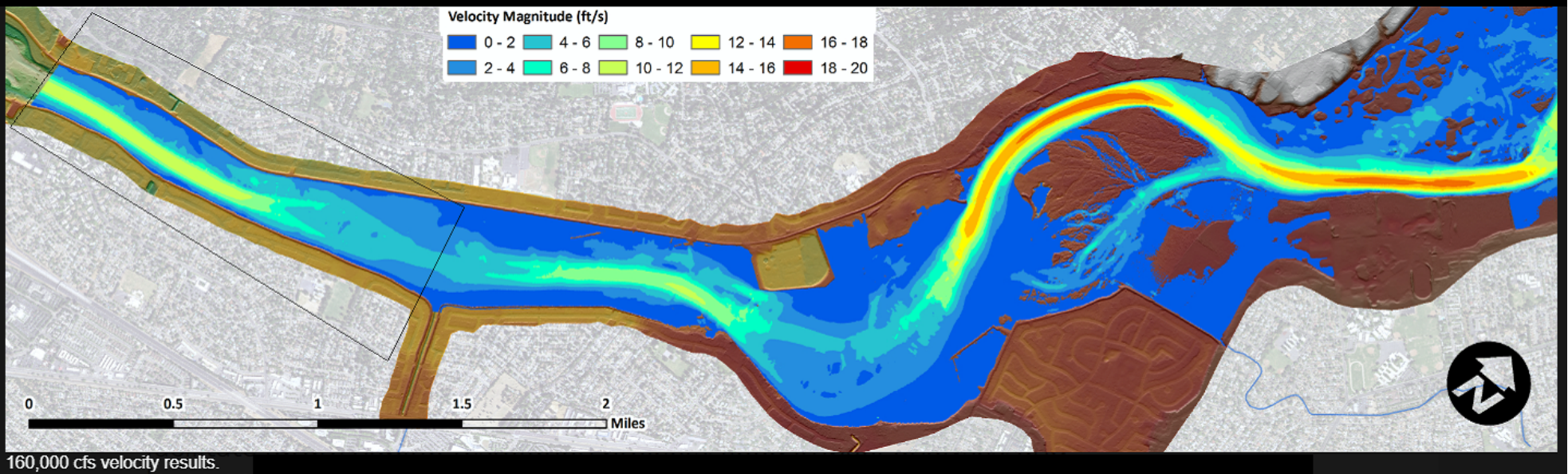


Figure 3

This figure shows the original resolution of the depth-averaged 160 kcfs model velocity output found online (at right) and how it's better resolved than the 2004 output when zoomed into some of the Project footprint (below). Note erosion control features are planned in low-velocity "B" area and none are planned in the higher velocity "?" area where the channel thins.

related to comment 55



<https://www.cbcoeng.com/our-projects/lower-american-river-current-condition-dem-2d-model-development-project/> (2018) (Accessed 6 Feb 2024)

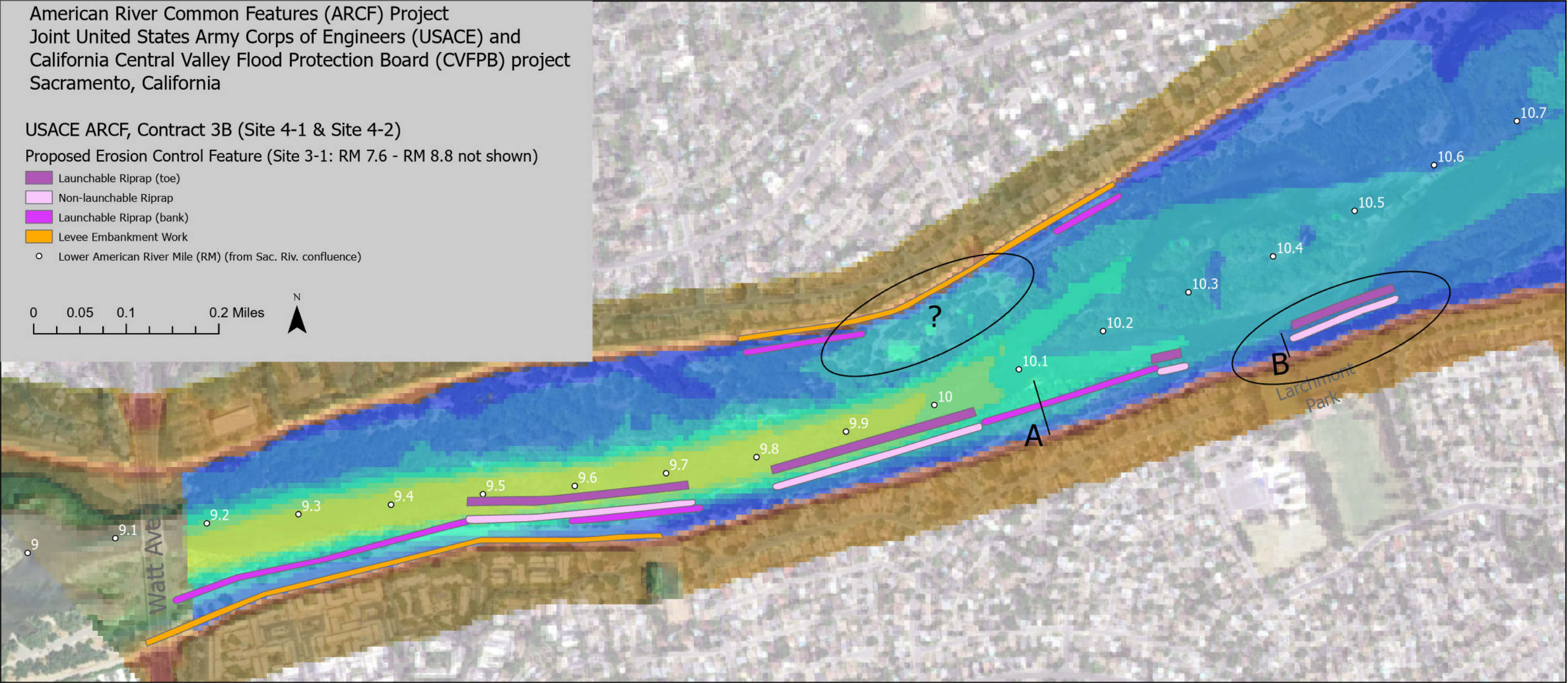


Figure 4

This figure shows the intersection of Erosion Control Features with detailed geologic mapping conducted in 2012 (Fugro 2012). Note some features are planned to be wholly within the Lower erosion resistant unit of the Fair Oaks formation.

related to comment 56

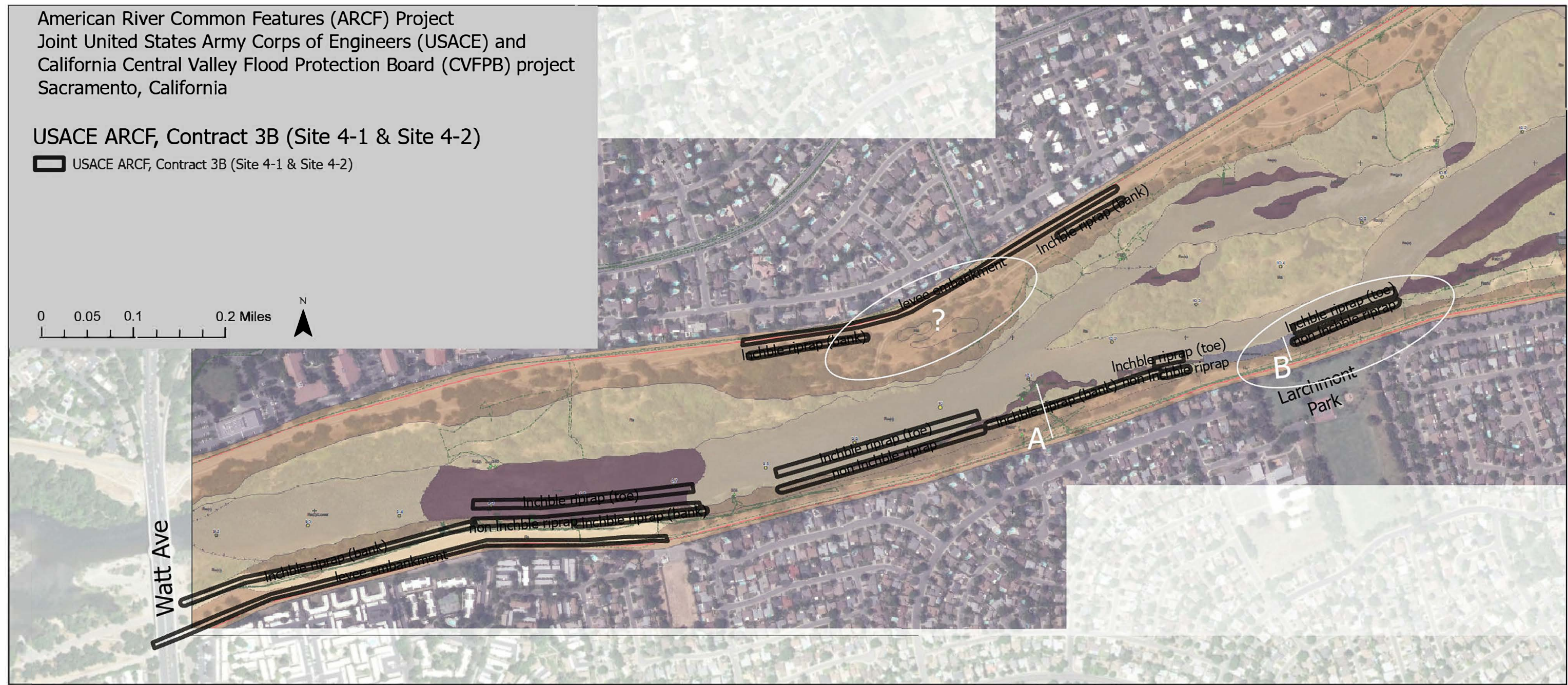


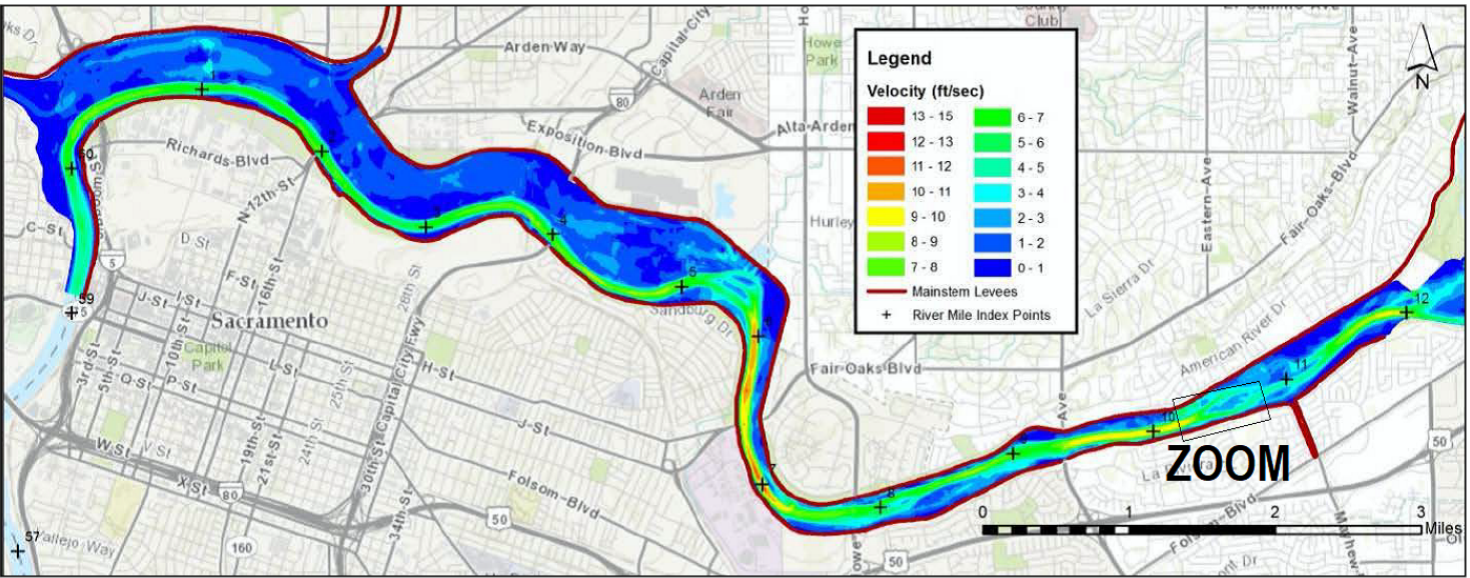
Figure 5 related to comment 55 and 57

This figure shows significant topographic detail that's readily available but not presented in the FEIR/FEIS or SEIR/SEIS and raises questions about the work. Note transect A ("clay banks area") represents a thick, gradually sloped section of riparian forest and at baseflow conditions such as shown below, approximately 350 ft from levee top to river water edge. In contrast, transect B (<150 ft) shows thinner and steeper riparian forest, with no features planned over a considerable downstream area.



Figure 6 related to comment 55

Similar to Figure 2, but zoomed in. This figure shows the original resolution of the depth-averaged 160 kcfs model velocity output shown in the FEIR/FEIS (at right) and how it's poorly resolved when zoomed into some of the Project footprint (below). Note erosion control features are planned in low-velocity "B" area and none are planned in the higher velocity "?" area where the channel thins.



ARCF General Reevaluation Report 2015, as part of ARCF Final EIR/EIS (model output: Ayres 2004) (160 kcfs)

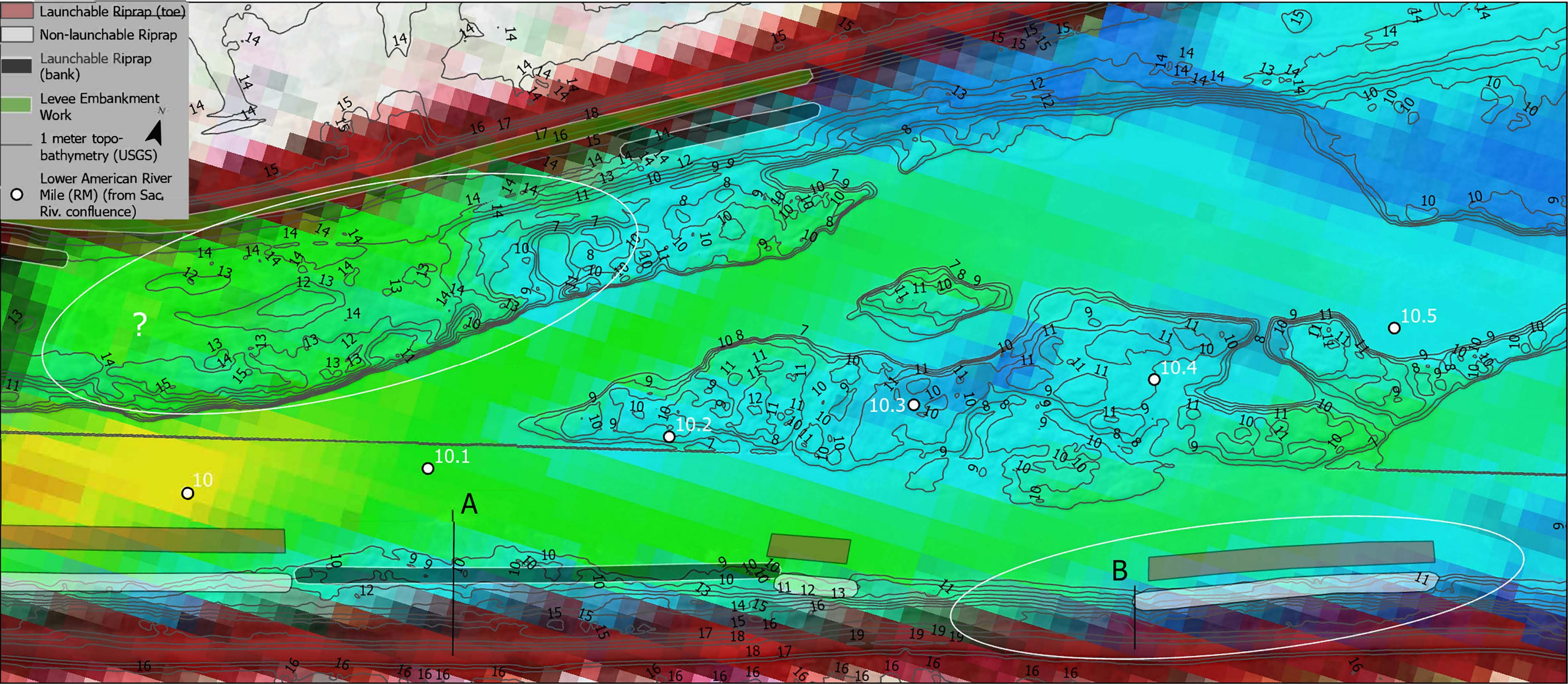
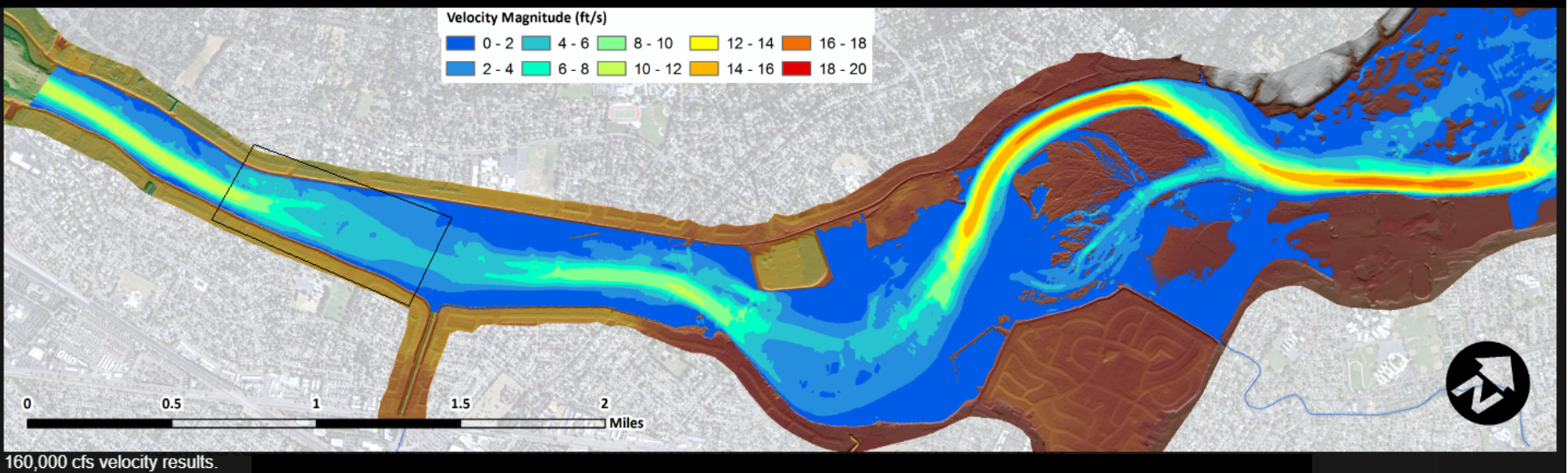


Figure 7 related to
comment #55

Similar to Figure 3, but zoomed in. This figure shows the original resolution of the depth-averaged 160 kcfs model velocity output found online (at right) and how it's more resolved than the 2004 model output when zoomed into some of the Project footprint (below). Note erosion control features are planned in very low-velocity "B" area and none are planned in the higher velocity "?" area where the channel thins.



<https://www.cbecoeng.com/our-projects/lower-american-river-current-condition-dem-2d-model-development-project/> (2018) (Accessed 6 Feb 2024)

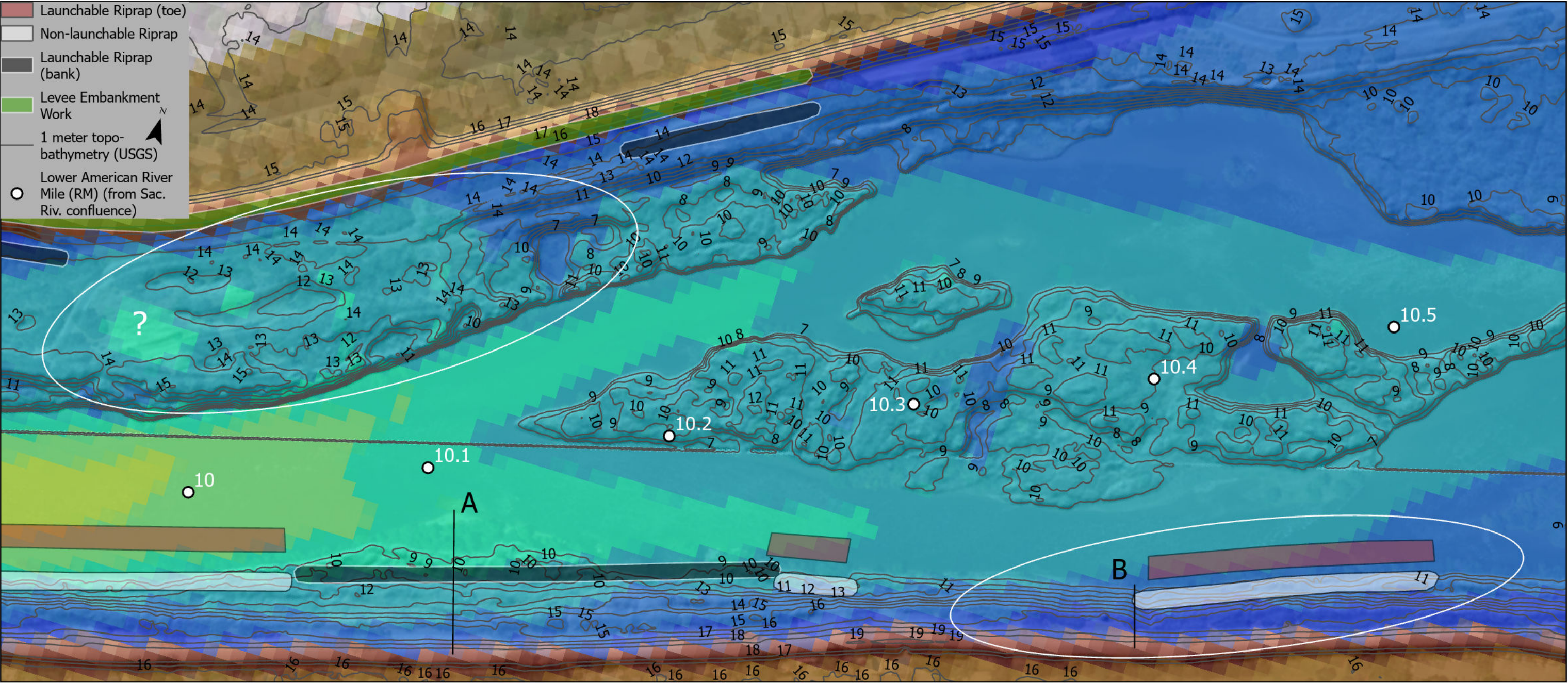
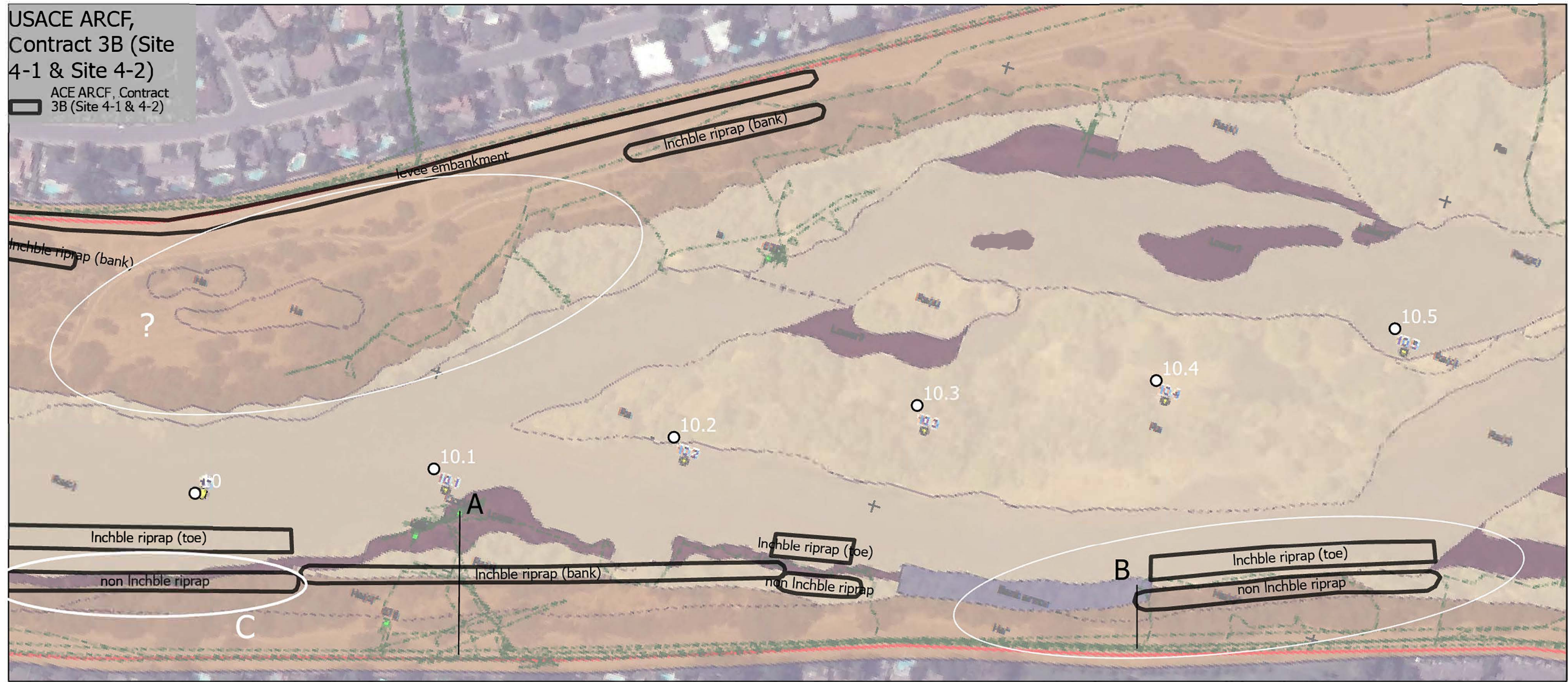


Figure 8 related to comment 56 and 58

Similar to Figure 4, this figure shows the intersection of Erosion Control Features with detailed geologic mapping conducted in 2012 (Fugro 2012). Note "Bank Armor" from previous USACE projects is depicted.



**REGION 9**

SAN FRANCISCO, CA 94105

February 23, 2024

Guy Romine
ARCF Environmental Lead/RTS
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814

Subject: Draft Supplemental Environmental Impact Statement for the American River Common Features 2016 Flood Risk Management Project, EIS# 20230179, Sacramento County, California

Dear Guy Romine:

The U.S. Environmental Protection Agency has reviewed the Draft Supplemental EIS pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment publicly on every environmental impact statement.

intro

The Draft SEIS analyzes major alterations, deletions and footprint expansions to eight erosion protection or flood control proposals and introduces two new compensatory habitat mitigation sites to the 2016 American River Common Features Final EIS. The American and Sacramento River Erosion Contracts and Magpie Creek Project are described and evaluated at a project-level of detail whereas the habitat mitigation sites are described programmatically because there is not enough information currently available to accurately evaluate and analyze potential impacts.

The EPA has reviewed and provided comments on the several environmental documents and related components of the American River Watershed Common Features General Evaluation Report (ARCF).¹ We appreciate that certain matters raised in our previous comments have been considered in this document. For example, the Draft SEIS addresses the need for additional compensatory mitigation

¹ Draft Environmental Impact Report May 4, 2015; Final Environmental Impact Report Feb. 22, 2016; Sacramento River East Levee Contract 1 Draft Environmental Assessment Oct. 2, 2019; Sacramento River East Levee Contract 2 Draft Supplemental EA August 13, 2020; Sacramento Weir Draft Supplemental EIS Sept 14, 2020 and Final SEIS on June 23, 2021; American River Erosion Protection and Arden Pond Mitigation Contract 2 Draft Supplemental EIS July 19, 2021, and Final SEIS on Dec. 13, 2021; Sacramento River Erosion Contract 2 Supplemental EA, May 31, 2022; Sacramento River East Levee Contract 4 Supplemental EA, August 1, 2022; Sacramento River Erosion Contract 4 Supplemental EA, April 13, 2023

with launchable trenches and includes the unhoused in considering socioeconomic impacts. Given the new compressed schedule and the additional or cumulative impacts that could result from design refinements to projects authorized but not built or not considered in the original or supplemental materials, EPA identified environmental concerns in the analysis that should be addressed in the Final SEIS.

EPA §309 Summary

The EPA identified that project components, individually or in combination, have the potential to contribute to exceedances of air and water quality standards even with proposed mitigation. The EPA recommends that such impacts be avoided or further minimized in the preferred alternative in the Final SEIS. Our Detailed Comments, attached below, identify opportunities to modify the construction schedules to reduce cumulative air quality impacts. EPA also includes recommendations to further analyze project components and potential mitigation measures that:

- reduce impacts to riparian, aquatic and aesthetic resources by considering tree removal variance provisions and accounting for temporal effects;
- encourage creating a process to listen to neighborhood concerns and handle construction noise and vibration complaints; and
- commit to supplemental project-level NEPA evaluations for the two proposed American River and Sacramento River mitigation sites.

The EPA appreciates the opportunity to review this Draft Supplemental EIS. When the Final SEIS is released for public review, please notify us and make an electronic version available. If you have any questions, please contact me at (415) 947-4167, or contact Robin Truitt, the lead reviewer for this project, at (415) 972-3742 or truitt.rob@epa.gov.

Sincerely,

JEAN

PRIJATEL

Jean Prijatel

Manager

Environmental Review Branch

Digitally signed by
JEAN PRIJATEL

Date: 2024.02.23
14:16:17 -08'00'

ENCLOSURE

Cc: Nate Martin, U.S. Army Corps of Engineers
Allison Bosworth, National Marine Fisheries Service
Jennifer Norris, U.S. Fish and Wildlife Service
Viktoriya Sirova, U.S. Dept. of the Interior
Karen Huss, Sacramento Metropolitan Air Quality Management District
Dan Tibbitts, Sacramento Area Flood Control Authority
David Moldoff, Central Valley Flood Prevention Board
Tim Kerr, American River Flood Control District

Air Quality

1 The Clean Air Act establishes National Ambient Air Quality Standards for specific air pollutants. The proposed project would occur within the Sacramento Metropolitan Air Quality Management District which is currently designated as a maintenance area for particulate matter with 10 microns or less in diameter (PM₁₀) (pgs. 4-159 – 160). The Draft SEIS indicates that construction emissions would result in significant and unavoidable net increases in criteria pollutants for which the region is in nonattainment and would exceed SMAQMD's emission thresholds for oxides of nitrogen (NO_x), PM₁₀, and PM_{2.5}, and the Sacramento Valley Air Basin's federal General Conformity *de minimus* thresholds for PM₁₀ in 2024, 2025 and 2026. Even with existing mitigation measures AIR 1-5, sensitive receptors and communities with environmental justice concerns would be exposed to substantial pollutant concentrations during construction (Table ES-1; pgs. 4-160 - 162).

2 Where construction activities are found to conflict with standards or implementation plans, the SMAQMD has directed the Corps to incorporate all air quality and greenhouse gas mitigation measures and environmental commitments into the Draft SEIS and reanalyze air quality impacts due to project changes, specifically to determine whether the projects would hinder ozone² attainment efforts in the Sacramento region (App. A, Scoping Materials p. 29/839). However, no changes were made to previously adopted mitigation measures AIR – 1-5. Nor is it clear what best management practices or
3 other on-site controls have been committed to at the various project sites, including the use of Tier 4 off-road equipment and higher-tier marine engines designed to reduce NO_x and PM₁₀ emissions (p. 4-163).

The Draft SEIS indicates that the Corps would pay a mitigation fee to offset remaining NO_x emissions, but states that there are no other feasible mitigation measures, or additional mitigation measures approved by the SMAQMD that could be implemented to further reduce PM₁₀ emissions in construction years 2024, 2025, and 2026 (p. 4-163). The Corps anticipates the need to update or amend the General Conformity Report to account for the compressed construction schedule (from 14 to 8 years) and emissions from hauling materials from farther away and states that the final report would be included in the Final SEIS (App. A, pgs. 52-53/839).

Recommendations for the Final SEIS:

- 4 • Summarize updates or amendments to the General Conformity Report due to changes to the construction schedule. Describe how the proposed actions would comply with all Federal air quality standards and requirements.
- 5 • Commit to Tier 4 engine standards or list the reasons why an exception would apply to seepage and stability equipment needed on the remaining contracts.
- 6 • Consider managing the start dates and duration of individual projects relative to each other and other proposed projects mentioned in Chapter 5 *Cumulative and Growth Inducing Effects* to minimize the potential for adverse cumulative impacts to air quality in the basin.

² Ozone is a secondary pollutant that is not emitted directly into the atmosphere but is formed by the reaction of two ozone precursors: reactive organic gases (ROG) and nitrogen oxides (NO_x) (p. 4-159).

Water Quality

7 The Corps obtained a term-limited, programmatic Clean Water Act section 401 water quality certification for the 2016 ARCF project from the Central Valley Regional Water Quality Control Board (CVRWQCB). The Draft SEIS states that each individual project would request coverage under this overall permit which could include project-specific requirements to ensure attainment of water quality standards (p. 6-2). If any of the 2016 ARCF Projects extend past the sunset date of July 12, 2026, the Corps would be required to either amend its current permit or obtain a new permit from the CVRWQCB.

8 The Corps would also obtain separate 401 Water Quality certifications for the two proposed mitigation sites (App. B, p. 3.4-5). Habitat mitigation features at the American River Mitigation Site would include breaching the existing 58-acre man-made pond to connect it with the American River and grading the site to create channels and floodplain forest for juvenile salmonid habitat. At the Sacramento River Mitigation Site water quality impacts could result from construction equipment breaching the existing levee and grading of the site to create channels that expose the interior of the island to tidal influence (p. 4-158).

9 Additionally, the Draft SEIS states that short-term, significant and unavoidable impacts to water quality could arise during construction of launchable toe erosion protection during the in-water work window and that loss of shade along portions of the reach would result in impacts on water temperature in the river. Substantial in-channel work involving the realignment and levee widening of Magpie Creek that would remove channel vegetation could result in erosion and downstream sedimentation (pgs. 4-156-157).

10 The Draft SEIS states that *short-term* water quality impacts would be minimized, and *long-term* minor or moderate effects would be less than significant with the implementation of Mitigation Measures GEO-1, HAZ-1, WATERS-1, and WQ-1 (pgs. 4-155 – 4-158). These conclusions may need to be updated after designs are refined and management plans are developed to quantify areas of disturbance expected, number of trees removed, or the extent of fill material needed for mitigation (Tables ES-1 and 4.3.4-1 *Summary of Water Quality Effects*).

Recommendations for the Final SEIS:

- 11 • Assess the ability of individual project components to receive CWA 401 Certifications from the Regional Water Quality Control Board based on the projected short-term impacts to temperature, erosion and sedimentation.
- 12 • Continue to work with the Central Valley Regional Water Quality Control Board as designs are refined and management plans developed to outline any additional or amended avoidance and minimization measures needed to ensure compliance with the Basin Plan and protect beneficial uses.

Riparian And Wetland Habitats

13 Approximately 65 acres of riparian habitat would be removed throughout the lower American River and 73 acres removed along the Sacramento River but mitigated with new riparian habitat on-site or at other approved mitigation sites (pgs. 4-186-187). Compensatory mitigation for habitat removal and

adverse effects to fish and wildlife resources is established by either the Section 7 Endangered Species Act Biological Opinions of the National Marine Fisheries Service or U.S. Fish and Wildlife Service or through U.S. Fish and Wildlife Coordination Act reports (identified as “CAR” in the Draft SEIS) that evaluate impacts to fish and wildlife and identify mitigative design changes, alternatives or projects needed for resource protection (16 U.S.C. §§661-666).

14 The Draft SEIS states that the proposed Erosion Contracts and Magpie Creek project would have short-term, significant and unavoidable adverse effects on riparian habitat and other sensitive natural communities identified in local and regional plans (Table ES-1 *Summary of Effects and Mitigation Measures*). Permanent unavoidable impacts to vernal pools at Magpie Creek, elderberry shrub habitat, shallow water habitat and riparian and upland habitats are expected (p. 4-210). Additionally, the contracts and mitigation sites could have substantial adverse effects on state or federally protected wetlands through direct removal, fill, or hydrological interruption (Table ES-1).

Tree Removal

15 The flood control projects along the American River, as refined from previous environmental analyses, incorporate alternative erosion protection measures to minimize impacts to heritage oaks, riparian habitat, and to create higher-quality on-site mitigation (p. 3-3). We appreciate that the proposed project attempts to balance greenbelt functions and habitats – native willow, cottonwood, and oak-dominated riparian and upland woodlands that provide important shaded riverine aquatic habitat – with levee protection to control sustained high flows in the river (up to 160,000 cubic feet per second).

The Corps has national standards for the creation of a vegetation free zone that includes the levee itself plus a corridor 15’ wide on either side of the levee. While retaining safety, structural integrity, functionality, and accessibility, a variance from these guidelines is possible if it is necessary and the only feasible means to preserve, protect, and enhance natural resources.³ We note that the American River Parkway management plan that authorizes vegetation removal under certain circumstances requires compensatory mitigation for unavoidable impacts (p. 2.4-16).

The Draft SEIS notes that the Erosion Contracts 3B North and South and 4B could require the removal of a significant number of trees causing unavoidable adverse impacts to riparian habitat and notes that removed native trees may not be replaced in all instances (pgs. 3-42, 4-192). It further states that the Corps would seek a design deviation to avoid the removal of heritage oaks from this zone if the trees could serve as erosion protection (pgs. 3-42, 3.1-25). Similarly, the original 2016 ARCF Final EIS stated that a vegetation variance would be obtained for Sacramento Erosion Contract 3 and leave 930 large trees on the lower part of the waterside slope but would remove all trees within the rock placement footprint to allow equipment to operate more efficiently (2016 FEIS p. 124; p. 4.1-36). It is not clear whether or to what extent the vegetation variance was granted.

Recommendations for the Final SEIS:

- 16
- Discuss what factors or variables would be used to identify which trees could be left in place and identify the qualifications of the persons who would make these determinations.

³ If vegetation is to remain in the vegetation free zone, then a design deviation would be required pursuant to a system-wide improvement framework (see p. 4.1-22).

- Identify those areas under each project component where there is neither the slope or space to allow trees or other riparian vegetation to reestablish (e.g., no space for soil filled revetments or planting benches) and where strict adherence to Vegetation Management Zone guidelines would be required.
- Provide an update on the vegetation variance for the Sacramento Erosion Contract 3 to provide context for the likelihood of a variance in currently proposed project areas.

Temporal And Cumulative Impacts

The Draft SEIS concludes that Erosion Contracts 3B North and South and 4A would result in short-term, significant and unavoidable impacts from the temporary loss of vegetation and wildlife habitat until the time when compensatory plantings have fully matured. Once Mitigation Measures VEG-1 and VEG-2 are implemented and vegetation establishes, the Draft SEIS concludes that there would be long-term, less than significant impacts to riparian habitat (p. 4-192).

Resource agencies typically require high mitigation ratios when new habitat is created (App. B, p. 3.4-9). The Corps has guidance for setting higher mitigation ratios when compensatory, constructed habitat is required.⁴ Where there is a lag time between when the impacts occur and the time it takes for mitigation to mature and replace lost functions, the Corps instructions increase the mitigation ratio for the loss of trees or woodlands to 3:1.

The EPA appreciates that the cumulative effects analysis considers the temporal effects of past and projected projects that would affect the project areas in 2025 through 2028. American River Erosion Contracts 1, 2, and 3A have already impacted 33.14 acres of riparian habitat of the total 73 acres expected along the American River (pgs. 4-192, 4-1-36).

Recommendations for the Final SEIS:

- Prepare a CWA Section 404(b)(1) evaluation for discharges of fill into federal waters that:
 - accounts for temporal and cumulative loss of riparian habitats and aligns 'short-term' and 'long-term' definitions in the context of time needed to reestablish vegetation and restore loss functions to use as the basis of significance for impact determinations;
 - assesses the permanent fill footprint and quantifies the amount of compensatory mitigation required by mitigation ratios for permanent and temporal impacts under the USFWS and NMFS Coordination Act Report; and
 - identifies the least environmentally damaging practicable alternative to each project.
- Append the Final 404(b)(1) report to the Final SEIS and summarize the analysis in the body of the Final SEIS.
- Consider staggering the start dates and duration of proposed project components relative to the construction schedules of similar or related flood control, bank protection, dam raise, and restoration efforts or projects listed in Chapter Five *Cumulative and Growth Inducing Effects* to minimize the potential for cumulatively significant impacts to riparian-dependent and aquatic species and their habitats.

⁴ *Instructions for Preparing Mitigation Ratio Setting Checklist*, No. 8 Temporal Loss, [https://www.spa.usace.army.mil/Portals/16/docs/civilworks/regulatory/Mitigation/12501-SPD.02%20Instructions for Preparing Mitigation Ratio Setting Checklist 20160726 CORRECTIONS.pdf?ver=2017-01-20-121857-760](https://www.spa.usace.army.mil/Portals/16/docs/civilworks/regulatory/Mitigation/12501-SPD.02%20Instructions%20for%20Preparing%20Mitigation%20Ratio%20Setting%20Checklist%2020160726%20CORRECTIONS.pdf?ver=2017-01-20-121857-760)

- 23 • In consultation with resource agencies, analyze whether trees and vegetation should be removed before the two proposed off-site compensatory mitigation sites are further along in design and development considering the time required for full replacement of functions. Consider using semi-mature trees (e.g., 5-8 years old) to replace lost trees to increase survivorship and provide shaded riverine habitat more quickly.
- 24 • Consider increasing the ratio of compensatory mitigation if recommended by resource agencies to protect threatened, endangered or sensitive species.

Mitigation

Mitigation Measure WATERS -1 states that the project partners would compensate for fill of state and federally protected waters, including wetlands, to ensure no net loss of functions and values.

25 Mitigation may be accomplished through habitat replacement, enhancement of degraded habitat, off-site mitigation at an established mitigation bank, contribution of in-lieu fees, or other methods acceptable to the regulatory agencies and in accordance with requirements under Clean Water Act Section 404. In 2021, the National Marine Fisheries Service and the U.S. Fish and Wildlife Service issued amended Biological Opinions for the ARCF 2016 Project (p. 4-207). The EPA understands that active coordination and reinitiated consultations with NMFS and the USFWS concerning new Biological Opinions or Coordination Act Reports may outline additional measures to reduce impacts to less than significant levels (p. 4-205).

Recommendations for the Final SEIS:

- 26 • In consultation with the NMFS and USFWS, use the Standard Assessment Method of analysis to identify site-specific conditions based on actual designs to evaluate habitat values, determine impacts and quantify compensation needed.
- 27 • Prepare a detailed Habitat Mitigation, Monitoring, and Adaptive Management Plan that maximizes the ecological function and value within the existing levee system in the Sacramento metropolitan area and includes conservation measures and compensatory mitigation that is adequate to offset lost functions and values.
- 28 • Develop a Vegetation Management Plan to ensure that native riparian plantings installed within the planting benches are protected, watered, and monitored for an adequate period following installation and are ecologically sustainable.
- 29 • Commence adaptive management upon completion of the plantings and monitor as necessary to ensure that long-term success criteria are met. Provide a copy of these requirements to the local sponsors and contractors who may be involved in implementing the plans.
- 30 • Summarize all mitigation and monitoring requirements, performance standards, and success criteria found in Biological Opinions, subsequent remedial actions or adaptive management tasks, monitoring timeframes, and long-term maintenance obligations.
- 31 • Include in the appendices the 2021 Biological Opinions, the Launchable Rock Durability Analysis, and any updated Biological Opinions or Coordination Act reports drafted because of continued coordination and reinitiated consultations. Outline new or site-specific measures or mitigation that would be needed to reduce impacts to less than significant.
- 32 • The EPA encourages the beneficial re-use of suitable sediments to augment, fully restore or create aquatic wetland habitats. Identify all potential sites available for the temporary or permanent placement of uncontaminated dredged materials, including on-site planting benches and at the American and Sacramento River Mitigation Sites.

American River and Sacramento River Mitigation Sites (ARMS, SRMS)

The National Marine Fisheries Service is requiring that large mitigation site(s) for salmonid habitat on the American River be constructed concurrently with erosion protection construction. It notes that delayed mitigation construction would result in increased mitigation acreage requiring additional sites and increased costs (p. 3-3). The Draft SEIS states that the previously proposed mitigation sites have insufficient project lands to fully address salmonid mitigation needs and are heavily used for recreation creating public and local agency concerns (p. 3-6). The American River and Sacramento River mitigation sites have since been proposed to resolve that deficiency.

- 33 The Draft SEIS describes and analyzes the ARMS and SRMS at a programmatic level of detail as the selected sites for these actions are still early in the planning phase and substantial information is not currently available to accurately describe impacts at a project level of analysis (p. ES-2). As described broadly, the ARMS would include breaching an existing 58-acre man-made pond to connect it with the American River and grading to create channels and floodplain forest for juvenile salmonid habitat. The Draft SEIS states that known metals and petroleum hydrocarbons are present at the ARMS and would need to be treated, removed or disposed pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act prior to transfer to the Corps (pgs. 4-181; 3.8-15). Habitat mitigation at the SRMS would entail breaching the existing levee and grading the site to create one or more channels and expose the interior of the island to tidal influence. There is a closed municipal solid waste landfill located on the eastern portion of the site which would be avoided. The western portion has been used as a dredged material disposal site and these materials would be tested to assess their suitability for use in mitigation features (p. 4-158).

To the extent that site-specific project investigations, design or construction activities reveal significantly changed conditions, have the potential to violate any federal, state or local laws or regulatory limits or increase adverse environmental and human health impacts, supplemental NEPA documentation may be warranted.

Recommendations: Should supplemental NEPA documents be needed to address impacts from the mitigation sites, the EPA recommends that those documents include:

- an analysis of investigative, testing, treatment and disposal approaches for hazardous materials and potentially contaminated sediments at the ARMS and SRMS sites;
- coordination with the Central Valley RWQCB and non-federal sponsor to develop cleanup plans for the ARMS site; and
- avoidance, minimization and mitigation measures that detail success criteria, monitoring and reporting protocols and contingency plans to be implemented if the initial mitigation fails (pgs. 4-200, 4.1-41).

Noise And Vibration

- 37 The Draft SEIS states that accepted guidance levels for vibration impacts and local noise limits would be exceeded by construction activities for American River Erosion Contracts 3B North and South, Contract 4A, Contract 4B, Sacramento River Erosion Contract 3, the Magpie Creek project and ARMS (p. 4-170). Heavy-duty equipment may damage structures located within 25 feet of construction activity when vibration levels exceed 0.2 inch per second peak particle velocity (p. 4-173). The closest sensitive

receptors,⁵ including residential structures and recreational sites, to American River and Sacramento River erosion construction areas and haul routes range from 25-400 feet and would experience significant, temporary increases in ambient noise levels and could damage structures (p. 4-170).

37
cont'd

The Draft SEIS states that excessive noise sensitivity could be expected when daytime construction occurs within approximately 600 feet of existing sensitive land uses and nighttime construction occurs within 1,200 feet of existing sensitive receptors. Mitigation Measure NOI-1 is expected to reduce significant construction-related noise generation to the extent feasible by requiring the preparation of a noise control plan, implementing feasible best management practices such as placing noise barriers between the construction site and nearby residences, and notifying sensitive users of excessive noise generation during the day (p. 4-172).

Recommendations for the Final SEIS: Where noise and vibration levels have the potential to exceed significance thresholds, the EPA recommends that a Vibration Monitoring and Noise Control Plan be developed that includes the following provisions.

- An on-going outreach strategy with residents and contractors before and during construction to discuss whether there are any feasible or practical alternatives to staging area locations or haul routes or to address public concerns. Discuss whether all construction, hauling or staging activities, not just the loudest and most intrusive activities, would occur within permitted hours, and discuss where and when nighttime work may be expected.
- Written notice of the construction schedule to residents located within 1,200 feet of the construction zone that includes City and County Noise Ordinance limits and hours, Mitigation Measure NOI-1's applicable minimization measures, and a link to the USACE Construction Inquiry Form⁶ to advise residents of the process for handling their concerns related to impacts from levee construction.
- A commitment to respond immediately to complaints or inquiries. Include a name, phone number or email address in the notice materials. The EPA recommends that this information be provided at least a month prior to the onset of construction activities at that location.
- The evaluation of previous structural complaints or claims to evaluate the distance where damages were attributed to vibration and include all structures to be included within pre-construction surveys within this distance.
- A warning system at less than the maximum vibration levels of 0.2 to 0.5-inch per second to indicate when work would cease and what changes could be made to equipment or methods to reduce vibrations. Identify key personnel to be notified once this level is reached and who would be responsible for stopping work temporarily.

Environmental Justice and Community Engagement

The Draft SEIS identified the presence of disadvantaged communities, defined as those that are marginalized, underserved, and overburdened by environmental hazards (p. 4-133). While recognizing that known disadvantaged communities would be at risk of flooding and could incur damages to homes, properties, and businesses without current design refinements, the Draft SEIS also notes that

⁵ Residential areas, schools, day care, and recreationists using the Parkway, bike trails, and local parks including Miller Park, Discovery Park, and Garcia Bend Park, are identified as sensitive noise receptors. In addition, local wildlife near the American and Sacramento River, and Magpie Creek are considered sensitive receptors.

⁶ https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/web/USACE-Construction-Inquiry-Form.pdf

project components could directly and cumulatively increase traffic and exposure to airborne particulate matter, disrupt transportation to schools, and displace unhoused individuals residing alongside the rivers and Magpie Creek (pgs. 4-133/134, 5-18). These impacts would be significant and unavoidable even with Mitigation Measures AIR-1 and 2 and TRANS-1 (p. ES-11).

The EPA appreciates that the Draft EIS identified well-established communities of unhoused individuals in and near the project sites and met with homeless advocacy groups (pgs. 4-134, 6-7). The EPA is aware that affected unhoused communities could be displaced and require relocation under existing City and County codes and ordinances even in the absence of active construction. The Draft SEIS concludes that there would be less than significant impacts to the unhoused population of the greater Sacramento area and no mitigation would be required (p. 5-19).

We note that tree removal was the main source of contention at the public meeting on January 10, 2024, where many participants expressed concerns about potential impacts to the visual landscape and the prime aesthetic quality of the American River Parkway. People testified that the project area could become less scenic, dangerously hot, and diminish recreational opportunities as well as biodiversity. They also asked for more information about the ability of trees to increase levee stability and limit bank erosion. Because questions were not answered in the on-line forum, many requested additional in-person meetings and/or more time granted to submit comments on this Draft SEIS. The Draft SEIS's Chapter Seven *Public Involvement Coordination* is only a single page and does not provide enough information to inform decision-makers of community needs, concerns, or suggestions.

Recommendations for the Final SEIS:

- 43 • Summarize the perspectives of communities with environmental justice concerns or their representatives as solicited directly or through the two virtual forums held in January, 2024.
- 44 • Provide additional opportunities for public engagement in affected neighborhoods to further understand their concerns and, while discussing the reasons for tree removal, the process for selecting trees to be retained and the minimization and mitigation measures that would be used to limit or compensate for adverse impacts.
- 45 • Consider using local expertise, information and research to inform the project design refinements and to avoid a one-size-fits-all approach.
- 46 • Provide additional information to affected communities about alternate routes to schools that stem from road closures; who would be responsible for assisting unhoused individuals removed from the project area and how that assistance could be accessed; and the potential for property acquisition and the process for obtaining relocation assistance.



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

In response refer to NMFS ECO#: WCRO-2020-03082

February 23, 2024

Mr. Guy Romine
US Army Corps of Engineers
1325 J St
Sacramento California 95814

Re: Reinitiation of Consultation for the American River Common Features Project for actions as proposed in the 2023 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report.

Dear Mr. Romine:

This letter is in response to the December 1, 2023, submittal of the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) for the American River Common Features Project (ARCF) to the National Marine Fisheries Service (NMFS) for review. These comments are provided as technical assistance and not intended to take the place of formal consultation as required under the Federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

The purpose of the ESA is to provide a means whereby the ecosystems upon which endangered and threatened species depend may be conserved, and to take steps that may be appropriate to achieve this purpose of recovery of listed species. Under section 7(a)(1) of the ESA, all Federal agencies are directed to use their authorities by carrying out programs to further the purpose of the ESA, which is to recover threatened and endangered species and the ecosystems on which they depend. Under section 7(a)(2) of the Endangered Species Act (ESA), each Federal agency must insure that their actions are not likely to appreciably reduce the likelihood of both the survival and recovery of any threatened or endangered species in the wild. It is important to point out that the jeopardy standard includes consideration of both survival and recovery.

NMFS issued an ESA section 7 Biological Opinion (BO) for the ARCF Project in 2016. In 2020, the U.S. Army Corps of Engineers (USACE) requested reinitiation of consultation resulting in the NMFS 2021 BO (2021 BO). As is described in the 2023 SEIS/SEIR (Appendix B 4.3-1), the proposed action has since changed from that described in the 2020 USACE Biological Assessment (BA, 2020 BA) and subsequent 2021 BO. In addition to new potential mitigation sites, project changes include the removal of previously proposed mitigation sites, updates to overall project schedule and design changes which are described throughout the proposed action in the SEIS/SEIR document. In October 2022, NMFS recommended that USACE reinitiate consultation for ARCF due to concerns that project changes would result in new effects, and changes to the manner or extent of effects, to listed species that were not previously considered



in the 2021 BO. Since February 2023, USACE and NMFS have been in coordination to develop a programmatic BA for the reinitiation.

Reinitiation of formal consultation is required and shall be requested by USACE or by NMFS, where discretionary Federal involvement or control over the action has been retained or is authorized by law and one or more of the following reinitiation triggers identified in 50 CFR 402.16 has been met; “(1) If the amount or extent of taking specified in the incidental take statement is exceeded; (2) If new information reveals effects of the action that may affect listed species or critical habitat in a manner or to an extent not previously considered; (3) If the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the BO; or (4) If a new species is listed or critical habitat designated that may be affected by the identified action.” Changes to the ARCF construction schedule and mitigation plan have resulted in reinitiation triggers as described below:

Project Timing:

1 The ARCF project schedule in the 2020 BA and 2021 BO expected all construction activities completed by 2024. The currently proposed schedule includes impacts through 2027. This schedule change results in differences in the manner and extent to which listed fish are affected, including, but not limited to, exposure of additional generations of listed fish to construction effects. These effects were not considered in the 2021 BO (trigger 2) thus requiring reinitiation.

Off-site Mitigation:

2 The 2021 BO describes off-site mitigation for designated critical habitat on the American River occurring at the Arden Pond location at river mile 12. The proposed action in the 2023 draft SEIS/SEIR identifies American River offsite mitigation as occurring at the American River Mitigation Site (ARMS) located at river mile 1.3. Off-site mitigation at the ARMS site was not included in the proposed action of the 2020 BA and thus associated effects were not considered in the 2021 BO. Off-site mitigation on the Sacramento River is described in the 2021 BO as a large-scale site which would be substantially complete concurrent with or immediately following construction impacts (December 31, 2024). Under the current proposed construction schedule the timing of construction of the Sacramento River Mitigation Site (SRMS) will differ in its relative occurrence to project impacts at each contract. Both the American River and Sacramento River proposed mitigation sites differ between the 2021 BO and the current updated proposed action. Differences include location, timing, existing on-site features, proposed features, and extent of construction impacts. These differences result in new effects as well as changes in the manner and extent of effects to listed fish that were not previously considered in the 2021 BO (triggers 2 and 3) thus requiring reinitiation.

3 ESA Section 9 prohibits the taking of listed species. The incidental take statement (ITS) in the 2021 BO provides USACE exemption from section 9 prohibitions so long as the terms and conditions of the ITS are adhered to. This protective coverage is limited to the actions as proposed and analyzed in the 2021 BO. Reinitiation of consultation must occur in order for USACE to update take exemption for all aspects of the project that result in adverse effects

(including any new) to listed species or differ from the 2021 BO proposed action in manner or extent of effect. For aspects of the project which continue to occur consistent with the proposed action in the 2021 BO, existing exemptions will continue to apply during the reinitiation process. Once a new BO is issued it will replace the 2021 BO, thus the 2021 BO will no longer be in effect. Any project action occurring after the issuance of the reinitiated BO must occur consistent with the incidental take statement of that BO to maintain exemption from section 9 prohibitions. Therefore, it is important that consideration be made now for the formulation and implementation of means to minimize potential take of listed species for the duration of the project through 2027. The prohibitions of ESA section 7(d) would apply such that USACE shall not make any “irreversible or irretrievable commitment of resources” with respect to its action that have the “effect of foreclosing the formulation or implementation of any reasonable and prudent alternatives” that would avoid jeopardizing a listed species or destruction or adverse modification of critical habitat in the reinitiation. Activities that result in permanent habitat loss would likely preclude potential habitat alternatives within the project area and may be a violation of section 7(d). These prohibitions apply to any project actions for which USACE will seek to obtain take exemption from section 9 prohibitions under the upcoming reinitiated BO. Failure to observe this provision can disqualify the agency or applicant from seeking an ESA take exemption under section 7.

NMFS also reminds USACE of their obligation to use the best scientific and commercial data available to fulfill their requirements under Section 7(a)(2). To assure the quality of the biological, ecological, and other information used in the implementation of the ESA, it is NMFS’ policy to evaluate all scientific and other information used to ensure that it is reliable, credible, and represents the best scientific and commercial data available. Between 2021 and 2023 a series of peer reviewed journal articles (Flora, K. and Khosronejad, A., 2021-2023) were published which discuss hydrology on the Lower American River in flood flow conditions. In some cases, these studies overlapped with the ARCF project area on the Lower American River. The findings of these publications, and any others which constitute the best available scientific and commercial data, should be considered by USACE in their reinitiation to inform their project design in order to fulfill their obligations under section 7 and avoid/minimize effects to listed species and their critical habitat.

We appreciate the opportunity to continue to provide input and look forward to working with USACE to ensure that the ARCF Project adequately addresses and analyzes potential project related impacts to ESA listed species. Please direct questions regarding this letter to Lyla Pirkola in NMFS’ California Central Valley Office via email at lyla.pirkola@noaa.gov or via phone at (916) 930-5615

Sincerely,

A. Catharine Marcinkevage

Cathy Marcinkevage
Assistant Regional Administrator
California Central Valley Office

cc: To the File ARN 151422-WCR 2020-SA00019

Literature Cited:

- Flora, K. and Khosronejad, A., 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*.
- Flora, K. and Khosronejad, A., 2022. Uncertainty quantification of large-eddy simulation results of riverine flows: A field and numerical study. *Environmental Fluid Mechanics*, 22(5), pp.1135-1159.
- Flora, K. and Khosronejad, A., 2021. On the impact of bed-bathymetry resolution and bank vegetation on the flood flow field of the American River, California: Insights gained using data-driven large-eddy simulation. *Journal of Irrigation and Drainage Engineering*, 147(9), p.04021036.
- Flora, K., Santoni, C. and Khosronejad, A., 2021. Numerical study on the effect of bank vegetation on the hydrodynamics of the American River under flood conditions. *Journal of Hydraulic Engineering*, 147(9), p.05021006.



Central Valley Regional Water Quality Control Board

5 February 2024

Susanna Real
Central Valley Flood Protection Board
3310 El Camino Avenue, Suite 170
Sacramento, CA 95821
susanna.real@water.ca.gov

COMMENTS TO REQUEST FOR REVIEW FOR THE JOINT DOCUMENT, AMERICAN RIVER COMMON FEATURES, 2016 FLOOD RISK MANAGEMENT PROJECT, SCH#2005072046, SACRAMENTO AND YOLO COUNTIES

Pursuant to the State Clearinghouse's 22 December 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Joint Document* for the American River Common Features, 2016 Flood Risk Management Project, located in Sacramento and Yolo Counties.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

1 The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

the State Water Resources Control Board (State Water Board), Office of Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

2 In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

3 Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

Clean Water Act Section 404 Permit

4 If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

Clean Water Act Section 401 Permit – Water Quality Certification

5 If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

6 If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

7 If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:
http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:
https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

8 If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

9 If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

If you have questions regarding these comments, please contact me at (916) 464-4684 or Peter.Minkel2@waterboards.ca.gov.

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

CALIFORNIA STATE LANDS COMMISSION

100 Howe Avenue, Suite 100-South
Sacramento, CA 95825-8202



Established in 1938

JENNIFER LUCCHESI, Executive Officer
(916) 574-1800

TTY CA Relay Service: **711** or Phone **800.735.2922**
from Voice Phone **800.735.2929**
or for Spanish **800.855.3000**

Contact Phone: (916) 574-1890

January 30, 2024

File Ref: SCH #2005072046

Flood Projects Branch
Department of Water Resources
3464 El Camino Avenue Room 200
Sacramento, CA 95821

VIA ELECTRONIC MAIL ONLY: PublicCommentARCF16@water.ca.gov

**Subject: Draft Subsequent Environmental Impact Statement/Environmental
Impact Report for the American River Common Features, Water
Resources Development Act of 2016**

To whom it may concern:

The California State Lands Commission (Commission) staff has reviewed the Draft Subsequent Environmental Impact Statement/Environmental Impact Report (SEIS/EIR) for the American River Common Features (ARCF), Water Resources Development Act of 2016 (Project), which is being prepared by the Central Valley Flood Protection Board (CVFPB), as the lead agency under the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.), and the U.S. Army Corps of Engineers (USACE) as the lead agency under the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.). The Commission is a trustee agency for projects that could directly or indirectly affect State sovereign land and their accompanying Public Trust resources or uses. Additionally, because the Project involves work on State sovereign land, the Commission will act as a responsible agency.

Commission Jurisdiction and Public Trust Lands

The Commission has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The Commission also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions (Pub. Resources Code, §§ 6009, subd. (c); 6009.1; 6301; 6306). All tidelands and submerged lands granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust Doctrine.

As general background, the State of California acquired sovereign ownership of all tidelands and submerged lands and beds of navigable lakes and waterways upon its admission to the United States in 1850. The State holds these lands for the benefit of all people of the State for statewide Public Trust purposes, which include but are not limited to waterborne commerce, navigation, fisheries, water-related recreation, habitat preservation, and open space. On tidal waterways, the State's sovereign fee ownership extends landward to the mean high tide line (MHTL), except for areas of fill or artificial accretion or where the boundary has been fixed by agreement or a court.

1 The American and Sacramento Rivers, at several of the locations within the proposed Project, are tidal State sovereign land under the jurisdiction of the Commission. Based upon the information provided and a preliminary review of Commission records, Commission staff has determined that the Project will require submission of a lease application(s) for issuance of a lease(s). The application can be found at our website at www.slc.ca.gov. As the Project proceeds, please submit additional information, including but not limited to MHTL and boundary surveys, for a determination of the extent of the Commission's jurisdiction. Please contact Ninette Lee, Public Land Manager, for jurisdiction and leasing requirements for the Project (see contact information at end of letter). Additionally, please ensure that Ninette is included on any future distribution mailing list for the Project.

Proposed Project Description

The SEIS/EIR analyzes design refinements to the authorized ARCF 2016 Project, including engineering design modifications, footprint expansions, and compensatory habitat mitigation approaches. The design refinements include actions within eight major project components:

- American River Erosion Contracts 3B, 4A, and 4B
- Sacramento River Erosion Contract 3
- Magpie Creek Project (MCP)
- American River Mitigation Site (ARMS)
- Sacramento River Mitigation Site (SRMS)
- Installation of a Piezometer Network

2 It is staff's understanding that areas within the American River Erosion Contracts 3B, 4A, and 4B, Sacramento River Erosion Contract 3, and portions of the ARMS and SRMS are within the jurisdiction of the Commission.

3 The Proposed Action (Alternative 2) would have the fewest overall environmental impacts, as well as the least environmentally damaging impacts, and therefore would be the environmentally superior alternative under CEQA.

Comments

4

Thank you for the opportunity to review the SEIS/EIR for the Project. As a responsible and trustee agency, the Commission will need to rely on the certified SEIR for the issuance of any lease as specified above and, therefore, we request that you consider our comments prior to certification of the SEIR. Staff would also like to thank CVFPB and the USACE for the inclusion of the ordinary high-water mark on many of the SEIR maps, which assists Staff with our jurisdictional determination and assessment of project impacts that would occur on State lands.

5

Please send copies of future project-related documents, including electronic copies of the certified SEIS/EIR, an accessible version of the final Mitigation Monitoring and Reporting Program, Notice of Determination, Findings, Statement of Overriding Considerations (if applicable), and approving resolution when they become available. Please refer questions concerning environmental review to Cynthia Herzog, Senior Environmental Scientist, at (916) 574-1310 or cynthia.herzog@slc.ca.gov. For questions concerning Commission leasing jurisdiction, please contact Ninette Lee, Public Land Manager, at (916) 574-1869 or ninette.lee@slc.ca.gov.

Sincerely,



Nicole Dobroski, Chief
Division of Environmental Science, Planning,
and Management

cc: Office of Planning and Research
C. Herzog, Commission
N. Lee, Commission
J. Fabel, Commission

Transportation Division

City Hall
915 I Street, 2nd Floor
Sacramento, CA 95814-2604
(916) 808-5307

February 23, 2024

U.S. Army Corps of Engineers, Public Affairs Office
Attn: ARCF SEIS/SEIR
1325 J Street, Room 1513
Sacramento, CA 95814
Email: ARCF_SEIS@usace.army.mil, PublicCommentARCF16@water.ca.gov

SUBJECT: American River Common Features (ARCF) SEIS/SEIR

Thank you for including the City of Sacramento in the environmental review process for the project referenced above.

The City of Sacramento Department of Public Works has the following comments on the project:

1. Proposed Haul Routes should include the requirement that safe pedestrian and bicyclist access be maintained around construction areas. The proposed project should provide detours to maintain safe pedestrian and bicyclist access around the construction areas at all times. Access should be ensured for pedestrians and bicycle trails be maintained including:
 - a. Provision of driveway access control between levees and City roadways so that pedestrian and bicycle movements are maintained.
 - b. Clear rerouting of pedestrian and bicycle trails and installation of signage for traffic and alternative transportation routes.
 - c. Early notification to affected neighborhoods.
 - d. Early coordination with the City's Active Transportation Commission. Please contact Jennifer Donlon Wyant, Transportation Planning Manager, City of Sacramento, Department of Public Works, Transportation Division, JDonlonWyant@cityofsacramento.org
2. Haul routes are proposed on some smaller roads inside City of Sacramento limits. Documentation should include a pavement assessment before and after to document damages to pavement.
3. The construction Contractor must provide a construction traffic control plan per City Code 12.20.030 to the satisfaction of the City Traffic Engineer.

The plan shall ensure that acceptable operating conditions on local roadways and freeway facilities are maintained. At a minimum, the plan shall include:

- The number of truck trips, time, and day of street closures.
- Time of day of arrival and departure of trucks.
- Limitations on the size and type of trucks, provision of a staging area with a limitation on the number of trucks that can be waiting.
- Provision of a truck circulation pattern.
- Maintain safe and efficient access routes for emergency vehicles.
- Manual traffic control when necessary.
- Proper advance warning and posted signage concerning street closures.
- Provisions for pedestrian safety.

A copy of the construction traffic management plan shall be submitted to local emergency response agencies and these agencies shall be notified at least 14 days before the commencement of construction that would partially or fully obstruct roadways.

Please provide our office with copies of any further actions regarding this project.

If you have any questions regarding these comments, please contact me at (916) 808-8930 or by email at pclarke@cityofsacramento.org

Sincerely,

Pelle Clarke, PE
Senior Engineer
City of Sacramento
Department of Public Works, Traffic Engineering

MISSION OAKS-1

From: Sutton, Drew
Sent: Tuesday, February 27, 2024 9:10 AM
To: Dorff, Becky
Subject: FW: Oak Meadow Park

From: Tibbitts, Dan <TibbittsD@saccounty.gov>
Sent: Tuesday, February 13, 2024 12:42 PM
To: Sutton, Drew <dsutton@geiconsultants.com>
Subject: [EXT] FW: Oak Meadow Park

From: Daniel Barton <dbarton@morpd.com>
Sent: Tuesday, February 13, 2024 11:56 AM
To: William.Polk@usace.army.mil
Cc: Tibbitts, Dan <TibbittsD@saccounty.gov>; bgualco@gualco.com; Patricia Todd-Brown <Seat3@morpd.com>; Chair <Chair@morpd.com>
Subject: Oak Meadow Park

EXTERNAL EMAIL: If unknown sender, do not click links/attachments. If you have concerns about this email, please report it via the Phish Alert button.

1 | My name is Daniel Barton the District Administrator of Mission Oaks Recreation & Parks District. I would like to point out that permission is not granted to use Oak Meadow Park for staging area. Please remove all of Oak Meadow and any and all MORPD Parks from your ACOE project. We were contacted a few months ago by phone asking if we would want to participate and we declined. A few examples are:

American River Erosion Contract 3B North

Site 3-1

Staging for Site 3-1 would occur at University Park, within the American River Parkway just south of the University Park, and Oak Meadow Park (Figure 3.5.2.6). The staging area at Oak Meadow Park would also be used for stockpiling if necessary. Haul route access would go through University Park to the parking lot just north of University Park. Up to seven trees would likely need to be removed for access. In addition, trucks would access the work areas Oak Meadow Park from the Kadema River Access location to American River Drive. This access point would reduce the number of trips through the neighborhood. Both University Park and Oak Meadow Park would be closed during construction. Finally, Wilhaggin Drainage Pump Station could be used for Site 3-1 staging.

See Figure 3.5.2-3 showing all of Oak Meadow as staging.

See Table 3.5.2-12.

Appendix B, p. 2.2-2, 12

2.2-15

NEPA Impact Conclusion (Design Refinements): Short-term to Medium-Term and Moderate to Major effects that are Less than Significant

Portions of the American River Parkway would be closed for both American River Erosion Contract 3B North, 3B South and 4A. Several local parks near the American River Erosion Contract 3B North and South sites and American River Erosion Contract 4B would be closed during construction. Oak Meadow Park (5.5 acres) and Glenbrook Park River Access (3.5 acres) would have complete closures during construction. Larchmont Community Park and University Park would have partial closures during construction (Figure 2.2-1). Approximately 3 acres of University Park would be closed, and 7.5 acres of Larchmont Community Park would be closed (Figure 2.2-1).

2.2-22

Many staging areas for American River Erosion Contract 3B North and South and American River Erosion Contract 4B are public parks or recreational areas. Specifically, Oak Meadow Park, University Park, Waterton Way River Access, Larchmont Community Park and Glenbrook Park River Access would be used for staging. Some minor tree removal may be required for use of these parks as staging areas and for general access. As part of the real estate process to get access to use parks for the Proposed Action, consultation would occur with the City of Sacramento, Sacramento County, Cordova Recreation and Park District or Mission Oaks Recreation and Park District prior to removal of any tree. Any trees or vegetation that might

be removed in the parks would be replanted in consultation with City of Sacramento Department of Parks and Recreation, Sacramento County Department of Regional Parks, Cordova Recreation and Park District or Mission Oaks Recreation and Park District.

Best regards,



Daniel Barton
District Administrator
Mission Oaks Recreation & Park District
(916) 359-1600
MORPD.com

PARKS-1

Mr. Guy Romine
Attn: Environmental Analysis Section (CESPK-PDR-A)
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814

Mr. Josh Brown
Central Valley Flood Protection Board/California Department of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, CA 95281

Subject: Public Comment Period for the Draft Supplemental Environmental
Impact Statement/Subsequent Environmental Impact Report 2016 American River Watershed Common
Features Project

Dear Mr. Romine,

The Sacramento County Department of Regional Parks (Regional Parks) received the notice of availability of the Draft Supplemental Environmental Impact Statement / Subsequent environmental Impact Report (SEIS/SEIR) indicating a 45-day public review period, which began on December 22, 2023, and is set to close on February 5, 2024.

1 Regional Parks is respectfully asking for an extension to the review period to account for the lost days associated with the traditional year-end holiday season when many people take vacations and to allow us the ability to thoroughly review the analyses that have gone into all the proposed work within the American River Parkway (i.e., Urrutia Mitigation Site, Contract 3B and Contract 4).

As we indicated in our comment letter dated December 30, 2022, on the Notice of Intent to prepare the SEIS/SEIR Regional Parks is responsible for ensuring that proposed projects are designed to first, avoid adverse environmental impacts; second, minimize adverse environmental impacts; and third, replace, repair, or restore adversely impacted resources as close as feasible in time and place to the impact. All planning activities and projects in the Parkway must be consistent with the goals and policies of the Parkway Plan and Regional Parks is responsible for conducting consistency determinations.

In addition, for any physical change, which involves a modification to an existing Area Plan or Area Plan policy, is subject to a public hearing process and ultimately requires approval by the County Board of Supervisors and consideration of approval is contingent on adequate compliance with the California Environmental Quality Act (i.e., the subject SEIS/SEIR). There are several aspects of the proposed work within the American River Parkway that would be required to go through this process (e.g., Urrutia mitigation site and trail realignments). As such it is critical that Regional Parks is allowed an adequate amount of time to review the analysis provided in the SEIS/SEIR to ensure that the SEIR adequately addresses and analyzes the impacts as a Responsible Agency.

A 45-day review period, which includes weekends, would be difficult under normal circumstances with a SEIS/SEIR that is over 1,700 pages in length but the fact that these documents are supplemental and subsequent requires additional time to reference material provided in the original EIS/EIR for the project. Since the review period for the subject document was issued right at the start of the year-end

holiday season, we have already lost about 11-days of review time and with the weekends the total time lost is 21-days, giving us a total of 24 days to review. This is equivalent to about 74 pages per day or 2-3 hours per day on top of other obligations. We are respectfully asking that the public review period be extended to February 19th so that we can adequately review the SEIS/SEIR (equivalent to 52 pages per day or 1-2 hours per day).

Regional Parks understands the need to balance project timelines but as a Responsible Agency under CEQA, Regional Parks has an obligation to make informed and balanced decisions under our scope of jurisdiction. We look forward to more engagement, coordination, and collaboration for all efforts inside the American River Parkway.

Sincerely,

Liz Bellas

Director of Regional Parks

cc:

Josh Brown, California Department of Water Resources

Susan Rosebrough, National Parks Service

Pete Ghelfi, Sacramento Area Flood Control Agency

**Regional Parks Department**

Liz Bellas
Director

Divisions

Administrative Services
Park Maintenance
Recreation Services
Rangers
Planning/Development

County of Sacramento

February 23, 2024

Mr. Guy Romine
Attn: Environmental Analysis Section (CESPK-PDR-A)
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814

Mr. Josh Brown
Central Valley Flood Protection Board/California Department of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, CA 95281

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

Mr. Romine and Mr. Brown,

On December 22, 2023, the U.S Army Corps of Engineers (USACE) and the Central Valley Flood Protection Board (CVFPB) published the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) for the 2016 American River Watershed Common Features Project (ARCF), Sacramento CA. The Sacramento County Department of Regional Parks (Regional Parks) appreciates that the USACE and CVFPB extended the public review period to February 23, 2024. As a Responsible Agency we also appreciate the opportunity to review the SEIS/SEIR particularly as it relates to the proposed actions within the American River Parkway.

intro

As previously established in the letter that Regional Parks submitted on December 31, 2022, during the scoping period under the National Environmental Protection Act (NEPA), the American River Parkway (Parkway) from Nimbus Dam to the confluence with the Sacramento River is a designated Wild and Scenic River and the management and protection of the wild and scenic river values as outlined in the American River Parkway Plan (ARPP) is the principal responsibility of Regional Parks. Projects within the Parkway must be reviewed by Regional Parks for consistency with the ARPP as part of the approval process. As such our review of the SEIS/SEIR focuses on ensuring

that appropriate alternatives were considered and analyzed, that the environmental analysis is adequate, and that the significant direct and indirect impacts within the Parkway are avoided and/or minimized to the extent feasible in relation to the actions proposed at Contracts 3B North and South, 4B, and the American River Mitigation Site (which we will refer to as the Urrutia Site as it is identified in the ARPP). We begin with our comments related to the overall joint document and the associated process.

Overall Document Outline and Approach

The NEPA and California Environmental Quality Act (CEQA): Integrating Federal and State Environmental Reviews (OPR 2014) states that “At the scoping level, public involvement is encouraged to help identify impacts and alternatives regarding the proposed project as well as any existing studies or information that can be used during the NEPA review.” The scoping for the SEIS/SEIR document was inadequate. The USACE failed to engage Regional Parks during the NEPA scoping process and the development of alternatives. The CVFPB failed to initiate a scoping process under CEQA and is apparently relying on the scoping that was done for the original 2015 ARCF General Reevaluation Report (GRR) EIR, nearly a decade ago.

The OPR 2014 handbook provides practical suggestions on preparing a joint document to facilitate interagency cooperation, to improve efficiency, and avoid redundancy that ultimately facilitates public review of a document that includes subtle differences between CEQA and NEPA. Unfortunately, the joint SEIS/SEIR as prepared by the project partners does not model the original 2016 ARCF GRR EIS/EIR or other joint documents that have been prepared in the past, which more closely followed the OPR 2014 guidelines. The current document suggests there was a lack of interagency cooperation particularly associated with the alternatives that are falsely rejected by the NEPA lead but carried forward under CEQA. Not only is this a truly disingenuous approach but it is also extremely confusing. Additionally, it is not clear in the document why there is a separate "detailed analysis" provided in Appendix B, which duplicates much of the same information provided in the main text. Nor is it clear why Appendix B immediately follows the main document instead of Appendix A or why Appendix B begins with section 2 instead of section 1. The fundamental outline of the document is extremely confusing, does not lend itself to a straightforward analysis or disclosure of the environmental impacts, and appears to be inadequate for a Lead or Responsible agency to make a truly informed decision.

Aside from the missteps associated with public scoping and the overall document outline the information provided in the document about the alternatives is like an easter egg hunt where some information is found within the text and other important details are only later discovered in various tables. Compounding this is the numbering system that is provided for the various alternatives, which not only overlap with project contract numbers (e.g., Contract 4A versus Alternative 4A for Urrutia) but are also different from the document text to the tables (e.g., Alternative 2 is identified as the “proposed action” in the text but the summary table lists it as Alternative 6). It is unreasonable to assume that decision makers or the public would be able to untangle these errors or to assume that anyone would be able to conclude that the analysis presented is adequate when the document is riddled with fundamental issues and errors.

American River Erosion Contracts 3B North, 3B South and 4B

Due to the addition of the proposed Contract 4B measures, which occur in the reaches of Contract 3B North and the Contract 3B South there needs to be a re-evaluation of all the erosion control measures being proposed to ensure that the impacts to the Parkway are being minimized and/or avoided per ARPP Policy 4.10. This issue and other issues or comments we identify for each of these contracts follow:

Section 3.3 – Alternatives Development and Screening

Overall, a reasonable range of alternatives has not been considered for Contract 3B North, 3B South, or Contract 4B. Additionally, there needs to be an alternative or two that addresses the issues holistically. Specifically, the overlap and piecemeal approach by adding Contract 4B to the areas addressed under Contracts 3B North and 3B South needs to be analyzed and addressed to ensure environmental and recreational impacts are not greater than necessary. Currently, Regional Parks understands that the trail impacts associated with Contract 3B North and 3B South is anticipated to occur over a two-year period but by going back to these same areas under Contract 4B these recreational impacts are actually greater. The SEIS/SEIR does not address other short- and long-term impacts, nor provide less impactful alternatives, for other recreational activities, such as loss of fishing access, use of small watercraft, wading and swimming access, and aesthetics despite the Lower American River being given the designation of Wild and Scenic based on its extraordinary values of its recreation and anadromous fishery. Additionally, this topic needs to be brought to the Technical Resource Advisory Committee (TRAC) and the Bank Protection Working Group (BPWG).

Section 3.3.2 discusses Contract 3B North alternatives that were considered but rejected from further analysis. The alternatives discussed were inadequate and/or incomplete:

- The alternative to remove the island upstream of Howe Avenue to increase hydraulic capacity to allow for placement of bank protection fails to address the alternatives considered for bank protection and only speaks to the ability to place bank protection in the area downstream of the existing bank protection site (referred to as Site 5). The discussion provided only highlights a component of what was considered and does not provide detailed information about what the designs for bank protection would be along the entire 3B North reach in relation to Island removal and how it is different than other alternatives.
- The alternative discussed to place soil-filled revetment on the slope of existing Site 5 addresses a small portion of the Contract 3B North site and does not provide detailed information about what the designs for bank protection would be along the entire 3B North reach. The discussion provided is not a comprehensive alternative to the bank protection design refinements that are proposed upstream and downstream of Site 5. The text states “alternative erosion protection methods were selected to reduce impacts to heritage oaks” instead of placing the soil-filled revetment along the slope at Site 5 but no details are provided about the alternative methods to be employed or even the location of the oaks to be protected. There is no discussion of why the revetment on the back slope at Site 5 was not needed or if there is a correlation between this discussion and island removal or the proposed cutbank on the opposite side of the river. This alternative is not included in the summary table.

- The alternative discussed to grade the opposite riverbank to address hydraulic impacts and improve habitat was rejected for impacts to VELB. No details are provided about how this would affect the bank protection design on the opposite bank or how it may or may not be connected to island removal.
- The alternatives analyzed are incomplete and inadequate. It is critical that alternatives are developed in coordination with the TRAC that considers a comprehensive approach to addressing Contract 3B North with Contract 4B. The piecemeal approach is unacceptable as it likely results in greater environmental and recreational impacts.

Section 3.3.2 indicates that one alternative was considered but rejected for Contract 3B South. No information is provided about the alternative considered, so it is unknown if this alternative is more or less favorable than what is being proposed. It is critical that alternatives are developed in coordination with the TRAC that considers a comprehensive approach to addressing Contract 3B South with Contract 4B. The piecemeal approach is unacceptable as it likely results in greater environmental impacts.

Section 3.3.2 does not discuss or present any alternatives for Contract 4B. As noted previously, this needs to be considered in conjunction with Contracts 3B North and 3B South. The TRAC needs to be engaged in this process. The current piecemeal approach between Contracts 3B North, 3B South, and Contract 4B is unacceptable as it likely results in greater environmental and recreational impacts.

Section 3.5 – Alternative 2: Proposed Action

More information needs to be provided for agencies and the public to determine project impacts. Basic information for Contracts 3B North, 3B South, and 4B is not clearly shown or defined.

Contract 3B North and 3B South Proposed Actions:

- There are schematics shown for launchable trench and bank protection designs in Figure 3.5.2-2. The launchable rock toe protection and rock tiebacks should be shown in this figure as well for people to understand the design and the impacts it may have. The label “SWIF” on this figure is not defined, and it is unclear to the reader what activity would occur in this area.
- Section 3.5.2 does not provide the acreages or linear footage for each type of erosion control measure. The Figures in these sections (3.5.2-1, 3.5.2-3, 3.5.2-5, 3.5.2-6, 3.5.2-7, 3.5.2-8, 3.4.2-9, and 3.5.2-10) should explicitly show polygons with associated acreages and lines with associated linear footage for each erosion control type (soil-filled revetment, launchable toe rock, launchable trench, tiebacks, bank protection) and the planting bench areas to define the project actions and analyze impacts.
- Figures 3.5.2-3 and 3.5.2-6 show the project footprint, including the construction buffer, access, and staging areas. A description of the activities that would occur in each area is absent from the written project description and the features of the proposed action and construction details described in Section 3.5.2.1. The location of trees to be removed or that occur along the haul routes is needed to understand impacts to vegetation and wildlife habitat, and the potential for trees to suffer a slow decline due to long-term impacts from trunk and root damage and soil compaction. An ISA certified arborist should be involved in the planning, design, and

construction process to ensure that best management practices are implemented and impacts on trees retained post-project are minimized. The large areas shown for construction buffers and construction access are alarming without an understanding of what is occurring in these areas.

- Site 3-1 has a launchable rock toe with rock tiebacks and a launchable trench in the downstream reach. Site 4-2 has a launchable trench with a rockered levee slope (per Figure 3.5.2-2). Site 4-1 has a launchable trench with a rockered levee slope, rock toe, and rock tie backs. Areas where rock placement would occur on the slopes is not identified other than in the general schematic shown in Figure 3.5.2-2. Site-specific plans should be shown to identify the location and placement of each protection type for a proper impact analysis. No project alternatives were presented for Sites 3-1, 4-1, or 4-2, and when considered in conjunction with what is proposed for Contract 4B, this is unacceptable. There is an alarming amount of rock being placed at these sites which will result in long-term loss of shoreline and bank habitat and impose safety concerns for humans and wildlife accessing the river.
- “Launchable toe is typically designed with bank protection further up the riverbank slope”. It is indicated that rock on the slope behind the toe protection is “typical,” but this is not typical in this reach, such as at Site 5 where the backslope was not rockered (except for a small segment at the upstream end) and the woody vegetation has successfully stabilized the backslope. Site 5 was designed this way to minimize impacts to existing vegetation and has been successful. It is not identified in the document where or how much rock would be placed on slopes. This statement is presented as a topic sentence, but the discussion that follows is related to the vegetation free zone (VFZs) instead of supporting the topic sentence.
- The statement in Section 3.5.2 that “launchable rock would be filled with choke stone fill... to reduce the artificial appearance of launchable rock.” This façade is not likely to soften the appearance of the rockered bank, nor make it safer or more accessible for recreational purposes. Choke stone (i.e., cobble) in rock would fill voids in the large angular rock but the final appearance will be a rock-in-rock slope that is devoid of vegetation and SRA habitat for aquatic and terrestrial species. This would permanently impact the habitat, aesthetics, and recreational access to and from the river by completely converting the vegetated shorelines to an unplatable rockered bank line. It is also not indicated how long this choke stone would persist based on anticipated velocities during high water events or if it would be replaced.
- Section 3.5.2 fails to disclose details about the layer of choke stone (i.e., cobble) that would be placed on top of the soil bench instead of the coir fabric which was successfully used to prevent loss of soil along Contract 1 and Contract 2. Lessons learned from past bank protection within the American River have shown that plants struggle to establish, have slower growth rates with a layer of cobble on the surface, and natural recruitment is limited over the long-term as a result of the cobble layer. Redevelopment of the riparian forest’s structure is going to take decades. Until the vegetation reestablishes, the wildlife habitat and associated recreational values would be impacted since many species may not return to the area until the forest matures. Lining the soil surface with choke stone, or cobble, will slow growth and reduce or prevent recruitment, delaying and permanently impacting the natural ecosystem processes. This information was discussed in the TRAC and was also included in the “Evaluation of Bank Protection Sites on the Lower American and Sacramento Rivers: Recommendations for Design and Management” a report that was also presented and shared with the TRAC early in the process to help inform bank

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protection designs. In addition, cobble is not easy to walk on and would affect recreational access and public safety.

- Contract 3B North and potentially 4B will cause temporary impacts to the Jedidiah Smith Memorial Bike Trail but the SEIS/SEIR does not discuss the formally designated horse trail, which would be permanently impacted by the proposed action.

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- Instream Woody Material (IWM) would be included along the shoreline to create habitat for fish species. IWM is only a temporary habitat feature that will degrade and does not provide a sustainable habitat solution. A sustainable solution would include planting the shoreline (in and around the IWM) with cuttings or plantings of California buttonbush or willows would provide SRA habitat long-term after the IWM degrades. There is no discussion about the associated impact for replacing IWM as it degrades, is vandalized, or washed downstream, or the anchoring system that would be used for IWM or associated long-term management. Chains and cables used for anchoring pose a safety hazard and are often abandoned and left behind rather than being removed once the IWM system has degraded and monitoring is signed off. The anchoring of IWM installed for Contract 2 (Site 2-3) included the use of chains instead of the natural rope material that biodegrades in time that had originally been proposed and discussed in TRAC. This is an unacceptable anchoring system for the Parkway and should not be utilized for Contract 3B North or 3B South in order to protect wildlife; prevent entanglement of humans, wildlife, and domestic species; protect aesthetics; and reduce safety hazards. Preparation of a long-term management plan for the habitat features at each of the erosion sites, including details about IWM management, and these management plans need to be prepared in coordination with Regional Parks.
- “There would be no woody vegetation or trees planted in the vegetation free zone (VFZ), which, on the water side of the levee, extends approximately 15 feet from the levee toe. The VFZ would be reseeded with native grasses.” *It is not explicitly stated why a VFZ would exist and its purpose since woody vegetation would be removed in this area, why wouldn’t it be replaced? A plan view graphic showing where this is applicable along Site 3-1 needs to be provided and include an explanation as to why a VFZ would exist.*
- “Generally, trees would be removed prior to migratory bird nesting season (generally February 15 to August 31, depending on the species and environmental conditions for any given year) to avoid impacts under the Migratory Bird Treaty Act; however, trees may need to be removed during nesting season if there is a large snowpack season with high water surface elevations through spring and early summer that make the trees inaccessible through June.” *The high-water surface elevations that could result through the spring and early summer would occur during the breeding season. During fall-early winter flows are typically low so woody vegetation removal would not be impacted by high water surface elevations. However, if there are conditions during the non-nesting season that would delay vegetation removal into the nesting season then experienced biologists, approved by USFWS and CDFW, should conduct nesting bird surveys within 24-hours of planned vegetation removal. If/when nests are found buffers should be established in coordination with USFWS and CDFW. Further it is critical to note that the mitigation measure should apply to all woody vegetation since nesting does not just occur in trees.*

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- A launchable trench is proposed for Site 4-2, but the details associated with the trench are unclear. The SEIS/SEIR states that “the launchable trench would be buried to provide soil above the revetment to allow vegetation to reestablish. In addition, as described for Site 3-1, the bank protection would consist of soil filled revetment.” *The document states the soil-filled revetment would be buried and covered with soil, but the dimensions and depth of soil cover are extremely important for establishing vegetation with robust growth. If inadequate soil volume is provided, vegetation will be stunted, unhealthy and will not be a true “replacement” to “mitigate” the loss of large, healthy, woody vegetation that the project would be removing. Furthermore, there is no mention of whether the “reestablishment of vegetation” includes woody species or grasses. This needs to be described and species need to be identified. It is also important that mitigation for woody species be “in-kind” to ensure mitigation is appropriate, for example replacing a large heritage oak tree with willow species would not truly mitigate the impact. It is important to understand if woody species are being planted onsite and if these trees/shrubs would be considered mitigation or a biotechnical feature similar to the woody thickets planted on rock trenches adjacent to the proposed actions. If woody vegetation is not being replanted an explanation is needed. The impacts to vegetation and habitat long-term cannot be appropriately evaluated without specific design details.*
- The document repeatedly uses the term “as with...” and refers to the other sites as if their designs are comparably similar, but they are not. A buried launchable trench and a launchable rock toe with planting trench can provide very different habitat quality and type depending on the design-specific construction details, which are not provided in this document. For example, the launchable rock toe design tends to produce sites with little to no SRA habitat value on the bank and shoreline unless it is constructed in a way to allow for emergent vegetation to establish on the shoreline and within the rock. The planting benches (depending on their dimensions and the relationship to the water surface elevation) tend to provide riparian habitat. This is possibly the opposite of what you would expect to see with a launchable trench design that has an intact (i.e., not rocked) shoreline. The differences in the design elements must be addressed as they affect the habitat differently and cannot be overlooked.
- Staging areas for Site 3-1 in Section 3.5 identifies Oak Meadow Park located between American River Drive and Kadema Drive as a potential staging area for stockpiling. This staging option has not been discussed with the Mission Oaks Recreation and Parks District and is currently not an option. The project partners need to reach out to this park district to discuss the proposal to stage in this park.

Contract 4B Proposed Actions:

- The information provided regarding Contract 4B is inadequate for an impact analysis. The proposed project has not been developed enough for a CEQA or NEPA analysis. The potential impacts to irreplaceable heritage trees and other native vegetation cannot be evaluated based on a lack of information including the following: conceptual designs (at minimum); acreage of the site(s); an arborist tree inventory (species, diameter size, GPS location, and health, structure, and overall condition ratings for each tree within the project boundaries. Please refer to <https://planning.saccounty.gov/LandUseRegulationDocuments/Documents/General-Plan/Arborist%20Report%20Submittal%20Requirements.pdf> for additional information on Sacramento County Arborist Report Submittal Requirements and coordinate with Sacramento

17 | County Regional Parks). Locations of trees to be removed or that occur along the haul route are needed to understand potential long-term impacts on retained trees.

- Section 3.5.2.1.1 states “there are only conceptual designs in place for this work” but these designs are not provided in the document nor are they described in detail. Therefore, Contract 4B cannot be properly evaluated for impacts.
- Section 3.5.2.1.1 fails to thoroughly describe the velocity and scour issues and the specific area of concern, as well as what trees would be impacted. The figures to support this section (Figures 3.5.2-11 and 3.5.2-12) are missing from the document and the section states that placed revetment would be similar to Figure 3.5.2-2, except it is unclear which schematic in that figure the text is referring to because it is not explicitly stated. While the USACE posted Figures 3.5.2-11 and 3.5.2-12 to the Sacramento Levee Upgrades webpage in response to a public comment received, these figures were uploaded on February 16, 2024. However, there were problems accessing these files on both February 17 and February 18 as “403: Access Forbidden” error messages were encountered. It is unreasonable to include these Figures without noticing Responsible Agencies and members of the public. There is not adequate information to understand the impacts of Contract 4B in the current SEIS/SEIR, nor has the document provided sufficient detail and rather has stated that “Three different activities would be undertaken within the proposed footprint (Figure 3.5.2-11 and Figure 3.5.2-12).” It is unclear what “activities” are represented on Figure 3.5.2-11 and Figure 3.5.2-12 that were uploaded to the project website on February 16, 2024. Further, NEPA analyzes “actions” undertaken by Federal agencies and CEQA analyzes a “project.” The use of the term activities should at least be clarified to be associated with “construction activities.” It is not feasible to comment in a meaningful manner with the paucity of written descriptive information and the absence of Figure 3.5.2-11 and Figure 3.5.2-12 for 55 days.

Additionally, the section states that “smaller revetment gradations around tree trunks” would be placed.

- Placing stone around tree trunks is an unhealthy practice and has several negative impacts on vegetation: the grade change around existing trees should not exceed 4 to 6 inches; and fill or rock should remain far from the tree’s trunk because it can reduce oxygen diffusion, increase compaction, cause rot, decay, and long-term decline or failure of the tree.

The document states that “About 2 feet of soil-filled revetment would be installed. This also may require about 5 feet of excavation below the surface of the ground [...]” and “Some trees may not survive the excavation.”

- A complete tree inventory should be completed by an ISA certified arborist and used to inform designs to reduce tree impacts. Please note that the Sacramento County Arborist Report Submittal Requirements size threshold for inclusion is 4 inches in diameter. Regional Parks request that the USACE and project partners coordinate with Regional Parks staff in advance of the undertaking tree inventory field data collection. It is important to acknowledge that the California Department of Fish and Wildlife regulates trees 2-inches in diameter per Lake and

Streambed Alteration Agreement revised instructions dated September 1, 2021. While we recognize that as a Federal entity, USACE is exempt from obtaining a LSAA for this project, as a Responsible agency we are interested in obtaining a full inventory of trees removed from the project footprint so that we ensure that the functions and values being lost as a result of project implementation are fully mitigated.

- To minimize tree impacts to trees remaining on the landscape post-construction, a calculated tree protection zones\ (TPZ) should be established by an ISA certified arborist for all existing trees that in, and adjacent to, the project footprint and haul routes that would be retained post-construction. A calculated TPZ is a tree protection zone that is calculated using the trunk diameter and a multiplication factor based on the species' tolerance to construction and the age of the tree. A tree protection zone is an area within which certain activities are prohibited or restricted to present or minimize potential injury to trees, especially during construction. The TPZ, at minimum, should encompass the critical root zone (CRZ) which is the area of soil around the tree where the minimum amount of roots considered to be the health or structural stability of the tree are located. The CRZ, TPZ, and calculated TPZ should be established following the Managing Trees During Site Development and Construction (Matheny et al. 2023) best management practices.
- A tree preservation plan should be developed by an ISA certified arborist and submitted to Regional Parks for review and approval prior to the start of construction. The tree preservation plan should include best management practices for protecting trees as described in Managing Trees During Site Development and Construction (Matheny et al. 2023) and ANSI A300 standards for tree protection during construction, pruning, and root management (and others as applicable). Trees should be monitored during construction by an ISA certified arborist and Regional Parks should be provided with regular updates.

Matheny, Nelda, ET Simley, R Gilpin, R Hauer. 2023. Managing Trees During Site Development and Construction. 3rd Edition. Best Management Practices. International Society of Arboriculture. Atlanta, GA.

Contract 4B project footprint overlaps with Site 3-1 and Site 4-1 of Contract 3B. The SEIS/SEIR indicates that the schedule is more important than combining Contract 4B efforts with the work to be done under Contract 3B North and 3B South).

- The project is being rushed to meet the USACE's schedule, which results in increased cost, increased permanent and temporary impacts to the outstanding and remarkable values of the Parkway through loss of vegetation and habitat, multi-year closure of Parkway trails, as well as impacts associated with increased greenhouse gas emissions, and increased noise disturbance, all of which negatively impacts aesthetics and recreational use. Revaluation of Contract 4B in conjunction with a reevaluation of 3B North and South is critical to ensure impacts are minimized.

The piecemeal approach is unacceptable as it likely results in greater impacts within the Parkway. The TRAC needs to be reengaged to ensure that the proposed bank protection associated with Contracts 3B North and 3B South make sense in light of the concern that the project partners now have related to the tree issue that would be addressed in Contract 4B.

- Furthermore, the ARCF GRR (pages 4-7 and 4-8) describes the intent of the USACE coordinating with locals (i.e., the BPWG, Lower American River Task Force, etc.) to implement bank protection in an as environmentally friendly way as possible. This is particularly important because the velocity and tree scour issues associated with Contract 4B were never discussed as an issue in the TRAC which was established by the BPWG. The BPWG was formed in 1998 particularly for this purpose. Furthermore, the concepts for Contract 3B North and South, which were preferred by the TRAC, and carried forward as the proposed design, were chosen as a result of considering all of the resources within each reach and protection of resources to the greatest extent feasible. Discussions in the TRAC did include a discussion of these trees and are a factor in the reason the TRAC preferred a version of the current designs for Contract 3B North and South. The Contract 4B work cannot be carried forward without reconsidering the Contract 3B North and South designs to ensure the bank protection work is appropriately and reasonably designed to reduce impacts and protect resources in each reach (which was a goal of the TRAC).
- Contract 3B and Contract 4B would not be constructed in the same construction season. The SEIS/SEIR notes that the design for Contract 3B was “already far along, it was too late to add the additional work” (p.3-41) of Contract 4B into Contract 3B. Since both contracts are associated with erosion and are located in the same physical footprint, a holistic engineering solution should be applied in an effort to reduce impacts to trees, wildlife, and recreation. The recreational impacts could span several years but also could be lessened if the projects were better planned with each other in a consolidated way rather than piecemealing.

Appendix B

For the American River Erosion Contract 3B (North and South) and Contract 4B the document states “The Proposed Action will result in substantial tree removal to construct levee improvements. To limit the number of trees removed, each tree will be inspected and kept in place when feasible.”

- A qualified ISA certified arborist should be involved with this process as they can assist in the planning, construction, and post-construction monitoring of trees. “When feasible” should be defined to the Responsible Agencies with decision-making authority and to members of the public. An ISA certified arborist is essential for establishing the calculated TPZ and developing the tree protection plan. Incorporating an ISA certified arborist into the project planning, design, construction, and post-construction phases is feasible and reasonable.

American River Mitigation Site (Urrutia Mitigation Site)

The use of the American River Mitigation Site acronym “ARMS” obscures the fact that the proposed action is at the Urrutia Site, also known as the former Gardenland Sand and Gravel Mine, as it has been known or referred to by the project partners, the County, and stakeholders for decades. While the SEIS/SEIR does include several references for these common names for the property, the invention and implementation of the term “ARMS” is a misnomer. The use of this term serves to confuse and obscure the location is the Urrutia property. Furthermore, the Urrutia family is a long-standing member of the Sacramento community and contributes to our history. The acronym is deceptive and insensitive and functions as an attempt at the erasure of local history. We will continue to refer to this site as the Urrutia Site and will refer to it as the Urrutia Mitigation Site (UMS) in our comments that follow.

Executive Summary

The Executive Summary indicates that the Proposed Action and Alternatives (CEQA) consists of design refinements to the authorized ARCF 2016 project including ARP erosion contracts, [Urrutia Mitigation Site], and SRMS.

- The Urrutia Mitigation Site was not authorized in the 2016 document (p. ES-1).
- There are also multiple inconsistencies between the Avoidance, Minimization and Management Measures identified in Table ES.1 and the mitigation measures presented in Table 4.4.1-5.

Community Outreach, Agency Coordination, and Areas of Known Controversy

Section 2.3 identifies that the Urrutia Mitigation Site was an area of controversy and that the scoping process led to further coordination with Regional Parks.

- The USACE did not coordinate with Regional Parks to discuss or seek guidance on suitable alternatives for habitat mitigation within the Parkway that would be suitable for providing juvenile salmonid rearing, riparian, and/or VELB habitat. Although several meetings were held with Regional Parks over the last year these meetings are best described as briefings on design progress and a consistent reiteration of a “lack of authorization” to preserve any of the existing resource values Regional Parks asked the project partners to consider. The “lack of authorization” as stated was based on the idea that because the property had been acquired to satisfy mitigation this meant every part of the property had to be utilized to satisfy mitigation. However, Regional Parks refuted this position as it would be at odds with the agency mission or mandate to use their authorization to protect the environment, and because of the pre-decisional nature of this position, it would be at odds with CEQA and NEPA compliance. The messaging in the SEIS/SEIR indicates that “USACE authorization limits the development of recreational and interpretive facilities in association with the project.” We have maintained that our concern is related to the unique habitat values that pond offers, especially when there is a scarcity of deep open -water habitat. Regardless, property acquisition should have been undertaken with consideration of environmental impacts and an understanding of the property constraints. While the CEQA lead agency determined that they had to consider a pond-retention alternative based on our request, there is no pond-retention alternative considered under NEPA. It is not clear that an alternative evaluated under CEQA to retain a portion of the existing 58.8-acre pond could be implemented since all pond retention alternatives were eliminated from consideration under NEPA. This approach has been insincere and demonstrates that the project partners were pre-decisional when they acquired the property in relation to implementing the proposed project, or some other similar scenario, before it had properly been analyzed under NEPA and CEQA.
- Further true coordination during scoping would likely have yielded refinements of mitigation alternatives, based on the emerging constraints, which would have been in better alignment with providing appropriate and reasonable mitigation without impacting valued Parkway resources and would have demonstrated a balanced management approach within the Parkway.

The SEIS/SEIR notes that areas on the property are being protected because of biological (i.e., nesting bald eagles) and cultural resources based on consultation with tribes and USFWS.

- Coordination with Regional Parks related to management of resources within the Parkway per the ARPP has not occurred. Protection of existing values provided at the Urrutia Site, above and beyond, the ones identified by the tribes and USFWS have not been seriously considered. The coordination with the tribes and USFWS indicates that existing resources at the site can be protected. Protection of the natural resources within the Parkway is required by the state approved American River Parkway Plan (ARPP). Since the SEIS/SEIR recognizes that the Parkway is a state and federally designated Wild and Scenic River, which is managed by Regional Parks in accordance with the goals and policies of the ARPP it is unacceptable that the resources we have identified are so easily dismissed. The lack of genuine coordination and consideration of the concerns we have identified related to the protection of Parkway resources is unacceptable. Regardless, proposed projects are still subject to the approval process outlined in the ARPP where it is suggested that project proponents are encouraged to coordinate with Regional Parks early to help ensure consistency with the goals and policies of the ARPP.

Section 3.3 Alternative Development and Screening

Section 3.3.1 indicates that more than one alternative to retain a portion of pond was considered but only for CEQA.

- There is no discussion of the alternatives considered under NEPA until reaching the section that discusses the alternatives that were rejected. The proposed alternative to convert and eliminate the existing open water and grassland habitat types to primarily inundated riparian scrub or upland elderberry scrub habitat types is apparently the only alternative analyzed under NEPA other than no action alternative. *This is unacceptable as there are other opportunities that were not considered that could provide the needed habitat mitigation without eliminating habitat with existing values that are important for the Parkway and the Sacramento Region.*

Historically, the confluence region had several open water ponds and lake habitat surrounding the area that were obliterated as a result of the levees and development. It is irrelevant that this pond is manmade. It should be thought of as a mitigation for the loss of the historical water bodies that were in the area and has become a critical landscape feature for so many species. A map from 1907 (below) shows a very large Bushy Lake connected to Fisherman's Lake in Natomas. Bannan's Slough was connected to Bush Lake and the Sacramento River. This was just north of the Urrutia property. It appears the channelization and levee building (NEMDC) destroyed this connection and associated aquatic habitats. Retaining the Urrutia pond is barely a drop in the bucket for waterbirds along the flyway, turtles, snakes, beavers, and other species that have seen so much habitat conversion and loss.

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and channelized into what is now the Natomas East Main Drainage Channel and Bannon Slough, which destroyed the associated aquatic habitats. However, the landscape still seems to provide some evidence of these historical conditions at the Urrutia Site. The document fails to recognize the limited amount of off-channel open water habitat that is present in the Parkway and regionally and that this is important habitat for migrating waterbirds.



27 The American River habitat mitigation alternatives discussed in the SEIS/SEIR that were rejected from consideration include a cohort of eight (8) side channel sites and the so called “incomplete pond-retention” alternative, which Regional Parks provided during scoping as an example for our request that consideration be given to “[preserving] a substantial portion of the isolated pond.” This alternative has been labeled alternative 4a (not to be confused with contract 4A). In addition, another pond-retention alternative was developed, which is called alternative 4b (not to be confused with Contract 4B) that includes retention of a smaller size pond that is about 20 acres. Note that it was not clear that another alternative was being considered until a reference is made in the text about rejecting alternative 4b and it was not until reading through Table 3.3.4-1 where you learn that the alternative represents preserving a portion of a pond. Ultimately the USACE decided that none of these alternatives were worthy of analysis under NEPA. The non-federal project partners decided to only reject analysis of the 8 side channel sites under CEQA. The discrepancy between the NEPA and CEQA analysis seems to suggest that the project partners were not in alignment related to the American River habitat mitigation approach. However, there may have been alignment between the partners since the results of the CEQA analysis would not really matter because ultimately the only habitat mitigation that could or would be implemented by the project partners would either be the proposed project or no project at all. *This approach is completely disingenuous and needs to be reconciled and when paired with the acquisition of the property appears to be pre-decisional.*

Table 3.3.4.1 also includes two other sites for juvenile salmonid habitat mitigation, Rossmoor Bar and Sailor Bar, as well as an alternative to plant at the construction/project sites, which were

supposedly considered but rejected from analysis under both NEPA and CEQA but there is no discussion of these sites in the text. The lack of discussion related to these sites in the text either suggests that they were accidentally omitted or that these were accidentally included in the table but are not actually alternatives that were considered. It is also quite alarming to think that planting at the construction/project sites has been rejected as an alternative. While this is likely an error it does suggest that planting at the construction/project sites would not occur even though discussions in the text indicate planting would occur at the construction/project sites. A description and discussion of the alternatives that were rejected as identified in Table 3.3.4.1 but not discussed in the text needs to be provided.

- One of the justifications provided for rejecting the alternatives that preserve a portion of the pond that is cited in Section 3.3.2 is based upon a supposed NMFS requirement that a large mitigation site is required and must be constructed concurrent with construction. The 2021 Biological Opinion (BO) is cited to support this claim but upon review of this BO the large mitigation site discussed is specifically related to Sacramento River mitigation. Reasonable and Prudent Measure (RPM) 5.e. is explicitly stated as being the reason why suitable salmonid habitat mitigation sites are limited along the American River. *However, RPM 5.e is related to a requirement to provide 65% plans to NMFS for review and approval and has nothing to do with a requirement to provide a large mitigation site.*
- 27 • Furthermore, the 2021 BO analyzes the previously proposed Arden Pond site and indicates that this site was not expected to satisfy all the mitigation requirements for the bank protection along the American River and that *if sites along the American River are unavailable then sites along the Sacramento River mainstem may be used to satisfy American River mitigation requirements.*
- Since there is not currently a BO associated with the Urrutia Site and because the construction of the proposed project is expected to have effects on listed fish it is likely that the USACE is expected to reinitiate consultation with NMFS. Since the project partners are responsible for providing a Biological Assessment associated with the project impacts, it will no doubt include a discussion of why Arden Pond was not implemented, and how the new approach that is being proposed can be incorporated into the reinitiated BO. *It is imperative that the proposed approach in the Biological Assessment for reinitiation is inclusive of the constraints that Regional Parks and local stakeholders have, and will continue to highlight, that could halt or delay the proposed approach.*
- Additionally, during one Urrutia meeting we recall NMFS indicating that they had no desire to engage in another project like Arden Pond project that would ultimately not be carried forward due to the concerns stakeholders raised related to the loss of deep open water habitat. If Urrutia was on the same course, it would be preferred to incorporate the concerns at the beginning of the design process. While NMFS was not necessarily excited about preserving any portion of the pond, they recognized that other habitat values exist and should be incorporated early in the design process to help guarantee that the project could move forward and ultimately ensure a high-quality juvenile rearing habitat mitigation would be implemented as part of the design. In other words, it was indicated that they would consider habitat mitigation at the Urrutia Site even if that meant a portion of the pond was retained. It should be noted that NMFS' attitude related to a collaborative approach has remained consistent from the initiation of this project with their requirement to engage with the Bank Protection Working Group related to bank protection

designs. To claim that NMFS is a contributing factor for rejecting the alternatives discussed is not factual. NMFS will consider project proposals provided to them and while they may reject them and/or indicate there are additional requirements during consultation this has yet to occur after the consultation in which Arden Pond was analyzed. *Therefore, we do not find the rejection of the two pond preservation alternatives based on the supposed requirements imposed by NMFS as valid or factually accurate.*

- The SEIS/SEIR also attempts to suggest that somehow the USACE requirement to consult and acquired a consistency determination from the National Park Service is a reason that “sites for creating suitable salmonid habitat mitigation are limited along the American River.” It is unclear why this process imposes a limitation to habitat mitigation. Furthermore, since the ARPP is the management plan for both the state and federal Wild and Scenic River designation, and Regional Parks is responsible for administering the ARPP, it is not clear to us how a consistency determination under the National Wild and Scenic River Act and/or the ARPP would result in a condition that limited creation of valuable salmonid habitat to a single large site. Particularly when there are many locations that could be proposed for enhancement or creation along the Parkway that would be closer to the impact sites and would be less impactful. *We do not believe the state or federal Wild and Scenic designation is a valid reason for rejecting alternatives that preserve a significant portion of the pond, in fact this designation is the reason to call for more alternatives.*
- Section 3.3.2 takes another tactic to justify rejection of alternatives to preserve a pond by indicating the pond is “considered a recreational feature with no value because it does not meet species habitat mitigation criteria.” And that the “[USACE is not authorized] to spend appropriations on recreation improvements or the long-term management of a non-life and safety features.”
- First, Regional Parks would remind the project partners that the previously proposed Arden Pond site that would satisfy some of the project mitigation requirements did preserve a portion of that pond principally as a recreational feature. The design included elements in and around that pond to enhance the adjacent mitigation area to reduce fish stranding and additional grading to prevent aquatic invasive weeds in the portion of the pond that was being preserved. We cannot reconcile why preservation of a pond would have been acceptable at Arden Pond but not at Urrutia. The only real difference between these two proposed projects is size and location. Though from a land use perspective Arden Pond does legitimately provide for recreation use (e.g., boating and fish are not restricted), whereas the ARPP limits use of the Urrutia pond to director approved interpretive use (i.e., the pond is not meant to be a recreational feature). *An explanation is required for the different interpretations of “authorization” and how this is related to an ability to meet or not meet “species habitat mitigation criteria” for two virtually identical projects (i.e., Arden Pond versus Urrutia Pond).*
- Second, to decide that the Urrutia pond is only a recreational feature if it does not meet the project mitigation criteria is completely absurd. The pond does provide existing values for a host of regional wildlife species year-round for both foraging and resting and also supports avian species far and wide as it is a prominent large open water feature on the landscape along the Pacific Flyway. The hyperfocus on meeting all of the mitigation requirements for juvenile fish, cuckoo, and VELB needs for the project in this one area is not a viable conservation strategy

particularly when the complete conversion of habitat will eliminate critically important scarce open water habitat and grasslands. A holistic and balanced management strategy is needed to support listed species, as well as species that could be negatively impacted by the continued loss of important scarce habitat (i.e., large bodies of open water habitat), whether through complete habitat conversion for “restoration/mitigation” or through development. It also must be recognized that the Bald Eagles selected this site for nesting, and they have been successful. The availability of both riverine and lacustrine (i.e., the Urrutia pond) are likely factors as to why the eagles have selected this location on the American River to nest (Airola et al., 2023) and have been successful. To convert the existing habitat could potentially affect the continued success of the Bald eagles at this site and would impact many other species that rely on the off-channel deep open water habitat and the adjacent grasslands. *The document does not adequately consider the habitat elements present in the landscape that are important to the selection of the nest tree by the eagle pair nor the factors at the site that have led to breeding success. Additional details need to be provided to support the claim that a pond would be classified as “recreational” due to the inability to fully mitigate project impacts.*

- Third, the statement that the “[USACE is not authorized] to spend appropriations [...] on the long-term management of a non-life and safety features” needs further clarification as this appears to be in direct conflict with the BO requirement that mitigation needs to be protected and maintained in perpetuity. An explanation is needed for how any of the existing or proposed mitigation sites will be maintained for the long-term is required. This is not a valid reason to reject an alternative that preserves a portion of the pond.
- Section 3.3.2 also indicates that the existing Bald Eagle nesting is a contributing factor to rejecting an alternative that includes pond preservation. The project partners cite requirements under state and federal laws to provide a buffer around the nest tree, which would exclude construction activities from occurring to preserve a pond. The same conditions exist for the site regardless of whether the design preserves a portion of the pond or does not. Aside from the regulations to protect the eagles during nesting, if the project partners or resource agencies were concerned about protecting the nest the preferred alternative would be to preserve a portion of the pond and protect adjacent grasslands. It is assumed that there will be construction within the eagle buffer as a result of contouring in the pond and or to conduct the hazardous materials cleanup on the site (of which the associated action and analysis has not been provided). *The reliance on the construction buffers required to protect the Bald Eagle nest does not support the rejection of a pond preservation alternative because this condition exists for any construction at the site.*
- There is also a statement in Section 3.3.2 that indicates the “there [would] be additional costs related to building a berm to separate a pond from mitigation.” A comparison of the costs to construct the proposed project to the alternatives that retain a portion of a pond should be provided to support this claim. It should include a comparison of volumes of fill for each alternative and the progression of constructability. *Additionally, an explanation of how constructing a berm at Urrutia is much different in cost than constructing a berm at Arden Pond should be provided. Details about the monetary costs of constructing the proposed action vs constructing the alternatives should also be provided to provide the differences/similarities between required fill volumes and constructability between various alternatives.*

- Section 3.3.2 also indicates that eight side-channel fish habitat sites were considered but they conflicted with work being implemented by the USACE and Bureau of Reclamation. It is indicated that these 8 side channel fish habitat sites were previously discussed in the original EIS/EIR and in the Contract 2 SIES/SEIR, but this does not appear to be correct. These sites were discussed with Regional Parks years ago and we recall that NMFS ultimately rejected the proposal due to the conflicting authorizations of two different projects. We do not understand why the previously proposed Rossmoor site would be captured in this fish mitigation discussion since that site provides upland habitat for VELB. Nor is it understood why the previously proposed Arden Pond is included in the discussion since it was previously approved under NEPA and CEQA.
- Since Arden Pond is mentioned in this SIES/SEIR, we want to remind the project partners that Regional Parks sent a letter to the project manager for mitigation on May 19, 2021 (Attachment 1). In this letter, Regional Parks [again] expressed concern over the loss of open water habitat [at Arden Pond] and asked for a comprehensive mitigation alternatives analysis. Additionally, this letter indicated the importance of stakeholder engagement during the project design phase prior to project approval for mitigation projects within the Parkway and requested that the USACE utilize the Lower American River Task Force (LARTF) and working groups as a venue for planning and evaluation for proposed mitigation sites. *Though this letter was centered primarily around Arden Pond the statements made in this letter included the approach for mitigation planning within the Parkway and remain valid for the current discussions related to planning at the Urrutia Site.*
- Section 3.3.2 also indicates that Regional Parks was asked to identify potential sites for salmonid habitat mitigation but apparently the result of that coordination still led to the need for additional off-site mitigation and/or bank credits. We do not recall this coordination to identify fish mitigation, either multiple sites or a single large site. Coordination with Regional Parks has primarily centered on minimizing and/or avoiding impacts related to bank protection and providing guidance for VELB mitigation in the Parkway. *However, Regional Parks would be a proactive partner in identifying reasonable mitigation alternatives for suitable fish habitat in the Parkway that could be pursued if the proposed project alternative is not approved or needs to be modified with respect to protecting other valued natural resources.*

Regional Parks was notified that the Urrutia Site was included in the September 2020 American River Common Features Mitigation Site Concept Development and Evaluation Report, prepared by GEI Consultants in collaboration with cbec. In addition to the Urrutia Site and Arden Pond, this report identified six (6) other sites along the American River that could provide juvenile rearing habitat along the American River. We do not understand why these sites were dismissed from consideration and were not included in an alternatives analysis. The 6 other sites along with Arden Pond and Urrutia provide opportunities to ensure the impacts along a 5.5-mile stretch could be better offset with a strategy that considered the needs along the entirety of the American River corridor for fish instead of a single site with a shoreline opening of about 0.2 miles along the river that is approximately 4.5 miles away from the location of construction impacts.

- The SEIS/SEIR makes many unsupported statements and claims to reject an alternative that retains a portion of a pond for analysis under NEPA. This, in conjunction with the lack of

coordination and discrepancy in the approach between NEPA and CEQA, leads us to conclude that the foundational environmental analysis in the SEIS/SEIR is inadequate for making an informed decision that would lead to project approval.

- 27 It should be noted that there is a lack of discussion related to VELB mitigation and alternative locations. Regional Parks has previously indicated to the USACE on multiple occasions that we can identify additional mitigation areas for VELB habitat within the Parkway. However, we also understand that there may be other options being discussed with USFWS. Additional details should be provided related to new mitigation strategies being considered in relation to m for VELB impacts withing the Parkway.

Section 3.5 Alternative 2: Proposed Action

Section 3.5 states that the “Analysis of the [Urrutia Mitigation Site] is presented at a conceptual (program) level since the USACE design process is in such an early phase.” It is understood that this means an additional analysis will be conducted at the project level under NEPA and CEQA. *However, the environmental baseline is inadequate even for the program level analysis provided in the SIES/SIER.*

Section 3.5 states “Table 3.5.5-1 presents the mitigation needs for all the ARCF 2016 Project contracts, not only the American River Contracts, to be met at the [Urrutia Mitigation Site].”

- Regional Parks sent an email sent on June 2, 2021 (Attachment 2) to the USACE project managers for erosion and mitigation efforts making it clear that “Restoration and mitigation completed on the American River Parkway will only be for bank protection work on the American River, not including any projects from the Sacramento River.” This was reiterated again in the letter we submitted during the scoping period on December 29, 2022. *It is unacceptable to mitigate for impacts within the American River Parkway for Sacramento River impacts. This is in alignment with the goals of the ARPP. The table needs to be revised to indicate the required mitigation needs tied specifically to each contract number for each of the mitigation habitat types. Additionally, all alternatives need to be revised in response to this comment. Utilizing Urrutia for Sacramento River mitigation is not acceptable.*
- Section 3.5 states “Habitat mitigation is consistent with the Wild and Scenic Rivers corridor by providing riparian wildlife habitat. (Parks 2022).”
- This is not accurate. The December 29, 2 letter submitted during scoping conveyed the following: “the Parkway Plan states that habitat restoration, local drainage, public utilities and flood control facilities, as determined to be appropriate to and permitted within a Wild and Scenic Rivers corridor, are permitted in all land use categories.” The letter also goes on to state “that any physical development proposal which is not consistent with the approved Area Plan in which the development would occur should not proceed to the contract drawing stage until the proposal has been approved in accordance with the planning and development process spelled out in Chapter 11 of the Parkway Plan.”

In Section 3.5.5.1, the document states “The [Urrutia Mitigation Site] would be constructed to provide mitigation habitat for Federally listed species, as identified in the USFWS and NMFS BOs. The [Urrutia Mitigation Site] would also be mitigation for regional habitats that are defined in the ARCF Fish and Wildlife Coordination Act (FWCA) Report (USFWS 2015) such as riparian forest and riparian scrub-shrub, elderberry savannah and seasonal floodplain wetlands.”

- The FWCA Report (issued October 5, 2015) does not identify “pond” or “lacustrine” habitat specifically because the Urrutia Mitigation Site had not yet been identified for potential mitigation. The 58-acre pond is a deep-water habitat that is presently used by populations of diving ducks and other waterbirds. The impacts of habitat conversion need to be clearly identified, analyzed, and included in the FWCA. The FCWA recognizes “Herons and egrets were selected because of the Service's responsibilities for their management under the Migratory Bird Treaty Act, their relatively high value for non-consumptive human uses, such as bird watching, and their value as indicator species for the many birds which use SRA cover.” It is important to recognize that prior to the bald eagles nesting in the western sycamore tree, this tree was used as a rookery tree by great blue herons (Airola et al., 2023). *This tree was not previously recognized as a constraint as evidenced by the statement on page 3-7 of the document, but the existing bald eagle (Haliaeetus leucocephalus) nest was identified as a new constraint after Alternative 4a was developed”.*

In Section 3.5.5.1, the document states “The riparian vegetation would provide resting, foraging, roosting, and nesting habitat for numerous avian species, as well as the local terrestrial fauna.”

- The statement above is in reference to the habitat that would be created as a result of implementation, but the document contains no analysis of the species that presently use the Urrutia Site. Conversion of open deep-water habitat and open grassland (that is unhindered by overhead powerlines) to riparian scrub shrub will alter the composition of species that use the site. Two of the goals of the ARPP are balanced management (policy 1.1) and resource protection (policy 1.3), but complete conversion and elimination of the pond and upland grassland is not balanced management or resource protection.

In Section 3.5.5.1, the document states “Since there is only one residence near the project site, and this residence is expected to be vacated prior to construction of the [Urrutia Mitigation Site] improvements, night work could be considered.”

- Regional Parks owns this home, and it has the potential to be occupied by a caretaker. Working at night could have a significant impact on wildlife species and additional information is required to analyze this impact.

In Section 3.5.5.1, the document states “Performance and success criteria have not yet been defined and would be included in a Habitat Enhancement and Restoration Plan that is drafted in coordination with the project partners.”

- Without retention of the pond, or a portion of the pond, Regional Parks views this as a habitat conversion for in-kind mitigation and not truly a habitat enhancement or restoration project. The

Plan should actually be called a long-term management plan. Despite this view, Regional Parks needs to be engaged in this process as the manager of the Parkway.

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Section 4.2.1 Human Environment

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In Section 4.2.1, the document states “The [Urrutia Mitigation Site] is privately owned, and the design features would not include developing additional recreational resources”. *This statement is not accurate. The Urrutia Site is now owned by SAFCA, a public agency.*

In Section 4.2.1, the document states “The area is used for wildlife and bird watching from adjacent parcels. During construction, wildlife and birds would likely be scared away from the site but once the mitigation site is established, it is anticipated that restoring a more natural habitat would provide benefits to a wider range of native and migratory birds.” *This statement is false. There is currently a wide range of species that utilize the existing habitat that will likely not return because their preferred habitat types will no longer exist as a result of the proposed conversion of habitat types. Some species may still utilize the new habitat at the site but maybe to a lesser extent than they do now. The conversion and elimination of the isolated deep-water pond and the grasslands to frequently inundated riparian scrub floodplain habitat and elderberry scrub uplands will no longer be suitable for a host of species that aquatic habitats or grasslands. Retaining a portion of the pond would create a site with riverine, floodplain, and lacustrine habitat. This would provide for the greatest habitat complexity and diversity of species using the site. It should be noted that pond turtles rely on both aquatic habitat and upland habitat for nesting.*

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In Section 4.2.1, it is indicated that access to the site during construction might be needed through Camp Pollock and Discovery Park, and if this were to occur there would be a short-term significant and unavoidable impact on recreational use. Haul trucks would disrupt the noise, air pollution, odors, and visual resources for those wanting to recreate in these areas; but flaggers would be present when there is high construction traffic. The impact would be less-than-significant with implementation of previously adopted Mitigation Measure REC-1, Implement Bicycle and Pedestrian Detours, Provide Construction Period Information on Facility Closures, and Coordination to Repair Damage to Recreational Areas (See Appendix B 2.2, Section 2.2.3.4), to those using the Jedediah Smith Memorial Trail. However, the Proposed Action would result in a long-term less-than-significant impact on recreation after construction activities are complete.” *The impacts of using Discovery Park and Camp Pollock have not been analyzed. Noise, pollution, and odors cannot be mitigated with a flagger alone. It is not clear if the haul routes that are proposed would utilize bike trails or utility corridors. Regardless, Regional Parks expects that the ingress/egress point for any construction at Urrutia would occur from Northgate Blvd and that there would be no impacts to the bike trail and horse trail. Impacts from hauling could lead to soil compaction and impacts vegetation. Generally, the impacts have not been defined or analyzed, it cannot be blanketly stated that the actions would be less-than-significant. Realizing that many major events occur within the Parkway, particularly at Discovery Park and Camp Pollock, the statement "there would be a short-term significant and unavoidable impact to the recreational use" requires a clear identification of what types of impacts. Any impact to the major events planned within the Parkway is unacceptable. Additionally, the "long-term" impact on recreation is not clearly defined. The conclusion of a "long-term less-than-significant impact on recreation after construction activities are complete" warrants re-evaluation since the ARPP clearly states goals of*

non-motorized boating and fishing (Policies 10.6.3 and 10.6.4). Implementation of the Proposed Action as presently described in the SEIS/SEIR would permanently remove the opportunity for fishing and boating and interpretive use by indigenous peoples within the Urrutia pond.

Section 4.3 Recreation

In Section 4.3.3, the document states “The [NRMP] identifies the area around the man-made pond in the ‘naturalization’ resource management category, which includes areas that were substantially altered in the past and should be modified in order to improve existing natural resource conditions.” *The NRMP defines areas designated for naturalization as those that “were substantially altered in the past and should be modified in order to improve existing natural resource conditions or otherwise modify to meet the management objectives of the ARPP and NRMP.” The statement above does not recognize the latter half of the statement and the importance of the ARPP goals and policies. The NRMP identifies that that a conceptual naturalization plan for Urrutia should be developed if it is brought into public ownership and the plan “should include the removal of rubble and restoration of the bank line in consideration of current and future conditions” and refers the reader to the ARPP. The NRMP also indicates that the Urrutia pond is an incredibly important habitat for waterbirds since there is a scarcity of deep open water habitat. The proposed project does not recognize the existing values, does not include removal of rubble from the bank line, and the conversion of the limited habitat types in the area does not speak to a balanced management approach or natural resource protection as called for in the goals and policies of the ARPP.*

In Section 4.3.3, the document states “The types of activities that will be implemented to create the mitigation sites align with the types of activities listed under the naturalization category of the natural resource management activities listed in the [NRMP]. The activities associated with the [Urrutia Mitigation Site] would be consistent with the policies of the [NRMP] that are intended to avoid or mitigate environmental effects (Please refer to Appendix B, Section 2.4, “Land Use and Prime and Unique Farmlands,” for a detailed comparison), leading to an avoidance of significant impact with planned mitigation.” *The NRMP was developed to be consistent with the ARPP. Specifically, the ARPP does not recognize a change of vegetation communities or habitat types in this area and outlines the requirement for resource protection and balanced management.*

Section 4.4 Physical Resources

In Section 4.4.1.2.2, the document states “Ground disturbance and vegetation removal conducted for the [Urrutia Mitigation Site] project would disrupt the scenic views of the American River area. As vegetation matures and returns visual quality to the site, the short-term significant unavoidable impact to the scenic views would reduce to a less than significant impact. In addition, the views and tranquility of the Jedediah Smith Memorial Trail, Camp Pollock, and Discovery Park would also have short-term significant unavoidable impacts from implementing the Proposed Action. *The visual aesthetic of the proposed project will appear to be a pond that was drained with short statured riparian scrub plants.* The habitat area will always appear artificial and will be an oddity in the landscape.

In Section 4.4.7.2, the document states “The closest sensitive receptors to the [Urrutia Mitigation Site] are residential properties located approximately 400 feet north of the project site”. *Camp*

Pollock should be identified as a sensitive receptor as this facility regularly hosts K-12 education programs.

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In Section 4.4.8, the document states “SAFCA is currently conducting additional Phase II ESA activities to scope a Corrective Action Plan (CAP) for the site. The CAP will determine actions that must be taken to remove the potential for surface or groundwater impairments or risk to future sensitive receptors. Additional site investigations include soil borings, test pits, surface samples, and groundwater samples in locations that have showed elevated concentrations of constituents of concern. SAFCA will be required to achieve closure of the listing prior to use of the site for habitat restoration.” *The Corrective Action Plan should be described in this document. All soil borings or test pits should be conducted with a tribal monitor present. The constituents of concern need to be defined in this document and if left submerged under the pond would not be a concern. Furthermore, the potential impact associated with SAFCA’s work needs to be disclosed and potential impacts analyzed.*

Section 4.5 Ecological and Biological Resources–

In Section 4.5.1.1, the document states “The man-made pond is perennially filled with water due to groundwater connection with the LAR. The land surrounding the pond is characterized mainly by riparian forest/scrub, with some ruderal herbaceous/grassland vegetation”. *The environmental baseline described above is not consistent with the vegetation map included in the NRMP nor with aerial image interpretation. Table 4.4.4-1 on page 4-185 more accurately identifies that ruderal herbaceous/grassland as the dominate vegetation community. This community is also key for foraging raptors and is much more suitable since the grassland is unimpeded by power lines.*

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Section 4.5.1.2.1 states: “[Urrutia Mitigation Site] will remain a man-made pond in private ownership.” This is inaccurate. The correct environmental baseline for the property is that it is owned by SAFCA, a public agency.

Section 4.5.1.2.2 states: “In addition, all construction activities for the Proposed Action could interfere with local movement of native resident or migratory wildlife species.” *The construction activities will likely temporarily and permanently impact the migratory and local species.*

Section 4.5.1.2.2 states: “Equipment and personnel movement and vegetation removal during construction could interfere with the movement of terrestrial wildlife species; however, these activities are not expected to result in substantial effects on the movement of these species because they are mobile and can move away from construction activities to unaffected areas.” *The wildlife corridor in the area is narrow and geographically limited. It is not accurate to conclude that major construction activities will not result in substantial effects on the movement of species. The SIES/SIER needs to consider the wildlife species that cannot just “move away” for example brumating turtles, snakes, and turtles. The Parkway in the Urrutia area is in a highly urbanized environment and wildlife don’t have a lot of options in the area.*

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Section 4.5.1.2.2 states: “The [ARPP] states, in Policy 4.12, that ‘Vegetation in the Parkway should be appropriately managed to maintain the structural integrity and conveyance capacity of the flood

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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. The Sacramento County Tree Preservation Ordinance requires ‘A Tree Pruning or Tree Removal Permit...to prune or remove any public tree and certain private trees.’ Project Partners would include Sacramento County tree removal work to ensure compliance with county ordinance”. The Director of Regional Parks *has authority over tree removal within the Parkway. Converting the upland grassland into a riparian scrub community increases roughness within the floodway and removes existing important habitat for terrestrial wildlife and avian species that rely on it.*

Table 4.4.1-3 fails to identify the CEQA or NEPA significance identified for the Urrutia Mitigation Site associated with impacts 4.1-a nor 4.1-b

- *Section 4.5.1.2.2 states: “[Urrutia Mitigation Site] would emphasize restoration to native floodplain wetland and riparian habitats, consideration of river dynamics, and adaptive management of the features as described in the Parkway Plan and NRMP (HDR 2023).” It is not clear how this action would contribute to adaptive management of the Parkway nor what specific features this sentence is referring to. To be consistent with the ARPP the action should propose a balanced approach to ecosystem management. Historically, Urrutia property has primarily been upland associated with the American River with a drainage and associated small ponds. The proposed project at the Urrutia Site would convert the “man-made pond” into frequently inundated floodplain and is not restoring the site to historical conditions. This language is vague and dismissive and does not identify specific impacts, actions, wildlife habitat values, or ecosystem services that would be altered or augmented by the proposed action.*

Section 4.5.1.2.2 states: “In the post-project condition, it is anticipated that there will be a net increase in freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats, while a reduction in grassland/upland and pond habitats would occur (HDR 2023).” *The loss of the pond and grassland habitat has not been evaluated in the document. The pond has been on the landscape for decades and has existing wildlife habitat values that must be acknowledged and evaluated in the document. To convert the existing 58-acre off-channel pond to freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats requires additional analysis. These are very different habitat types which support different wildlife species. The existing resource values of the off-channel pond need to be identified and disclosed in this document. The grassland is a large open area with no power lines for raptors to hunt and the pond is significant for waterbirds. These habitats as now far and few between for these species.*

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Section 4.5.1.2.2 states: “This would convert existing upland and open water habitat on the land side of a natural levee to low-flow channels with a wetland fringe and connected floodplain. Approximate habitat acres are estimated at the 35% design level are: 16.2 ac of freshwater emergent, 0.0 acres pond, 55.4 acres riparian forest, and 28.2 acres of valley-foothill grasslands. These estimates will be refined by the final draft.” While it is stated that habitat is being converted it should be noted that this would eliminate important open water and grassland habitat. *The text does not clearly identify the present vegetation types and acreage that would be converted to the*

vegetation types post-project, although post-project acreage is provided. What is described as valley-foothill grasslands is incredibly important to understand how this would be changed.

In 4.5.1.2.2, it is recognized that “Any trees planted onsite would take many years to mature to provide the same value as those removed; therefore, this impact is significant in the short term, but no effect in the long-term because these sites mitigate for project-wide impacts”. *The document should define the terms “short-term” and “long-term” because when we discuss tree removal and habitat conversion it is very long-term for the ecosystem to recover. The document also does not define the term “value” that is associated with trees, and it should acknowledge that different tree species perform different ecosystem services. Trees provide valuable ecosystem services including carbon sequestration, oxygen production, absorbing pollutants (e.g., ozone, nitrogen dioxide, sulphur dioxide), intercepting particulates (e.g., dust, ash, smoke), and lowering air temperature. The size (i.e., diameter standard height [DSH]) of a tree also influences a tree’s ecosystem services value. There are quantifiable ways to calculate tree benefits by species and size (iTree, National Tree Benefit Calculator, etc.). The document should identify the species, size, canopy area as measured by tree dripline and values (expressed in dollars as evaluated by ecosystem services) for each tree removed. Similarly, planting sapling trees will take many years to mature, and the ecosystem services will be absent or significantly reduced until the trees planted as mitigation are the same size as when they were cut. The value of sapling trees can also be calculated with these aforementioned tools. This calculus does not account for the greater benefit that existing mature trees would add to the environment had they been preserved or retained on the landscape. This is an important consideration since mature trees provide greater ecosystem services as they sequester more carbon than younger trees and filter more pollutants. The habitat value of trees extends far beyond the replacement of nesting sites and the document should quantify the loss of tree values numerically. As presently written, the document does not contain a clear qualitative nor quantitative accounting of the tree values that would be lost in the unspecified timelines defined as “short-term” and “long-term”.*

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Section 4.5.1.2.2 states: Table 4.4.1-4 should sum the vegetation impacts from each location. There are at least 82 acres of impact to valley foothill riparian vegetation.

Section 4.5.1.2.3 states “If an Impact Number is not listed in the table below there is no change in impact for that alternative.” *It would be helpful to have the ARCF GRR Final EIS/EIR impact table and it should have been provided. The presentation of the impact tables in the current document are not in the same format as the ARCF GRR 2015 Final EIS/EIR. The presentation of the effect, significance, and mitigation in the 2015 Final EIS/EIR is more understandable and succinct than the current document offers. All impact tables in the document should be recognized.*

- The discussion of Impact 4.1-a, associated with Table 4.4.1-5, states “All alternatives would have similar construction and operations impacts on wildlife movement, with the greatest impact being from potential nighttime construction at the erosion sites.” *The Central Valley has lost over 95 percent of native grasslands, riparian habitat, wetlands, and vernal pools greatly reducing populations of birds and wintering waterbirds (Eric Ross 2024). The document has not identified the species nor discussed the impacts on wildlife movements that could be impacted by nighttime work. Nighttime work with artificial lighting would negatively impact Parkway resources and should be avoided in accordance with the ARPP*

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and the NRMP. The analysis 1) only considers the impact of nighttime construction on wildlife movement, 2) does not consider the impact of daytime construction in a narrow urban greenbelt that also serves as a wildlife movement corridor, and 3) does not analyze how the loss/conversion of the pond at the proposed Urrutia Mitigation Site location would interfere with the diurnal movements of wildlife, specifically waterbirds.

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Appendix B

4.1.1 Existing Conditions/Affected Environment

“The existing conditions at the American River [...] sites are described in Section 3.6, “Vegetation and Wildlife” (pages 109–115), of the ARCF GRR FEIS/EIR.” Where it states on Page 114: “Levee slopes along the American River are primarily covered with grasses and a few scattered trees within the levee structure. Several areas within the Parkway have been used as mitigation sites for Corps and other agency projects for endangered species. There are also some areas within the Parkway that have been used to compensate for loss of riparian habitat or oak woodlands from other projects.”

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- The current document relies upon the environmental baseline presented in the ARCF GRR Final EIS/EIR (Dec 2015). The established baseline is therefore 9 or more years old. Please clarify if additional field studies were performed to support the analysis presented in this document as conditions certainly have changed in some areas.

“The river is bordered by commercial and residential neighborhoods on the landside of the levees and the American River Parkway between the levees. American River Erosion Contract 3B illustrated in Figure 4.1-1 includes the portion of the Lower American River, both above and below the ordinary high-water mark (OHWM).”

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- The document should state the corresponding elevation of the OHWM and the associated flows.

“The existing conditions described in Section 3.6, “Vegetation and Wildlife”, of the ARCF GRR FEIS/EIR is applicable to the resources found within the project site. The ARCF GRR FEIS/EIR used a slightly modified version of the California Wildlife Habitat Relationship System (CWHR) (Mayer and Laudenslayer, Jr. 1988) and includes descriptions of the following habitats: valley foothill riparian forest, oak woodland, ruderal herbaceous, wetland, and SRA habitat. Riverine/open water and agricultural habitat descriptions have been added and all habitats are described below. Table 4.1-1 provides a crosswalk between CWHR and Manual of California Vegetation Alliance natural community types.”

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- Table 4.1-1 does not identify the vegetation communities that are considered California Sensitive Natural Communities as listed by CDFW.

“The [Urrutia Mitigation Site] is a former sand and gravel mine, thus the most prominent feature of the site is approximately 55 acres of open water located approximately 400 feet from the river’s

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edge. This area is perennially filled with water due to groundwater connection with the American River. The proposed work would occur both above and below the OHWM of the American River.”

- The 55-acre pond has a subsurface hydrological connection to the American River, which is a tidally influenced water of the United States and is also a water of the state per the State Policy for Water Quality Control: State Wetland Definition and Procedures for Discharges of Dredged and Fill Material to the Waters of the State (SWRCB 2019). This area meets the definition of an “artificial wetland” per 3.d. The area is not presently subject to active surface mining and therefore is subject to Section 401 of the Clean Water Act. The document should clearly state the elevation of the OHWM along the American River at this location and provide more information of the groundwater connection. Connection to groundwater and depth to groundwater in relation to the proposed design is extremely important for determining efficacy of the project since it is proposed to drain the pond, which provides a buffering surface feature, and convert the Urrutia property to an excavated swale that would exist well below the historical grade.

“The site is between Discovery Park to the west, Camp Pollock to the east, and the river to the south. North of the site is Steelhead Creek, the levee, and commercial and residential development. Wildlife present along the American River Parkway includes deer, coyote, turkeys, racoons, reptiles, and many species of native and migratory birds.”

- The site also supports a high diversity of waterbirds (resident and migratory) as described in The Importance of Off-Channel Ponds to Wintering Waterbirds along the American River in Sacramento: California An Initial Assessment (Airola et. al 2023).

Figure 4.1-3 American River Mitigation Site Land Cover Types

- This figure does not have the same vegetation/land cover types as presented in Table 4.4.1-1 which includes wetlands as a habitat.

“The acreage of existing habitats at each project site are summarized in Table 4.1-2.”

- Table 4.1-2 presents the acreages of habitat types as described by CWHR. The current standard is to complete vegetation mapping using standards established by CDFW VegCAMP. The presentation of the land cover types based on CWHR is inconsistent with current standards and practices. Further, the CWHR types aggregate landcovers/vegetation types that would otherwise be unique if the Manual of California Vegetation was used as the classification standard.
- Table 4.1-2 indicates that 2.5 acres of wetlands are present at the Urrutia Mitigation Site, but Figure 4.1-3 American River Mitigation Site Land Cover Types does not depict this habitat/land cover type. The acreage presented for the Urrutia Mitigation Site in this table is 99.74 acres and is inconsistent with the acreage presented earlier on in the document.
- Table 4.1-2 footnote “[Urrutia Mitigation Site] - Riparian Forest/Scrub and Oak Woodland is composed of native and nonnative scrub and woodland”. The table does not indicate that there is Oak Woodland habitat/landcover at the Urrutia Mitigation Site although the footnote states otherwise. It is not appropriate to combine riparian forest and riparian scrub habitats to

describe the environmental baseline as different wildlife species are associated with forest habitats and scrub habitats. The table overgeneralizes and oversimplifies the vegetation communities at the project sites.

47 “In the vegetation maps (Figures 4.1-1 to 4.1-6), riparian habitat is referred to as hardwood, native and non-native woodland, native and non-native scrub, and riparian forest, depending on the vegetation classifications used by the vegetation field survey team.”

- Vegetation classifications should be conducted in accordance with the standardized protocol Survey of California Vegetation Classification and Mapping Standards, which is available on the CDFW VegCAMP website. If the vegetation maps are not standardized, how is the environmental baseline established and the impacts of the proposed action/project properly evaluated and analyzed to determine the level of impact, impact conclusion, and development of suitable mitigation?

“Several species of raptors, including Swainson’s hawk (*Buteo swainsoni*), red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), Cooper’s hawk (*Accipiter cooperii*), and great horned owl (*Bubo virginianus*), build their nests in the crowns of cottonwood, valley oak, and other large trees that currently exist on both the landside and waterside of the Sacramento and American River levees within the project area.”

- Section 4.1 as stated on page 4.1-1, “focuses on analysis of vegetation and non-sensitive wildlife.” The text above identifies raptors and owls, which are protected under the California Fish and Game Code and Swainson’s hawk is listed as threatened under CESA. It is unclear why bald eagles are therefore also not included in this list as the species was documented to nest at the Urrutia Mitigation Site in 2023. Although the bald eagle was delisted from the federal ESA in 2007, the species is still afforded protection under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act.

“Due to the urban development adjacent to the levees in the project area, wildlife is limited primarily to small mammals and various avian species, especially those species that are adapted to human disturbance.”

- The statement that “wildlife is limited primarily to small mammals and various avian species, especially those species that are adapted to human disturbance” is not accurate. Large mammals that visit the site include black-tailed deer and coyote. Bobcat has been identified in the LAR by the camera traps established at Bushy Lake, and Regional Parks issued an advisory notice to the public in January 2018 regarding a mountain lion reported in the Parkway. The document text is dismissive about the types of wildlife present in the project area and therefore a proper environmental baseline was not well established in the document. While the Parkway is surrounded by urban development it is also an important movement corridor for wildlife and there is not another contiguous greenbelt in the Sacramento region of the same size or magnitude.

“Riparian scrub in a sub-category of valley foothill riparian in this analysis.”

- It is not appropriate to combine riparian forest and riparian scrub habitats to describe the environmental baseline as different wildlife species are associated with forest habitats and scrub habitats.

“SRA habitat was a distinct habitat type described in section 3.6 ‘Vegetation and Wildlife’ in the 2016 ARCF GRR FEIS/EIR. SRA is included as a sub-category of valley foothill riparian in this analysis because it includes features from both the riverine and riparian zones.”

- The organization and discussion of SRA in this location of the document is unclear and confusing. SRA is a primary constituent element (PCE) that should be described and analyzed in the Aquatic and Fisheries sections of this document.

“Valley oak woodland is dominated by valley oak, interior live oak (*Quercus wislizeni*), box elder, white alder, Oregon ash, and black walnut. Shrubs in this habitat type include California grape, Himalayan blackberry, coyote brush, and blue elderberry. Oak woodlands are typically found on higher or upland portions of the study area than the riparian habitat discussed above.”

- California grape is referenced as a shrub, but it is actually considered a vine. It is unclear if “oak woodland” described in this section would be considered “Valley oak woodland and forest” or “Valley oak riparian forest and woodland” based on MCV classification. Valley oak riparian forest and woodland is absent from Table 4.1-1 and should be added or a rationale provided as to why it is not included. The MCV recognizes two distinct alliances: 1) Valley oak riparian forest and woodland, and 2) Valley oak woodland and forest (i.e., non-riparian). The alliances have different dominant and co-dominant species. If the former, then it must be noted that box elder, white alder, and Oregon ash are not dominant in the Valley oak woodland and forest vegetation alliance as these species are more closely associated with riparian habitats and would be found closer to the edge of the river or at lower topographic elevations.

“Within the study area, this habitat type is typically found on and around the levee slopes and anticipated staging areas, borrow sites, and disposal sites.”

- Please clarify if or how the term “study area” differs from the term “project area.” Terms are inconsistent throughout the document.

“Grasses commonly observed in the study area are foxtail barley (*Hordeum murinum* ssp. *leporinum*), ripgut brome (*Bromus diandrus*), Italian ryegrass (*Lolium multiflorum*), and soft chess (*Bromus hordeaceus*). Other grasses observed include wild oats (*Avena* spp.), Bermuda grass (*Cynodon dactylon*), and rattail fescue (*Vulpia myuros* var. *myuros*).”

- *Lolium multiflorum* is no longer the currently accepted botanical nomenclature, while this is considered a synonym, current nomenclature per Jepson eFlora, the foremost authority on the native and naturalized vascular plants of California is *Festuca perennis*. Botanical nomenclature for this species was revised with the second edition of the Jepson Manual (Baldwin, 2012). Also, the current accepted name of *Vulpia myuros* var. *myuros* is *Festuca myuros*. In the subsequent

text it must also be noted that *Conyza canadensis* is now *Erigeron canadensis*. It is important to use current accepted botanical nomenclature.

“For purposes of this classification wetlands must have one or more of the following three attributes: (1) at least periodically, the land supports predominantly hydrophytes; (2) the substrate is predominantly undrained hydric soil; and (3) the substrate is non-soil and is saturated with water or covered by *shallow water at some time during the growing season of each year* (Cowardin et al. 1979).”

- It is unclear why the definition of wetland would follow Cowardin and not the standard USACE or SWRCB definitions.

“Wetlands provide habitat for crustaceans such as fairy shrimp (*Anostraca*) and seasonal water sources for ducks, and geese. Unlike the ducks, the fairy shrimp spend their entire life cycle relying on the seasonal waters, unable to relocate if the local environment becomes disturbed or eliminated. Many migratory waterfowl use seasonal wetlands as a place to find food and rest before continuing their migrations.”

- Anostraca refers to the Order level of the scientific classification system. This is a very high level of classification and is not specific to the type of arthropods (e.g., *Branchinecta lynchi*, *Lindieriella occidentalis*, etc.) that are locally present. The life histories of aquatic arthropods cannot be compared to duck and geese. These species should have a differentiated impact analysis.

“Many bird species use riverine and open waters for resting, foraging, and escape cover. Common species include gulls, waterfowl, and osprey (*Pandion haliaetus*). Shorelines provide hunting grounds for wading birds such as herons and egrets, and for kingfisher, waterfowl, and shorebirds. Flycatchers, swallows, and other insectivorous birds catch their prey over water.”

- This statement reinforces the need to retain a pond for this variety of species. Please incorporate the information contained in The Importance of Off-Channel Ponds to Wintering Waterbirds along the American River in Sacramento: California An Initial Assessment (Airola et. al 2023) as part of the environmental baseline.

“Agricultural fields provide similar habitat to that of grasslands for wildlife but typically support lower species diversity.”

- Agricultural fields do provide habitat for similar species, but the Urrutia property provides a habitat hotspot for a wide variety of species given its unique ensemble of naturalized lacustrine, riverine, and unimpeded grassland habitats.

For invasive species the document states: “Areas dominated by non-native vegetation include abandoned, fallow, and active agricultural fields; borrow and staging areas; dredger mine tailings; levee slopes; previous construction sites; and areas subject to fire, frequent flood inundation, or scour. Invasive plants have also naturalized in nearby riparian, woodland, grassland, and

agricultural plant communities. The California Invasive Plant Council inventory is updated to identify nonnative, invasive and noxious plant species of concern.”

- The above text indicates that past construction sites are dominated by invasive non-native plant species. Several past construction sites are present in the Parkway, and this is a disturbance and maintenance issue. This highlights the fact that these constructed sites are typically not well established, which in the past has only been for a period of 3 years and are not maintained by the project proponents over the long-term though commitments were made. Introducing more of these ill-maintained sites will lead to the expansion of invasives and noxious weeds within the Parkway.

For the Wildlife Coordination Act report, the document states: “Page 113 of the ARCF GRR FEIS/EIR states: ‘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.*).’”

- The species listed in the reference are associated with the IPMP and on-going weed management activities that are implemented through Regional Parks with an MOU with American River Parkway Foundation. These weeds have not been eradicated.

For the Federal Wild and Scenic Rivers Act the documents states: “The Wild and Scenic Rivers Act applies to the parts of the Proposed Action along the American River, specifically all construction work and some staging associated with American River scour and erosion work and Contract 3B, Contract 4A, and the [Urrutia Mitigation Site]”.

- The Wild and Scenic Rivers Act is also applicable to Contract 4B. The statement above omits this fact.

“The American River Parkway Plan is the management plan for the Wild and Scenic Rivers Act. The policies of the American River Parkway Plan require that flood management agencies maintain and improve the existing flood control system and manage vegetation in the Parkway to maintain the structural integrity and conveyance capacity of the flood control system, consistent with the need to provide a high level of flood risk reduction.”

- This is a high-level summary, and it misses the policy that indicates flood control projects need to be designed to avoid and/or minimize adverse impact on the Parkway. Impacts that are unavoidable shall be appropriate, feasible, and shall be close to the site of impact unless such mitigation creates other undesirable impacts (Policy 4.10). The mitigation proposed at the Urrutia Site is not necessarily close and may be creating undesirable impacts. Additionally, in relation to bank protection Policy 4.16 calls for designs that minimize damage to riparian vegetation and wildlife habitat and the design must include revegetation that screens the project from public view, provides for a naturalist appearance and restores affected habitat. Currently,

the erosion work proposed is impacting a significant amount of vegetation and wildlife. While the designs may include vegetation, this does not necessarily screen the project from view to disguise the unnatural appearance of the revetment and may not be restoring the affected habitat values. It is critical that designs are evaluated to ensure they are the least impactful alternative specifically for Contract 3B North and 3B South in relation to the Contract 4B addition as noted in sections above. Additionally, the initial establishment and long-term maintenance and management of these sites is critical.

For the Migratory Bird Treaty Act, the document states: “Mitigation Measures VEG-1, VEG-2, and BIRD-1 would ensure the Proposed Action is in compliance with the MBTA. Generally, all survey-detected, nesting birds would be avoided with the species-appropriate buffer during construction.”

- The MBTA prohibits the direct loss of birds, nests, or eggs, regardless of if the nest was detected or not.

As for the Clean Water Act of 1972: “The CVRWQCB administers Section 401 of the CWA in California, and either issues or denies water quality certifications.”

- The above is incorrect and misleading as written. More accurately, the State Water Resources Control Board and the Regional Water Quality Control Boards have the authority to regulate these discharges under section 401 of the CWA and the Porter-Cologne Water Quality Control Act (Porter-Cologne). There are nine regional water quality control boards that exercise rulemaking and regulatory activities by basins. The project falls under the jurisdiction of the Central Valley RWQCB. The regulatory setting contains basic errors.

“USACE obtained a Programmatic CWA 401 water quality certification (Order No. 5A34CR00819) on July 13, 2021, for the ARCF project. Each individual project will request coverage under this overall permit and this permit will expire July 12, 2026.”

- It would be helpful if this Programmatic permit were attached. Will this permit cover the activities at the Urrutia Mitigation Site? Will it need to be amended? Or are the activities at this site worthy of a stand alone permit?

“The Proposed Action would require discharge of fill material into waters of the United States, therefore a Section 404(b)(1) analysis will be conducted on the project’s alternatives and included in the Final SEIS/SEIR. The discharge of fill material would comply with the 404(b)(1) guidelines with the inclusion of appropriate measures to minimize pollution or adverse effects on the aquatic ecosystem.”

- Filling the wetland would most certainly impose an adverse effect on aquatic ecosystem in all regards from the bottom-up food web to the avian and terrestrial species that rely on it for habitat when this deep-water habitat is so scarce within American River Parkway and the region. What is the proposed mitigation for the loss of 55-60 acres of open water? This SEIS/SEIR indicates varying acreages for the pond. What will be used for the 404(b)(1) analysis? How will the lack of alternatives be handled?

“O&M will include strategies for invasive species management. Efforts require continuous collaboration across USACE and with Federal, Tribal, State, and local governments, non-government organizations, and partners.”

- To date, USACE has not coordinated with Regional Parks in regard to this policy, nor have they discussed or coordinated long-term maintenance with Regional Parks. There have been a lot of assumptions made throughout this document when it comes to long-term maintenance and management.

“These resources provide a comprehensive overview of the vegetation that exists within the project area and were used to evaluate the impacts of the Proposed Action and project alternatives,”

- Only field-based, project-specific vegetation mapping can provide comprehensive detail of the resources present. The preceding text does not indicate that site-specific recent surveys were completed for the areas evaluated in this document and therefore the environmental baseline is incomplete.

“Table 4.1-3 presents habitat impact acreages of the CEQA Proposed Action in comparison to what is stated in the ARCF GRR FEIS/EIR and Table 4.1-4 presents habitat impact acreages of the NEPA Design Refinements in comparison to what is stated in the ARCF GRR FEIS/EIR.”

- Specific references to the ARCF GRR FEIS/EIR should be included in this document to facilitate review by the public and Responsible and Trustee Agencies.

Table 4.1-3 identifies 125.13 acres of habitats at [Urrutia Mitigation Site] (page 781). The acreage of the site is reported elsewhere in the document as 99.74 (Table 4.1-2) (page 771).

- Please identify the correct total acreage of the Urrutia Site and the habitats present. It is unclear from the document what the environmental baseline is given the discrepancies and inconsistencies throughout the document.

Table 4.1-3: “Note: [Urrutia Mitigation Site] and SRMS would emphasize restoration to native floodplain wetland and riparian habitats. It is anticipated that there would be a large net increase in freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats, while a reduction in grassland/upland and pond habitats would occur (HDR 2023), resulting in a gain in aquatic resource area and functions.”

- The note does not acknowledge the existing habitat value nor aquatic resources values that the open water or upland grassland presently provides. The statement presumes that the open water is of lesser value yet provides no basis for this conclusion that the loss of 55-60 acres of open water would result in aquatic resource values. Further, it must be acknowledged that riparian woodland habitat will take many years to establish and provide ecological value. The aquatic resource functions of the existing pond and the proposed mitigation habitats should be described, disclosed, and evaluated in this document. Also note that the reference HDR 2023 was not made

available to the public. The same comment above applies to the Note at the bottom of Table 4.1-4. The HDR 2023 document should be provided.

For the No Action Alternative, the document states “However, this measure would also incorporate mitigative features through the installation of plantings on the surface of the trench. Once the vegetative features reach full growth, the rock trenches would provide a natural appearance to the site and the affected habitat values would be fully restored.”

- The document should identify the time required for the “vegetative features” to “reach full growth” and be “fully restored.” Further, if the launchable rock trenches are triggered, all plantings would also fail, and the area would again be absent vegetation and be an unplatable slope of rock. How is this considered appropriate mitigation?

“However, because the project sites are located within larger corridors of similar habitat, this would not result in a substantial overall habitat reduction.”

- This statement does not acknowledge that pond/lacustrine off-channel habitat present in the Parkway is an uncommon habitat present on the landscape and therefore the conclusion of Less than Significant with Mitigation Incorporated is unfounded. It should also be recognized that the corridor these sites would adjoin with has already undergone extensive bank protection and habitat loss that has left it denuded of vegetation.

For the Proposed Action 4.1-a and 4.1-b (CEQA Impact Conclusion 4.1-a and 4.1-b: Less Than Significant with Mitigation Incorporated): “Following project completion, a vegetation management plan consistent with the Habitat Mitigation, Monitoring, and Adaptive Management Plan developed for the ARCF GRR FEIS/EIR and internal guidance would be developed and implemented in coordination with USFWS and NMFS. In addition, the Proposed Action would follow updated 2023 USACE Invasive Species Policy Guidance in fulfillment of Section 501 of WRDA 2020. Invasive plant species incursions would be controlled as early as possible to prevent wide-scale establishment and minimize control efforts such as pesticide usage. Implementing the vegetation management plan, which would be consistent with the Habitat Mitigation, Monitoring, and Adaptive Management Plan developed for the 2016 ARCF GRR FEIS/EIR, would ensure that native riparian plantings installed within the planting benches are protected, managed, monitored, and maintained for a period of 3-5 years following installation and ensure that they are on an ecologically sustainable trajectory.”

- Regional Parks should be consulted during this process as this document covers several proposed projects/actions that occur in the Parkway, which is managed by Regional Parks. The establishment should be a minimum of 5 years, especially for replanted bank protection sites as we have seen an enormous difference between sites that were abandoned after 3 years and sites that were maintained and monitored for a minimum of 5 years. Three years of monitoring is also insufficient and should occur for an extended period of time. There should also be a long-term management plan for the site which is prepared in collaboration with Regional Parks.

“None of the bank protection sites are anticipated to support wildlife nursery sites, but the onsite plantings would provide suitable habitat for nesting by a variety of native and migratory bird species.”

- The bank protection sites should be surveyed by a qualified ornithologist for rookery sites as several are known to exist in proximity of bank protection sites.

“Disturbance distance from the bald eagle at the [Urrutia Mitigation Site] would be enforced during nesting season with a biological monitor onsite if work is occurring within the 660-foot buffer. The nest tree would not be removed as part of the project. [Urrutia Mitigation Site], once mature, would provide rearing habitat for juvenile salmonid and steelhead in the first 2 miles of the American River as well as multistory vegetation that could be used as nesting or stop over habitat for birds.”

- The logic above does not consider the site factors present at Urrutia that have allowed for the eagles to select the Urrutia location as a (successful) nesting site. Site selection factors for nesting is likely to include proximity to the American River and an off-channel pond that supports hunting opportunities for the eagles as both fish and waterbirds are prey items for eagles. Given that there are no other eagle nests in the Parkway, other than near Nimbus, additional analysis should be provided for the justification that the removal of the pond and replacement of open water habitat with riparian scrub and trees would not adversely impact the nesting location of the eagle pair. The analysis presented does not consider the types of birds that presently use the deep open-water pond, such as diving ducks and other waterbirds, and that conversion to riparian scrub/woodland habitats would not be suitable habitat for these species. A qualified ornithologist with demonstrated experience monitoring bald eagles and approved by both USFWS and CDFW should monitor the nest and construction activities if work occurs during the nesting season, regardless of the 660-buffer. The nesting season for eagles should be stated since the adults return to the nests in late fall, and it should be indicated when monitoring would begin. Animals have different tolerances for disturbance and the activity at Urrutia is significant in terms of habitat type conversion. Having a bald eagle nest in the Parkway is and is an indicator of ecosystem health and heterogeneity. To impact their ability to continue to be successful either by causing them to flee from construction activities or changing habitat conditions in a way that no longer supports their security or provides opportunities for foraging would be unacceptable. It should be noted again that numerous waterbirds utilize the pond to feed on the fish in the pond. Regional Parks staff personally observed a feeding frenzy associated with hundreds of cormorants and other waterbirds feeding in the pond in winter of 2023. While the proposed mitigation habitat could support nesting and stop over habitat for species that prefer riparian vegetation this will not replace the existing values that would be eliminated.

“Tree removal and trimming, minor grading, paving, and adding aggregate base could occur at staging areas and along haul routes. Staging areas and haul routes would be restored to pre-project conditions. This may include reseeding with native grasses and forbs, planting with native vegetation, or working with recreational agencies to determine which trees would be removed and replanted.”

- Tree trimming should be conducted by or overseen by an ISA certified arborist or a qualified tree pruning specialist who agrees in writing to perform pruning in accordance with ANSI A300 Tree Care Standards for pruning. Tree removal is an important issue in the Parkway. Regional Parks requests that all trees proposed for removal be identified in the environmental document along with identification to species and size reported as diameter at standard height (DSH = 4.5 ft above grade). Additionally, tree roots should be properly protected by putting down mulch in areas where vehicles would be driven to reduce soil compactions and removing the mulch when construction is complete.

“Grading, other ground-disturbing activities and temporary fencing for public safety could temporarily disrupt wildlife movement but would not completely block movement pathways or migratory corridors. Most wildlife species are anticipated to continue to move to and through adjacent unaffected habitat away from active construction activities during construction. Effects of the project on access of these species to the affected habitat areas would be temporary and these species would be expected to return to areas affected by construction once such work is completed. Noise from construction of the Proposed Action could temporarily alter the foraging patterns of resident wildlife species but is not anticipated to substantially interfere with foraging.”

- The Proposed Action would permanently interfere with foraging for species that rely on the unimpeded grassland and deep-water pond at Urrutia. It would also permanently impact the nesting, foraging, and basking habitat that supports the turtle population at Urrutia. Additionally, the proposed mitigation at the Urrutia may impact the nesting bald eagles at the site since the habitat will be converted to other habitat types that may not be a suitable for supporting the requirements that originally led them to select the site.

“Night work has the greatest potential to disrupt wildlife movement, because many species are most active at night when disturbance levels are lowest. Consecutive nights of construction activities with high levels of noise, lighting, and visual disturbance could have a substantial but temporary adverse effect on the movement of some wildlife. Implementing Mitigation Measure VIS-2: “Minimize Disturbance to Wildlife from Nighttime Lighting”, which was previously adopted for the ARCF 2016 Project, would reduce Impact 4.1-a to less than significant”.

- The Central Valley has lost over 95 percent of native grasslands, riparian habitat, wetlands, and vernal pools greatly reducing populations of birds and wintering waterbirds (Eric Ross 2024). The document has not identified the species nor discussed the impacts on wildlife movements that could be impacted by nighttime work. Nighttime work with artificial lighting would negatively impact Parkway resources and should be avoided in accordance with the ARPP and the NRMP. The analysis 1) only considers the impact of nighttime construction on wildlife movement, 2) does not consider the impact of daytime construction in a narrow urban greenbelt that also serves as a wildlife movement corridor, and 3) does not analyze how the loss/conversion of the pond at the proposed [Urrutia Mitigation Site] location would interfere with the diurnal movements of wildlife, specifically waterbirds.

“The mitigation sites would disturb existing vegetation in the short term with construction activities, noise, human presence, vegetation removal, grubbing and grading of the landscape. However, once

completed they would provide more habitat for migratory birds and higher functioning habitat for fisheries. Mature mitigation sites would connect habitat fragments, encourage additional food production, and overall add valuable habitat to a highly impacted migratory corridor. [Urrutia Mitigation Site] is currently operated as a sand and gravel business, so post project conditions would have less disturbance than the current use.”

- The assertion that there would be “more habitat for migratory birds” is false since the habitat would be different and the species would be different. The statement does not consider the limited resource of deep, open-water habitat in the Parkway and the bird species that presently use the pond as habitat. If the goal were to create more habitat for more species of migratory birds, then the project proponents would legitimately consider preservation of a substantial pond. The Parkway is a Wild and Scenic River and the assertion that the Parkway is a “highly impacted migratory corridor” is not an accurate assessment of the baseline condition. It is becoming a ‘highly impacted migratory corridor’ due to the overwhelming amount of construction and habitat removal that has occurred. The value of the Parkway resources is not recognized, and the analysis is brief and lacking and the conclusions that follow are non sequitur. Furthermore, Urrutia has not been operated as a sand and gravel mine for years, but the previous owner did operate a business associated with selling topsoil and sand after mining ceased.

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Tables 4.1-3 and 4.1-4 identify impacts of 14.53 acres of valley foothill riparian habitat at [Urrutia Mitigation Site] site.

Table 4.1-2 identifies that the Riparian Forest/Scrub habitat is composed of “composed of Native and nonnative scrub and woodland.”

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- It is unclear what MCV vegetation assemblage these generalized vegetation communities represent. It is unclear if these are CDFW Sensitive Natural Communities.

Page 4.1-17 identifies the reference for CDFW Sensitive Natural Communities as CDFW 2022.

- This reference is outdated. The most current list is dated June 1, 2023. The analysis should be based on the most current regulatory information and standards and the best available current science.

Please revise to clarify that the impact discussion for this site follows on 4.1-38, as presently laid out, it is unclear if the Urrutia Site was considered or that an impact discussion was prepared for this site. This analysis should clearly present the number of trees, species, size (i.e., diameter) and acreage of canopy to be removed. Instead, the text associated with Impact 4.1-c contains statements, such as “Some waterside trees would be removed due to the topography and location of the erosion protection features.” Elsewhere the document notes that up to 65 acres would be removed along the American River under the ARCF GRR FEIS/EIR and states that “to date 33.14 acres has been removed under American River Erosion Contracts 1, 2, and 3A” (p.4.1-32) Using basic math, the reader has to conclude that 39.82 acres of riparian habitat would be removed by bank protection projects implemented under the current SEIS/SEIR. The document does not clearly disclose the amount of tree removal/riparian habitat removal and should be revised. These acreages are limited to erosion contracts and do not consider that Tables 4.1-3

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and 4.1-4 also identify 14.53 acres of additional impact to valley foothill riparian habitat at the Urrutia Site.

The document states on page 4-192: “American River Erosion Contracts 1, 2, and 3A have already impacted 33.14 acres of riparian habitat; thus, the total impact for American River Erosion contracts of 73 acres is above the 65 acres of impact that was estimated in the ARCF GRR Final EIS/EIR.”

- As described above, the erosion protection proposed action impacts to Valley Foothill Riparian would total 39.82. The above text suggests 73 acres would be removed and this is above the impact analyzed in the ARCF GRR EIS/EIR (2016). However, the document does not account for the vegetation impacts of 14.53 acres at the Urrutia Site as enumerated in Tables 4.1-3 and 4.1-4. The total removal of riparian forest/scrub is therefore calculated to be 87.49 acres. The document lacks a clear presentation of impacts to riparian habitat.

As presently noted in the footnote of Table 4.1-2 Riparian Forest/Scrub is an amalgamation of “native and non-native scrub and woodland.”

- Riparian Forest/Scrub is not an alliance, group, nor other tier of the National Vegetation Classification hierarchy that the MCV is based upon. The SEIS/SEIR uses the term “Riparian Forest/Scrub” in impact tables, grouping the habitats in an unknown manner described on pages 4.1-14 through 4.1-15.
The term used in the SEIS/SEIR of “Riparian Forest/Scrub” appears to be loosely based on the “Preliminary Descriptions of The Terrestrial Natural Communities of California” but is not consistent with the aforementioned text either as there is no element named riparian forest/scrub. Further, while this document is available on-line, it is noted as being superseded by MCV under Section 1940 of the Fish and Game Code. The superseded version of the “Preliminary Descriptions of The Terrestrial Natural Communities of California” clearly states that the MCV “should be used when describing existing conditions in environmental documents, assessing impacts, and mapping vegetation.” The SEIS/SEIR did not complete vegetation mapping to the state standard in electing to use a vegetation classification system that appears to be unique and not consistent with the hierarchical classification established by the MCV. For reference, please see: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=75893>
- It is critical that the vegetation be classified based on the MCV so that mitigation can be appropriately implemented. Valley oak riparian forest and woodland as defined by MCV is a distinct vegetation assemblage. It would be inappropriate to mitigate the loss of this habitat type with a sandbar willow thicket, for example. This would be considered out-of-kind and is not an acceptable mitigation strategy.

“The analysis in the ARCF GRR FEIS/EIR determined that even with waterside planting benches and retaining IWM to the extent practical, effects on sensitive natural communities would remain because of the lag time between planting vegetation and maturing to a functionally equivalent point. Once the plantings become established, they would provide riparian habitat that is expected to be of higher quality than existing habitat. Habitat features that benefit native species would be included in the design, and the sites would be managed for the establishment and persistence of native trees,

shrubs, and herbaceous plants. Over the long-term, the Proposed Action would not substantially reduce the quality or quantity of riparian habitat, despite the temporary habitat loss.” (p. 4.1-33)

- It should be explained how and why mitigation plantings would offer higher quality habitat than the existing habitat on site at Contract 3B North, 3B South, and Contract 4B. An explanation for this conclusion is not presented in the document. The document does not clearly state what the vegetation composition of the existing vegetation community is, what the age structure of the forest is, nor the size classes of the trees in the forest. These are important elements of describing the existing conditions. Asserting that the mitigation would be “higher” or better quality is unsubstantiated in the text of the SEIS/SEIR and in direct opposition to scientific research. Scientific research has been conducted to understand the restoration trajectory of anthropogenically planted forests. Little (2007) surveyed trees and shrubs in restored and reference forests in 2006 to understand if the stem size and species composition differed 10 to 15 years after forests were planted. She found that since both early and late successional species were planted in Sacramento River restoration sites, the sites did not reflect any particular natural plant community and essentially comprised a novel ecosystem. Additionally, restored forests had similar biomass to reference forests, but had higher stem density of smaller trees and shrubs (Little, 2007; Matzek et al., 2016). References are offered below. This is not an exhaustive list of references. Claims that areas replanted as mitigation are “higher” in quality compared to the existing intact forest are unsubstantiated in this document.

Little, C. (2007). Vegetation and Environment Relationships in Restored and Remnant Riparian Forests on the Middle Sacramento River, California. California State University, Chico.

Matzek, V., Warren, S., & Fisher, C. (2016). Incomplete recovery of ecosystem processes after two decades of riparian forest restoration. *Restoration Ecology*, 24(5), 637–645. <https://doi.org/10.1111/rec.12361>

“Therefore, the long-term impact of the Proposed Action on riparian habitat would be less than significant with mitigation”.

- The SEIS/SEIR states "Overall, the Proposed Action would cause significant and unavoidable short-term adverse impacts to riparian habitat" (p. 4.1-33), *yet the conclusion is "less than significant with mitigation."* While the document does acknowledge a “lag time” it does not define the time that would be required for a forest planted for mitigation purposes to be of “higher” quality than the existing forest. Nor does the document attempt to quantitatively nor qualitatively describe the value of the existing forest yet makes the assertion that the replacement mitigation forest is somehow of “higher” quality. There are tools, such as iTree, that can be used to calculate the functions and value of both of trees in terms of carbon storage, avoided runoff, pollution removal, and calculates the replacement value. This can be completed for individual trees and populations of trees. This is a powerful tool for analysis. Regional Parks requests that data be provided to substantiate the claim that mitigation forests are of “higher” quality and Mitigation Measure VEG-2: “Project designs will be refined to reduce impacts on vegetation and wildlife to the extent practicable. Refinements implemented to reduce the loss of riparian habitat will include reducing the impact footprint, constructing bank protection rather than launchable

rock trench whenever feasible, and designing planting benches. Where practicable, trees will be retained in locations where the bank protection and planting benches are constructed. Trees will be protected in place along the natural channel during rock placement.”

- Engaging an ISA certified arborist could help reduce tree impacts as an arborist can help develop appropriate mitigation to reduce the impacts to trees and evaluate the risk a tree poses. Arborists were actively engaged in early work along the Sacramento River, and it is not clear that the same expertise was engaged in the current planning efforts. It is unclear what is intended by “Trees will be protected in place along the natural channel during rock placement” but tree roots require oxygen, and the impact of this action should be evaluated by a qualified ISA certified arborist. Compaction of soils, reduced oxygen diffusion into the soil from rock armoring, changing grade, and burial of the root crown are all factors that lead to long-term decline in trees. “The short-term significant impacts of riparian habitat loss would be minimized by retaining and protecting trees where possible, but the impact would remain significant and unavoidable because of the extent of required riparian vegetation removal.” The extent of tree removal should be quantified in terms of the number of trees removed and the amount of canopy acreage. Trees identified for removal should be identified to species and size (DSH) and this should be disclosed to the public. Better coordination of the projects, using coir fabric to stabilize slopes until vegetation has established and reducing the amount of rock/cobble lining at bank protection sites would reduce the impacts and promote more favorable conditions for revegetation. Trees to be retained should not have their root systems armed with rock, but rather coir fabric would be much less impactful in the short and long term.

“The habitat restoration at [Urrutia Mitigation Site] would be designed to consider historical site conditions and adapt existing conditions to restore, enhance, and maximize habitat for three focal species: salmonids, yellow-billed cuckoo, and VELB.”

- The historical site conditions are a small flowing creek with associated ponds and upland grassland. This is not what is proposed at Urrutia. Furthermore, complete loss of the grassland and pond is not “adapting existing conditions” it is full-scale habitat conversion. The statement above does not acknowledge the existing resources at Urrutia or the unique habitat values that the pond provides to wildlife, specifically waterbirds in the Parkway. Deep-open water habitat is not a common habitat type on the landscape and this area provides unique habitat and opportunities for education and interpretation that are not available elsewhere in the Parkway. The statement above focuses on three species to the exclusion of the wildlife species that presently utilize the site. The project partners are advised to consider the bird data and counts that have been conducted for years by the Audubon Society.

“Neither mitigation site has other sensitive natural communities identified in local or regional plans policies, regulation. The American River Parkway Plan and Natural Resource Management Plan both recommend naturalizing the area around the [Urrutia Mitigation Site], which the project would achieve”.

- The NRMP identifies that that a conceptual naturalization plan for Urrutia should be developed if it is brought into public ownership and the plan “should include the removal of rubble and restoration of the bank line in consideration of current and future conditions” and refers the reader to the ARPP. The NRMP also indicates that the Urrutia pond is an incredibly important

habitat for waterbirds. The proposed project does not recognize the existing values, does not include removal of rubble from the bank line, and the conversion of the limited habitat types in the area does not speak to a balanced management approach or natural resource protection as called for in the goals and policies of the ARPP. The proposed mitigation goes above and beyond what has been contemplated or envisioned for this site as identified by the Area Plan specific policies associated with a maintained pond.

“[Urrutia Mitigation Site] would emphasize restoration to native floodplain wetland and riparian habitats, consideration of river dynamics, and adaptive management of the features as described in the Parkway Plan and NRMP. In the post-project condition, it is anticipated that there would be a large net increase in freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats, while a reduction in grassland/upland and pond habitats would occur (HDR 2023). This would be considered the re-establishment of a former aquatic resource, resulting in a gain in aquatic resource area and functions, which does not require mitigation. With implementation of Mitigation Measure WATERS-1, which was previously adopted for the ARCF 2016 Project, the long-term impact would be less than significant.”

- Development of the Urrutia Mitigation Site would directly impact 2.5 acres of wetlands and 55.4 acres of open water as shown in Table 4.1-3. The analysis for a less than significant with mitigation statement is not substantiated by the above text. The ecological functions and values of the Urrutia pond have not been identified in the document and have therefore have not been evaluated. The absence of an appropriate environmental baseline coupled with fallible logic invalidates the conclusion.
- If developed as a mitigation site, there would be a loss of deep, open water pond habitat— a habitat type that is uncommon in the Parkway and that offers unique habitat values for waterbirds and recreational opportunities not found elsewhere in the Parkway. Arden Pond and Bushy Lake are also open water habitats in the Parkway, however the depth of the Urrutia Pond and the numbers and diversity of waterbirds documented at the Urrutia Pond should be evaluated and disclosed in the document.
- It must also be noted that under the Proposed Action the pond would not be “reduced” as the text indicates, but rather eliminated. The text should plainly state that if the Proposed action is implemented there would be zero pond acreage at the Urrutia Mitigation Site. Although perennial riverine habitat would be created, the document does not acknowledge the habitat and ecological functions and values that the pond presently provides nor the wildlife that the pond presently supports—nor the ponds value as off-channel night roosting habitat for waterbirds. This is a critical habitat type for migrating birds and if lost, does indeed also invalidate the CEQA and NEPA conclusions for Impact 4.1-a.
- Although the pond is the result of man-made activities (i.e., mining), a lake previously existed on the landscape and is evident on the hand drawn topographic maps in the California State Lands Commission on-line map collection (Fresno State 2024). Therefore, it is not appropriate to conclude that the restoration as proposed under the Proposed Action would restore the area in a manner more consistent with the pre-development landscape of the Sacramento region.

- It is not clear how this action would contribute to adaptive management of the Parkway nor what specific features this sentence is referring to. To be consistent with the ARPP the action should propose a balanced approach to ecosystem management. Historically, Urrutia property has primarily been upland associated with the American River with a drainage and associated small ponds. The proposed project at the Urrutia Site would convert the “man-made pond” into frequently inundated floodplain and is not restoring the site to historical conditions. This language is vague and dismissive and does not identify specific impacts, actions, wildlife habitat values, or ecosystem services that would be altered or augmented by the proposed action.

The following text is repeated on numerous occasions in the document: “In the post-project condition, it is anticipated that there would be a large net increase in freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats, while a reduction in grassland/upland and pond habitats would occur (HDR 2023).”

- This statement extracted from the source document and repeated multiple times and the HDR 2023 document should be included as an appendix to the document since the SEIS/SEIR document relies heavily on this document to substantiate the conclusion statements in the SEIS/SEIR.

“With implementation of Mitigation Measure WATERS-1, which was previously adopted for the 2016 ARCF Project, this impact would be less than significant.”

- Although USACE does not issue Section 404 CWA permits to themselves for actions undertaken in waters of the United States for USACE-projects, the agency must conduct a 404(b)(1) analysis. The document indicated that that the 404(b)(1) analysis would be provided as part of the FSEIS/SEIR. Please describe how the conversion of scarce deep, open-water pond habitat in the Parkway will be established as the LEDPA.

“The American River Parkway Plan states, in Policy 4.12, that “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.”

- The Sacramento County Tree Preservation Ordinance requires “A Tree Pruning or Tree Removal Permit...to prune or remove any public tree and certain private trees.” Project Partners would include Sacramento County tree removal work to ensure compliance with county ordinance.” However, the Director of Regional Parks has authority over tree removal in the Parkway, but the text does not acknowledge this fact.

“With the on-site replacement of riparian habitat, the Proposed Action would ensure that there would be no net impacts on lands designated by the American River Parkway Plan as Protected Areas or Nature Study Areas. Although an initial loss of riparian habitat within the Parkway would occur, this impact would be minimized by implementing Mitigation Measure VEG-2, which was previously adopted for the ARCF 2016 Project, and eventually the Parkway would experience a net

increase in the extent of riparian habitat. This long-term increase in riparian vegetation is consistent with Terrestrial Resource Policy 3.2 of the Parkway Plan, which calls for the protection, enhancement, and expansion of the Parkway's native willow, cottonwood, and valley oak–dominated riparian and upland woodlands that provide important SRA, seasonal floodplain, and riparian habitats. Consequently, the impact of the CEQA Proposed Action and NEPA Design Refinements on local conservation plans, such as the Parkway Plan, would be less than significant.”

- It is unclear how VEG-2 is applicable to Urrutia Mitigation Site as this is a mitigation site and the impacts to riparian vegetation would be 14.53 acres.
- Although pond retention alternatives were carried forward under CEQA, the document does not identify the impact or consequence of eliminating these alternatives for consideration under NEPA. This should be placed in clear language for the public.
- Per OPR (2014), the “Analysis of an agency’s alternatives, including the proposed action, are ‘the heart of the environmental impact statement’ (40 C.F.R. § 1502.14). NEPA regulations require an agency to ‘rigorously explore and objectively evaluate all reasonable alternatives’ (40 C.F.R. § 1502.14(a)), to devote substantial treatment to each alternative (40 C.F.R. § 1502.14(b)), to identify the preferred alternative where one or more exists (40 C.F.R. § 1502.14(e)), and to present the environmental impacts of the proposed action and the alternatives in comparative form to sharply define the issues and provide a clear basis for a choice among alternatives by the decision maker and the public. Other requirements include:
 - Providing a “no action” alternative (40 C.F.R. § 1502.14(d));
 - Explaining why any alternatives were eliminated from detailed analysis (40 C.F.R. § 1502.14(a));
 - Identifying the environmentally preferred alternative (40 C.F.R. § 1502.14(e)).”
- Based on the above, the heart of the environmental impact statement is weak and the standard to “rigorously explore and objectively evaluate all reasonable alternatives” has not been fulfilled based on the false rejection of alternatives for the NEPA analysis captured above. Also, it is noted that having the analysis done for the alternatives under CEQA is meaningless if the only projects that will ultimately be considered are the two alternatives captured under NEPA (proposed action and no action).

“Alternative 4a would result in impacts to the bald eagle nest onsite.”

- The configuration of the perennial channels could be modified in Figure 3.7.1.-1 to avoid the eagle tree and retain a pond that is of sufficient size and with the appropriate distance from the edge to preserve deep, open water habitat for night roosting waterbirds. Alternative 4b would retain a portion of the pond but the size is no longer suitable for night roosting by waterbirds and therefore would also result in the loss of an uncommon habitat type (deep, open water pond) in the Parkway. It is assumed that the proposed action construction activities within the buffer would occur outside of the nesting season. Likewise, construction of a berm within or near the buffer could also occur outside of the nesting season. The impacts to the eagle nest are no different between alternatives and as indicated above a genuine attempt to consider a pond would have resulted in refinements to the 4a alternative since the project partners actually had this alternative in January 2022. The analysis is inadequate and flawed.

“Relying on Alternative 4a or 4b would require additional mitigation be constructed elsewhere in the parkway, or that credits be purchased from an approved mitigation bank.”

- It is unclear why these reasons would eliminate Alternative 4a and 4b from consideration under NEPA since the rationale of eliminating these from detailed analysis (40 C.F.R. § 1502.14(a)) is not documented in the SEIS/SEIR. Further, the original EIS/EIR discusses the ability to purchase bank credit in the event there was not sufficient lands in the Parkway, so this option is still available. There are numerous reasons provided for rejecting these alternatives under NEPA but as established above they are not viable reasons. This includes the false mandate that you must satisfy all of the project mitigation needs at a single large site within the Parkway. The general approach related to the mitigation proposed at the above mitigation should not cause undesirable impacts within the Parkway.

“CEQA: Impacts to fish and wildlife migration and movement would be minimal and are not anticipated to affect use of migratory corridors or nursery sites.”

- Additional evaluation of conclusion of LTS is required based on minimal discussion provided. Stating that the impacts are minimal does not make it so. A true analysis is required. There is plenty of evidence to suggest that the conclusion is incorrect.

“CEQA: Impacts on plant and wildlife habitats and populations would be minor in the short term and no effect for most species in the long term.”

- Additional evaluation of conclusion of LTS is required based on minimal discussion provided.

“CEQA: Similar to the Proposed Action, these alternatives would include the restoration of riparian habitat but would also retain freshwater habitat.”

- Additional evaluation of conclusion of LTS required based on minimal discussion provided.

“CEQA: Similar to the Proposed Action, these alternatives would include the restoration of riparian habitat but would also retain freshwater habitat.”

- Additional evaluation of conclusion of Less than significant short-term, no effect long-term required based on minimal discussion provided.

“CEQA: Similar to the Proposed Action, these alternatives would include the restoration of floodplain channel habitat but would also retain freshwater habitat.”

- Implementation of WATER-1 for the Proposed Action and the Alternatives should be evaluated further as it is unclear that there would be no net loss of waters of the United States/waters of the State. The document fails to identify and disclose that historically a lake existed in the landscape as documented in the State Lands Commission Map Collection (Fresno State 2024).
- The document should clearly identify how the elimination of 2.5 acre of wetland and 55.4 acre of open water habitat that has a subsurface connection to the American River, which is a tidally-influenced and navigable water of the United States subject to Section 404 of the CWA and

Section 10 of the Rivers and Harbors Act of 1899 does not require mitigation for the loss of these features.

“CEQA: Similar to the Proposed Action, Alternative 4a and 4b would impact riparian habitat prioritized for protection in the American River Parkway Plan but would result in an overall increase in riparian and other high-priority habitats.”

81

- It is unclear how Mitigation Measure VEG-2 reduces impacts to a less than significant level for the Urrutia Mitigation Site (Proposed Action and Alternatives 4a and 4b). VEG-2 in part reads, “Project designs will be refined to reduce impacts on vegetation and wildlife to the extent practicable.” Impact reduction should be considered as part of the planning, design, and engineering process and should not be deferred as mitigation. This demonstrates that the planning, design, and engineering process is incomplete and that the mitigation.
- The document should clearly identify the habitats that are considered “other high-priority habitats.”

“Waters of the state include all surface water and groundwater, including saline waters, within the State’s boundaries. The RWQCBs have discretion to take jurisdiction over areas not Federally regulated under Section 401, provided they meet the definition of waters of the State. Mitigation requiring no net loss of wetlands functions and values of waters of the State is typically required by the RWQCB.”

82

- The pond on the Urrutia property is likely to be considered waters of the State.

“While monitoring may be conducted by others, it is the responsibility of SCRCP to coordinate and integrate any monitoring efforts into the monitoring and reporting associated with the NRMP (SCRCP et al 2023). Because the [Urrutia Mitigation Site] fall under the umbrella of the NRMP and its goals, SCRCP is an appropriate entity to plan, manage, delegate, and/or coordinate the monitoring of the onsite [Urrutia Mitigation Site] success as per requirements for other standard conservation or mitigation bank easements. Appendix D of the NRMP includes a comprehensive monitoring plan that may be used for this purpose (SCRCP et al 2023).”

83

- Regional Parks is happy to consider taking on long-term management at the site as the mitigation site land manager. This will obviously require coordination and collaboration and after the appropriate mitigation design is approved, we would need to begin developing a specific long-term management plan for the site. This will outline the management activities, establish goals and success criteria, outline the monitoring and reporting requirements, etc., which are all necessary for starting to determine the funding needed for an endowment to manage the site. And of course, all of this would need to be done in tight coordination with USFWS and NMFS to ensure alignment and development of any additional agreements. The best way to ensure success is to ensure that the design is appropriate for the site.

“USACE will coordinate with NMFS during pre-construction engineering and design as future flood risk reduction actions are designed to ensure that conservation measures are incorporated to the extent practicable and feasible, and projects are designed to maximize ecological benefits.”

- The document should provide an update on this consultation process and state if there has been agency coordination in this document. This measure was developed as part of the ARCF GRR EIS/EIR 2016 document. It is unclear if agency coordination has occurred.

84

“Monitoring for the establishment of riparian tree and shrub species within shaded riparian aquatic habitat is expected to last approximately 5 to 8 years, not to exceed 10 years. Establishment success will be based on criteria determined on a site-by-site basis with NMFS. Once the monitoring period is complete, all vegetation maintenance and monitoring will transfer and be the responsibility of then on-Federal sponsor and local maintaining agency. USACE will continue to coordinate with NMFS during all phases of construction, implementation, and monitoring by hosting meetings and issuing annual reports throughout the construction period.”

85

- It is critical that long-term management plans are developed for all sites and that monitoring reports are submitted to Regional Parks and that final sign-off letters or emails are provided to Regional Parks. The past bank protection sites had at least one annual site tour with the resource agencies, project proponents, and Regional Parks. Establishing this in the long-term management plan will help ensure that all parties are in alignment about management and monitoring of the site. It will be important to continue to periodically monitor these sites even after the formal establishment monitoring period is complete. Often “success” at these sites begins to decline at these sites and statements have been made in the SEIS/SEIR to indicate the habitat at the bank protection will ultimately mitigate for the impacts (anticipated to actually be decades in the future).

“Although alteration of the riverbank and habitat creation could result in loss of SRA habitat and salmonid habitat, the restorative components of this portion of the Proposed Action would result in a net gain of SRA and salmonid habitat. Current programmatic level designs for [Urrutia Mitigation Site] have not been enumerated to provide quantitative data demonstrating this net gain. Detailed comparison of pre- and post-project fisheries conditions will be disclosed in the Final SEIS/SEIR.”

- It is unclear how the analysis supports a conclusion of Less than Significant with Mitigation when the text acknowledges that the design does not allow for “provide quantitative data demonstrating this net gain.” It is not appropriate to simply defer analysis to the FSEIS/SEIR. The detailed conditions and analysis need to be provided to the public and Responsible agencies prior to the final.

86

“The [Urrutia Mitigation Site] would connect an existing inactive mining pit to the American River during all flow conditions. The [Urrutia Mitigation Site] would therefore reduce the future potential for fish stranding. Fisheries”

- Fish standing is not previously discussed. This should be disclosed in the document. The document should describe how and when fish become stranded in the existing on-site pond and the conditions that have to occur for this to happen.

It is unclear how the CEQA (Less than Significant with Mitigation Incorporated) and NEPA (Short-term and Moderate and Long-term and Minor Effects that are Less than Significant with Mitigation Incorporated) conclusions are reduced to Less than Significant with Mitigation Incorporated with the implementation of WATERS-1.

87

- WATERS-1 (p. 4.1-41/799) states, “Mitigation may be accomplished through habitat replacement, enhancement of degraded habitat, off-site mitigation at an established mitigation bank, contribution of in-lieu fees, or other methods acceptable to the regulatory agencies, ensuring there is no net loss of waters of the United States.”
- How is the loss of the 55-acre pond mitigated? Is the presumption that the pond is “degraded habitat”? The SEIS/SEIR has not described the environmental baseline at the Urrutia Mitigation Site, and it does not appear to mitigate for the loss of the 55-acre pond. The existing pond is a deep open water habitat. This type of habitat is uncommon and scarce in the Parkway and offers unique recreational values, as well as wildlife viewing opportunities. The document has not acknowledged that the pond serves as an important habitat for migratory waterbirds.

As noted previously, it is unclear why Alternatives 4a and 4b were advanced under CEQA only. These alternatives need to be evaluated under NEPA.

“Unlike the [Urrutia Mitigation Site], Alternatives 4a and 4b would not remove the existing stranding hazard posed by the man-made pond, and the existing risk of stranding fish in the retained portion of the pond as water recedes across the floodplain following high-water events would remain. Consequently, the presence of the pond at the completed restoration site reduces the overall habitat mitigation value of the project in regard to salmonids, as the potential stranding of fish in the pond as water recedes creates a population “sink” (recurring loss of individuals in a population due to a single cause).”

88

- The pond does represent an existing but infrequent stranding risk for fish. Both of the pond alternatives would reduce the stranding risk by reducing the size of the pond. There is also currently no fish habitat available at the site so there is currently no value for fish. The creation of fish habitat at the site will be an instant boost for fish by whatever acreage is created. The conclusion that the newly created fish habitat, where there was not before, somehow having a lower value appears to be “a glass half-empty” or an “all or nothing” perspective.

“See the end of this appendix for the complete species lists.”

89

- This reference is confusing and arbitrary. The species lists are not at the end of Appendix B. The species lists are provided in Appendix D of the file ARCF_Draft-SEIS-SEIR_Appendices_Dec2023. The document should contain clear and accurate references to facilitate public and agency review.

“USACE has reinitiated consultation on the ARCF project under ESA Section 7.”

- Impacts are not clearly disclosed in the document, please explain if USFWS and NMFS have information on species impacts that are not provided in the SEIS/SEIR.

90

Table 4.3-1. Special-status Species with the Potential to Occur in the Project Area

- Monarch Butterfly listing status is incorrect. Species is a federal Candidate. Species is lacking a status under CESA.
- Table should acknowledge northwestern pond turtle is known to occur (present) along the Contract 3B Sites.
- Table should acknowledge Swainson’s hawk known occurrences along the American River project sites. The table should be consistent with the text on page 4.3-14 which discusses SWHA nest locations along the American River.
- Footnote indicates that CNPS data was run on January 12, 2021, and USFWS IPac List generated March 8, 2023. New database queries should be included in the document to support the environmental baseline and conclusions of the document. The CNPS data is over 3 years old at this time and the USFWS database was queried months ago.

“The full CNDDDB and CNPS records are available at the end of this appendix.”

- The species lists are provided in Appendix D of the file ARCF_Draft-SEIS-SEIR_Appendices_Dec2023. The document should contain clear and accurate references to facilitate public and agency review.

Both Table 4.3-2. ESA Species Impacts – CEQA Proposed Action and Table 4.3-3. ESA Species Effects – NEPA Design Refinements contain the following note: “Current programmatic level designs for [Urrutia Mitigation Site] and SRMS cannot provide quantitative data for species impacts. Detailed impacts to habitat will be disclosed in the Final SEIS/SEIR.”

- This is unacceptable. The draft should provide these details for full disclosure.
- “In the post-project condition, it is anticipated that there would be a large net increase in freshwater emergent/seasonal wetland habitat, riparian woodland, and riverine habitats, while a reduction in grassland/upland and pond habitats would occur (HDR 2023). This would be considered the re-establishment of a former aquatic resource, resulting in a gain in aquatic resource area and functions, which does not require mitigation.”
- It is not clear how the aquatic resource functions would be higher post-project implementation. The reference asserts that aquatic resource values would be higher but does not describe the existing functions and values associated with the existing pond. If implemented, the Proposed Action at Urrutia Mitigation Site would convert deep open water habitat that is scarce and uncommon in the Parkway to riparian forest/scrub habitats that are prevalent and very common.

“[Urrutia Mitigation Site] wetland and riparian habitats would increase, thus expanding available habitat for northwestern pond turtles, the only special-status reptile determined to have the potential to occur onsite. In the existing condition, the site provides marginal habitat value for northwestern pond turtle (HDR 2023).”

- If high rates of mortality of the northwestern pond turtle occur during construction and O&M activities, the special status species will not have the ability to repopulate at the Urrutia Mitigation Site. Turtles must be protected throughout the process of construction, and simply working around observed turtles or nests will not be adequate to ensure they can recover from possibly high mortality rates. Further conservation efforts, such as covering nest sites with nest cages and adding woody debris for basking sites, should be required for mitigation efforts.
- The document should clearly explain why the onsite habitat is considered marginal for the species and acknowledge the importance of grassland habitat for species nesting. The reduction of the grassland habitats and conversion to riparian scrub/forest habitat would reduce the number of nesting sites available. This would have a significant impact and it is unclear, from the description of the Proposed Action, what the mitigation is for the loss of nesting sites that would reduce the impact to less than significant. The CEQA conclusion of Less than Significant with Mitigation Incorporated and the NEPA conclusion of Short-term Significant, unavoidable; Long-term, Minor effects that are Less than Significant with Mitigation Incorporated are not supported.

“A qualified biologist would conduct a pre-construction survey within 7 days before the start of project activities. If no northwestern Pond turtles or nests are observed, USACE would document that information for the file, and no additional measures would be required.”

- One survey is not representative of the entire mitigation site and the population of northwestern pond turtles that may reside there. Nest surveys are also not standardized or proven to be a reliable indicator of turtle populations. “The cryptic nature of pond turtle nests makes them extremely difficult to locate, even for highly skilled biologists. Until more thorough, and consistently comparable research can be conducted, we recommend that all upland areas, irrespective of slope aspect, slope incline, soil type, vegetation type, etc., be protected if it lay within 50 m of occupied or presumed occupied aquatic habitat” (Davidson & Alvarez 2020).
- Nest survey results, in addition to their lack of representation of an area, are not a dependable indicator of the reproduction rates of the northwestern pond turtle. Nest surveys are an acceptable preliminary study to explore the possible presence of turtles in the area and often require further research. “However, observations of nests—even direct observation of nesting females, with no indication of nest-site predation at the surface—cannot be correlated with emergence of neonate turtles. Despite indications in the field of nesting, determination of “successful” nesting of Northwestern Pond Turtles should be confined to observations of post-emergent hatchlings” (Alvarez 2018).
- To truly understand the extent of the northwestern pond turtle population at the Urrutia Mitigation Site and potential impacts, more extensive field studies should be performed before construction ensues.

While the man-made pond does benefit diving birds, reconnecting the floodplain to the river and restoring natural floodplain processes would provide a mosaic of functionally diverse backwater and riparian habitats that would benefit multiple species (Anderson et al. 1996, Serra-Llobet et al. 2022). The permanent floodplain habitat created would provide habitat at different times of the year that an open water feature may not. This floodplain habitat would be important to [provide] cover to

waterfowl in mid- to late summer when local ducks are molting their flight feathers (California Department of Fish and Game 1995).

- This is the first time in the document and the only reference to the type of waterbirds that the Urrutia Mitigation Site supports, but this statement does not acknowledge the scarcity of deep-open water habitat that support wildlife not elsewhere found in the Parkway.
- The above statement is an acknowledgement that the conversion of a deep open water pond habitat to permanent floodplain habitat would provide a different habitat than what is on-site presently.

“Retain a portion of or the full extent of the existing pond would reduce the amount of floodplain mitigation, however, it would have the same effect as the Proposed Action.” (page 4.3-57)

- It is unclear how the document can assert that Alternatives 4a and 4b to retain a portion of the pond at Urrutia Mitigation Site is dismissed under NEPA in light of the above statement.

Conclusion

Over the last several weeks we have heard from well over 150 Parkway stakeholders that are rightfully concerned with the adequacy of the SEIS/SEIR. Our intensive review of the draft SEIS/SEIR has identified serious flaws that must be addressed to meet the legal and procedural requirements of NEPA and CEQA. The process for involving the public and responsible agencies, including us, was inadequate for meaningful involvement in the planning process. The SEIS/SEIR is organized and presented in a way that is nearly impossible for all but the most experienced reviewers to navigate and understand.

The document also is replete with errors and inconsistencies among various sections in describing the project and its impacts. The range of alternatives considered is artificially narrow, inadequate, and/or incomplete, with no meaningful alternative presented or evaluated for bank protection methods or mitigation site locations. The environmental analyses, including impact assessment for noise, air quality, bicycle transportation, recreation, and biological resources, are inconsistent in various sections of the document and misrepresent and omit numerous environmental impacts, including some that were identified in public scoping. In particular, the impacts of bank protection to existing oak woodland and riparian habitat and recreation, as well as the effects of converting/eliminating scarce open water habitat at the Urrutia Pond are either mischaracterized or ignored.

In short, the extensive deficiencies we and others have documented demonstrate that the document is inadequate to meet the legal requirements for public review under NEPA and CEQA and prior to approval significant new information must be considered. We request that the USACE, CVFPB/DWR, and SAFCA reconsider the actions at Contract 3B North and 3B South in relation to the Contract 4B, and in coordination with the TRAC and BPWG per the original EIS/EIR, to ensure that the impacts to the Parkway are minimized and/or avoided. Additionally, we request that the remaining mitigation needs for the project be coordinated with Regional Parks and the NRMP Technical Advisory Committee. Due to multiple deficiencies that have been identified by Regional

Parks and others we expect that significant revisions of the SEIS/SEIR are required and a recirculated document will also be required in accordance with Section 15088.5 of the CEQA Guidelines. This is necessary to not only ensure that responsible agencies and the public can have meaningful input to the process, as is legally required but also to ensure that the approval bodies can make a fully informed decision of the full extent of impacts for a range of alternatives.

It is critical that the proposed project considers a range of reasonable alternatives and provides an adequate analysis to demonstrate that project impacts to the Parkway are minimized and/or avoided to the extent feasible for both the flood control effort and the mitigation effort. Regional Parks, as the administrator of the state and federal Wild and Scenic management plan, is responsible for ensuring that the proposed project actions are consistent with that plan. Our conclusion is that the project within the American River Parkway, as proposed, does not meet this standard.

Cordially,



Liz Bellas,
Director of Regional Parks

cc:

Susan Rosebrough, National Parks Service
Lyla Perkola, National Marine Fisheries
Jennifer Hobbs, US Fish and Wildlife Service

SACRAMENTO METROPOLITAN

**February 21, 2024**

US Army Corps of Engineers
Public Affairs Office
ATTN: ARCF SEIS
1325 J Street Room 1513
Sacramento, CA 95814
Email: arcf_seis@usace.army.mil

RE: ACRF SEIS/SEIR

Dear Public Affairs Office,

Thank you for providing the proposed design refinements to the 2016 American River Watershed Common Features General Reevaluation Report, Final EIS/EIR (2016 ARCF GRR EIS/EIR), involving Magpie Creek Project (MCP); American River Erosion Contracts 3B, 4A, and 4B; Sacramento River Erosion Contract 3; American River Mitigation Site (ARMS); Sacramento River Mitigation Site (SRMS); and installation of a Piezometer Network. This Draft SEIS/SEIR supplements the 2016 ARCF GRR EIS/EIR, which authorized the overall ARCF Project, to address seepage, slope stability, erosion, and height concerns on the levees along the Sacramento and American Rivers for the purposes of flood risk management for the Sacramento Metropolitan area. Our comments are provided below.

Project Overview

The active (and inactive) projects shown in Figure 2.1.1-1 (pg. 54) should be updated to be consistent with the timelines and projects discussed in the report. If future emissions are projected for a project, the project should be listed as active (colored in orange), and if emissions are not forecasted, it should be listed as inactive (in yellow). For example, Tables 3.5-3 and 3.5-4 have emissions forecasted for Sacramento River Erosion Contract 2 and Lower American River Contract 3A but these projects are listed in yellow in Figure 2.1.1-1. It would also be helpful if the projects in orange had the approximate future years when construction would continue.

Recommendation: Please update Figure 2.1.1-1 to be consistent with the projects that have been completed and our ongoing and put the future years underneath the projects that will be completed in the future.

Air Quality - Chapter 5.1.11**Section 3.5.1 Existing Conditions/Affected Environment**

The Proposed Action is broken down into two air basins: Sacramento Valley Air Basin (SVAB) and San Francisco Bay Area Air Basin (SFBAAB). Although the SFBAAB corresponds to the Bay Area Air Quality

Management District boundaries, the SVAB corresponds to multiple air district boundaries and not just one. The SVAB consists of Butte, Colusa, Glenn, Placer, Sacramento, Shasta, Feather River (Yuba and Sutter), Tehama, and Yolo-Solano Air Districts.¹ However, the SEIS Report and analysis (see impact discussion) does not recognize that there are multiple air districts in the SVAB and that each air district does not have the same criteria pollutant designation and classification. Table 3.5-1 and the air quality boundary discussion makes it appear that the attainment status for all the Districts and all the pollutants in the SVAB is identical, which is not the case.

2 Within the SVAB, each air district has jurisdictional authority over their own boundary and is designated and classified based on its air quality status. Out of the eleven Air Districts mentioned in the SVAB, the ozone nonattainment area for Sac Metro Air District which includes Sacramento County, Yolo Solano Air Quality Management District (YSAQMD) which includes Yolo and Solano Counties, Feather River Air District (FRAQMD) which includes Sutter County, and Placer County Air District (PCAPCD) which includes Placer County are all classified as severe for the 2008 NAAQS and serious for the 2015 NAAQS. Each of these four air districts, along with El Dorado County Air Quality Management District (EDCAQMD) form the Sacramento Federal Nonattainment Area (SFNA).^{2,3} Each of the other counties in the SVAB correspond to their own unique air district and are classified for ozone as marginal or attainment.⁴

Recommendation: Clarify in Table 3.5-1 and the corresponding text in the report that the nonattainment boundaries and their corresponding classification are not the same for all the air district's in the SVAB and that a nonattainment/attainment area can be composed of individual or multiple air districts.⁵ Clarify which districts in the SVAB are severe in attainment for ozone and that de minimis thresholds are based on the classification of the nonattainment area (i.e. the de minimis thresholds for a severe-15 area are different than a moderate or serious area). Also, please clarify that the PM₁₀ boundaries only include Sacramento County and not any Districts that border Sacramento County.

3 Also, there is no map showing the boundaries of the air basins and/or the Air Districts.

Recommendation: Include a map showing the boundaries for the Air Districts that are included and will be impacted as part of this study. This map should also clarify that non-attainment/attainment classification boundaries are different for each pollutant (i.e., the nonattainment boundaries for ozone, PM_{2.5} and PM₁₀ are all different).

¹ Air Districts in California - <https://ww2.arb.ca.gov/california-air-districts>

² The Sacramento Federal Nonattainment Area (SFNA) consists of five air districts - SMAQMD, YSAQMD, EDCAQMD, PCAPCD and FRAQMD.

³ These boundaries are unique for ozone - both PM_{2.5} and PM₁₀ (particulate matter of 2.5 microns or less and 10 microns or less) have different boundaries.

⁴ <https://archive.epa.gov/ozonedesignations/web/html/region9f.html>

⁵ Nonattainment and Attainment boundaries: <https://www3.epa.gov/airquality/greenbook/hbcty.html> and <https://archive.epa.gov/ozonedesignations/web/html/region9f.html>

Section 3.5.2 Applicable Laws, Regulations, and Plans

Under discussion of Sacramento Metropolitan Air Quality Management District (pg. 3.5-5), it should be clarified in footnote 1 that although the Sacramento Region was designated as “serious” nonattainment for the 2015 NAAQS, the nonattainment area air districts have submitted a voluntary reclassification request to “severe”. This letter is available under the air district [website](#)⁶ (see footnote under 2015 NAAQS). The adopted 2015 Ozone NAAQS State Implementation Plan was based on the “Severe” classification.

Recommendation: Update Footnote 1 to reflect that a letter was sent by SFNA air districts requesting a reclassification from “serious” to “severe-15.”

Section 3.5.3 Analysis of Environmental Effects

The Analysis Methodology states that “for the Sacramento River Erosion Contract 3 component, modeling conducted by Dutra Group for Contract 2 was relied upon.” There is no footnote or explanation why modeling for Contract 2 was used for Contract 3. The modeling assumptions and information used to determine emissions for Contract 3 would be different than Contract 2. In Appendix C there are also CalEEMod Results for Sacramento River Erosion Contract 3 but no results for Contract 2 (and Contract 2 is listed as inactive in Figure 2.1.1-1 (see previous comment)).

Recommendation: Explain why Contract 2 was used as a proxy for Contract 3. Please provide substantial evidence backing up why data and information for Contract 2 was used for Contract 3. Include CalEEMod Results for Sacramento River Erosion Contract 2 in Appendix C.

Section 3.5.3 - Tables 3.5-3 and 3.5-4

The following comments clarify corrections and inconsistencies in Tables 3.5-3 and 3.5-4.

Tables 3.5.3

- 1) The Sacramento Weir and Bypass will take place in Yolo County (see Section 5.0.0.1, pg. 5-2) and therefore PM₁₀ emissions from the Sacramento Weir should be separated out since it is not part of the Sacramento County PM₁₀ Planning Boundaries (a similar comment was also noted under Table 3.5-4).

Recommendation: Please provide a footnote and also separate out emissions for the Sacramento Weir Project

- 2) The CEQA Threshold for PM_{2.5} is 82 lbs/day not 80 lbs/day.

Recommendation: Please correct threshold for PM_{2.5}

Table 3.5-4

- 1) Incorrectly states that the General Conformity de minimis thresholds are 25 tons per year (tpy) for both PM₁₀ and PM_{2.5}, respectively and 100 tpy for ROG and NO_x, respectively. The thresholds are reversed and should be 25 tpy for ROG (Sacramento Federal Ozone Nonattainment Area for O₃), 25 tpy for NO_x (SFNA-O₃), 100 tpy for PM₁₀ (Sacramento County

⁶

See: <https://www.airquality.org/Businesses/Air-Quality-Plans>

only) and 100 tpy for PM_{2.5} (Sacramento Federal Nonattainment Area for PM_{2.5}). This also affects the subsequent determination for meeting General Conformity requirements.

Recommendation: Correct de minimis threshold levels

- 2) The mitigated ARCF Project NO_x emissions for 2024 are shown as 29.56 tpy which is above the general conformity de minimis threshold. It is the District's understanding that the Corps plans on purchasing Emissions Reduction Credits (ERCs) to offset the mitigation needed for NO_x in 2024.⁷ Please also clarify how NO_x emissions will be offset in 2025 and 2026.

Recommendation: Please indicate that ERCs will probably be purchased from Sac Metro Air District for NO_x.

- 3) After fixing the thresholds errors stated in (1), the mitigated NO_x emissions for 2025 and 2026 exceeded the general conformity de minimis levels and fails to meet the General Conformity Requirements.

Recommendation: Please discuss how this project will meet the general conformity requirements and offset the NO_x emissions to zero.

- 4) The unmitigated ROG emissions for 2026 are lower than mitigated ROG emissions.

Recommendation: Please check the numbers.

- 5) PM₁₀ has different air quality planning boundaries than PM_{2.5} and ozone (see previous comment regarding air district boundaries).⁸ Changes need to reflect that the PM₁₀ boundaries just include Sacramento County. Certain Corps projects (such as the Sacramento Weir) are in Yolo County and therefore should be separated out and these emissions should not be included in determining general conformity. The ARCF Project PM₁₀ Emissions for Sacramento County should be adjusted to reflect this change.

Recommendation: Include a separate emissions table for PM₁₀ emissions from Yolo County and include a footnote. Emissions from the Weir should also be subtracted out from the total for each of the years.⁹

Section 3.5.3, Effect Analysis (No Action Alternative)(pg. 3.5-18)

The second paragraph states that implementing enhanced exhaust control practices will reduce annual construction emissions below the de minimis threshold for NO_x. Table 3.5-4 and previous text support the conclusion that even with those measures that emissions will still exceed the de minimis thresholds and ERCs will need to be purchased for NO_x.

Recommendation: Clarify that the reason emissions are below the de minimis thresholds is because the Corps will be purchasing ERCs.

⁷ The ACOE is also above the general conformity thresholds for NO_x in 2025 (52.36 tpy) and 2026 (45.83 tpy) so ERCs or additional mitigation will be required. NO_x emissions for 2027 (5.85 tpy) was below the threshold.

⁸ The boundaries of these pollutants can be found at <https://www.airquality.org/Businesses/Air-Quality-Plans>.

⁹ In 2025, Mitigated PM₁₀ emissions were 106.66 tpy⁹ which is just above the threshold of 100 tpy. However, when PM₁₀ mitigated emissions from the Sacramento Weir (44.41 tpy) are subtracted the ACOE will be below the threshold of 100 tpy.

Mitigation Measure AIR-4 (pg. 3.5-24)

13 The report states that the USACE anticipates purchasing ERCs for NO_x emissions in 2024 through 2027 because the projects will exceed the de minimis threshold. However, NO_x emissions based on Table 3.5-4 are not expected to exceed the de minimis threshold in 2027, just 2024 through 2026.

Recommendation: Clarify that NO_x emissions will not exceed the de minimis threshold in 2027.

Mitigation Measure AIR-5 (pg. 3.5-24)

14 The CalEEMod Results (see Appendix C) show a M2 engine was used in Phase 1 through 5 which resulted in high NO_x emissions (this comment is also noted in the Appendix C evaluation section of this letter). Renewable diesel should be required to be used for tier 2 (or lower) marine engines to reduce emissions from the project. This could potentially be added as an additional mitigation measure.

Recommendation: Clarify if renewable diesel was assumed as part of the mitigation and if not recommend that there is used for Tier 2 engines.

CEQA Thresholds Exceedances for Particulate Matter

15 Although it appears that Particulate Matter (PM_{2.5} or PM₁₀) emissions will not exceed the de minimis thresholds, both PM_{2.5} and PM₁₀ will exceed the construction thresholds which the District has in place for PM₁₀ of 80 pounds/day and 14.6 tons/year and for PM_{2.5} of 82 pounds/day and 15 tons/year. It is not clear if mitigation measures AIR-1, AIR-2 and AIR-3 will reduce PM emissions (see pages 3.5-21 through 3.5-23) will be sufficient to reduce PM emissions below the thresholds. If not, the Corps will be required to pay mitigation fees for PM emissions that exceed the CEQA thresholds. Currently the mitigation fee rate is \$30,000/ton.¹⁰

Recommendation: Address how mitigation will address exceedances of Particulate Matter thresholds.

Health Risk Screening

16 Health risk screening was not completed for this project although sensitive receptors may potentially be impacted by many of these projects (see page 3-5.1, Sensitive Receptors). An initial screening would show if these sensitive receptors would be impacted and if additional analysis is warranted. Sac Metro Air District's guidance adopted in October 2020 can be used to determine the health effects.¹¹

Recommendation: Conduct an initial health risk screening and additional analysis is warranted.

Greenhouse Gas (GHG) Emissions, Climate Change and Energy Consumption - Chapter 5.1.11**Section 3.6.2.3 (pg. 3.6-6)**

The discussion of Sac Metro Air District should include the GHG emissions thresholds that were established for project construction¹² and Chapter 6 in Sac Metro Air District's Guide to Air Quality

¹⁰ See emissions fees: <https://www.airquality.org/businesses/ceqa-land-use-planning/mitigation>

¹¹ Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District. See: <https://www.airquality.org/LandUseTransportation/Documents/SMAQMDFriantRanchFinalOct2020.pdf>.

¹² See: <https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf>

17 Assessment in Sacramento County (CEQA Guide).¹³ Section 6.2, Analysis Expectations, discusses recommendations that the CEQA analysis use in discussing the potential impacts of project generated GHG emissions.

18 **Discussion of Mitigation Measure GHG-1 (pg.701)**

Please look at other sources for GHG mitigation measures to implement. This includes CARB's Final 2022 Scoping Plan¹⁴ for Achieving Carbon Neutrality (2022 Scoping Plan). This Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic greenhouse gas (GHG) emissions by 85 percent below 1990 levels no later than 2045, as directed by Assembly Bill 1279. Other resources include CAPCOA's greenhouse gas handbook.¹⁵

ARCF Comprehensive Appendices

Appendix C: Air Quality Data

Appendix C presented the CalEE Mod data reports for the Corps projects discussed in the ACOE Supplemental Report. Appendix C provided the following CalEE Mod Runs:

• Magpie Creek	(Analysis Years: 2027)	(pgs. 59 – 180)
• American River Contract 3B, Site 3-1	(Analysis Years: 2024 and 2025)	(pgs. 181 – 252)
• American River Contract 3B, Site 4-2	(Analysis Years: 2025 and 2026)	(pgs. 253 - 306)
• American River Contract 4A	(Analysis Years: 2025)	(pgs. 307 - 378)
• Sacramento River Erosion Contract 3	(Analysis Years: 2025 and 2026)	(pgs. 379 - 439)
• Barge Emissions	(Phases 1 through 5)	(pgs. 440 - 446)
• American River Mitigated Emissions	(Analysis Years: 2024 and 2025)	(pgs. 447 - 528)
• Sacramento River Mitigated Emissions	(Analysis Years: 2024 and 2025)	(pgs. 529 - 597)

Issues

There are discrepancies between the emissions, analysis years, and project names for the projects listed above (included in Appendix C - CalEEMod runs) and Tables 3.5-3 and 3.5-4. Below are some examples of these discrepancies.

- 1) For example, it is not clear how the emissions shown on Table Tables 3.5-3 and 3.5-4 for American River Contract Site 3B Erosion Improvements corresponds to the emissions shown in the CalEEMod Project Results. If this is a combination of emissions from Contract 3, Sites 3-1 and 4-2 it should be clarified, and the combination of emissions should add up to what is shown in Tables 3.5-3 and Recommendation: Make sure the names and emissions in CalEEMod are consistent with emissions show on Table 3.5-3 and 3.5-4.
- 2) There did not appear to be any detailed emissions analysis for the Sacramento Weir. Recommendation: Clarify where the emissions estimates are for Sacramento Weir.
- 3) There was no CalEEMod Run for the emissions shown in Tables 3.5-3 and 3.5-4 for Sacramento River Erosion Contract 2. It should also be clarified the rationale/justification behind using Contract 3 as a proxy for Contract 2 (see previous comment).

¹³ See: <https://www.airquality.org/LandUseTransportation/Documents/Ch6GHG2-26-2021.pdf>

¹⁴ Scoping Plan: <https://ww2.arb.ca.gov/sites/default/files/2022-12/2022-sp.pdf>

¹⁵ CAPCOA Handbook: <https://caleemod.com/handbook/index.html>

Recommendation: Include CalEEMod Run for Contract 2

- 4) CalEE Mod has results for an American River Contract 4A for 2025 but there are no results for this project shown in Tables 3.5-3 and 3.5-4. Conversely, there are emissions for Sacramento River Erosion Contract 4 for 2024 but no CalEEMod Runs are shown for this project.

Recommendation: Make sure CalEEMod Results are consistent with Table 3.5-3 and 3.5-4.

- 5) CalEEMod Runs for American River and Sacramento River Mitigation projects only show CalEEMod results for 2024 and 2025 but Tables 3.5-3 and 3.5-4 show emissions for both projects for 2026 and American River for 2027.

Recommendation: Make sure CalEE Mod Results are consistent with Table 3.5-3 and 3.5-4.

Master Sheet Data

Off Road Equipment (Appendix C pg. 440 of 839 - Phase 1)

The Master Sheet Data shows several pieces of equipment as Tier 2 or lower. The NO_x emissions rates (see 11th column) from this equipment is extremely high¹⁶ and emissions can be reduced by using Tier 3 or 4 equipment instead:

- Line 1 has a Tier 0 crane and line 4 has Tier 2 crane
- Line 21 has a Tier 1 grader

This is also inconsistent with mitigation measure AIR-3 (see pg. 3.5-22 of Report) which states that Tier 0 and uncontrolled engines are prohibited from use in the project. Also, AIR 3 requires a project-wide fleet average of 90 percent Tier 4 emissions vehicles.¹⁷ CARBs off road regulations also bans adding Tier 0, Tier 1 or Tier 2 vehicles to a fleet so it should be confirmed that any equipment that is Tier 2 or lower is part of the existing fleet.¹⁸

Recommendation: Evaluate compliance of off-road construction equipment vehicles which are Tier 2 or lower with regulatory requirements.

Marine equipment pgs. 440 – 445 – Phases 1 through 5

A tugboat is included in Phases 1 through 5 which is listed as M2. The high NO_x emissions from the tugboat might be reduced through the use of renewable diesel or by using a M3 (or M4) tugboat (10% for NO_x and CO; 30% for PM₁₀ and PM_{2.5}).¹⁹

Recommendation: Use renewable diesel or an M3 tugboat.

¹⁶ A single Tier 0 offroad engine has up to 80 times higher emissions per hour compared to a new Tier 4 Final engine (<https://ww2.arb.ca.gov/resources/fact-sheets/fact-sheet-added-vehicle-restrictions-and-tier-phase-out-requirements>)

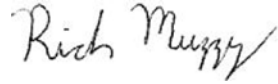
¹⁷ To determine compliance with this requirement for each piece of equipment multiply the engine horsepower by the hours used. Ninety percent (90%) of the total horsepower hours should be from Tier 4 equipment.

¹⁸ See: https://ww2.arb.ca.gov/sites/default/files/offroadzone/pdfs/offroad_booklet.pdf

¹⁹ See: California Environmental Protection Agency. 2015. *Staff Report Multimedia Evaluation of Renewable Diesel*. May. Prepared by the Multimedia Working Group. Sacramento, CA (see pg. 7)

Please contact me at rmuzzy@airquality.org if you have any questions regarding these comments.

Sincerely,

A handwritten signature in dark ink that reads "Rich Muzzy". The signature is written in a cursive, slightly slanted style.

Richard Muzzy
Air Quality Planner

cc: Jaime Lemus, Sac Metro Air District Transportation and Climate Change Director
Raef Porter, Sac Metro Air District Transportation and Climate Change Program Manager
Joseph J. Hurley, Sac Metro Air District Transportation and Climate Change Air Quality
Planner/Analyst
Paul Philley, Sac Metro Air District Transportation and Climate Change Program Supervisor
Mark Loutzenhiser, Sac Metro Air District Monitoring Planning Rules Director
Janice Lam Snyder, Sac Metro Air District Monitoring Planning Rules Program Manager
David Yang, Sac Metro Air District Monitoring Planning Rules Program Supervisor
Steven Lau, Sac Metro Air District Monitoring Planning Rules Associate Air Quality
Planner/Analyst

Public Meeting #1
Via WebEx, January 10, 2024, 5:30pm
Automated transcript of Public Comments Received from WebEx

264 "Naomi E" (1555432192)
00:35:35.752 --> 00:35:55.549

1 Yes, hi thanks. For the chance to be here. My biggest request right now is is an extension so that everybody that would like to share their comments, has the opportunity to do that an extension on the deadline for public comment as stated that we just got this information.

265 "Naomi E" (1555432192)
00:35:55.549 --> 00:36:15.549

And I live close to the current stacked state project, and I was, we had a team that got the signs up because the site there was no signs around here when the, when the trees were cut down. We had a we had a really advocate to get some signage put up and then when the signs were put up, it didn't indicate.

266 "Naomi E" (1555432192)
00:36:15.549 --> 00:36:24.149

2 Any of this current work that's gonna be happening between what? And how that would have given people a lot more opportunity to respond.

267 "Naomi E" (1555432192)
00:36:24.149 --> 00:36:42.479

3 And I'm also like the vibrational impact of what's happening. I lived there and I felt my entire apartment building shaking. They had to put up sensors to make sure that structural damage wasn't isn't didn't happen to the building. But unfortunately they put those sensors up.

268 "Naomi E" (1555432192)
00:36:42.479 --> 00:36:48.299

Uh, pretty much after the most of the ground shaking work was done.

269 "Naomi E" (1555432192)
00:36:48.299 --> 00:36:51.449
Also, I've seen bank erosion.

270 "Naomi E" (1555432192)
00:36:51.449 --> 00:37:01.709

4 Where the trees were removed I never saw that before, uh, before the trees and grass were removed, the banks were stable, but in the, the project work area, it's.

271 "Naomi E" (1555432192)
00:37:01.709 --> 00:37:08.879

Pretty concerning, because we barely, we haven't had that much rain compared to last year. I can't imagine what it would look like right now.

272 "Naomi E" (1555432192)
00:37:08.879 --> 00:37:23.879

5

If if it, you know, I'm just concerned about the this work actually, being as effective as it's the cost of removing all of the amazing trees that are holding the ground that are providing habitat.

273 "Naomi E" (1555432192)
00:37:23.879 --> 00:37:27.419

For birds for the right habitat for the fish.

274 "Naomi E" (1555432192)
00:37:27.419 --> 00:37:40.469

And the salmon, and also, another question is on the other side of the river, there's also a little bit more accessible too. And why isn't that being considered.

275 "Naomi E" (1555432192)
00:37:40.469 --> 00:37:55.697

You know, and these are all questions that everybody has also the project work that was done downstream. There's still no grass growing after 2 years. So that's pretty concerning. For me. That was not the current project that was the previous project and there's.

276 "Keleigh Duey" (2750604800)
00:37:55.697 --> 00:38:00.469

No grass there so a lot of concerns. Thanks, Tammy. That was about 3.

277 "Keleigh Duey" (2750604800)
00:38:00.469 --> 00:38:20.469

Minutes, I think I'm going to have, I can kind of summarize your concerns and I see that you've been putting them in the chat too. Um, you know, I hear that, um, that you are interested in having extension. I hear that you're having concerns about tree removals. Vibrational impacts. Um, I, I am seeing other people put that in the chat as well.

278 "Keleigh Duey" (2750604800)
00:38:20.469 --> 00:38:40.469

Thank you for those comments I really do appreciate it. Um, I am going to go to the next person, and I do want to say, you know, we are transcribing these, but it is very, um, it's difficult to capture all of that. Right. So if you can put those in the chat, or you can email those email address.

279 "Keleigh Duey" (2750604800)
00:38:40.469 --> 00:38:44.610

This is where we do a much better job at responding. Okay.

280 "Keleigh Duey" (2750604800)
00:38:44.610 --> 00:39:04.610

Okay, thank you. So, so I'm gonna go to Bill and Naomi if you can put your hand down, you can hit that little hand button and say, lower your hand. And that way I can go to the next person. So, Bill, Britain, Britain, I'm going to unmute you and at 6:28:So, I'll give you.

281 "Keleigh Duey" (2750604800)
00:39:04.610 --> 00:39:07.795

About 2 minutes. Okay.

282 "Bill Brattain" (3656563712)

00:39:07.795 --> 00:39:23.610

Yeah, hi, um, this is Bill Britain and California registered civil engineer recently retired from the central Valley, regional water, quality control board where I worked for 25 years.

283 "Bill Brattain" (3656563712)

00:39:23.610 --> 00:39:27.360

Doing both surface water and ground water.

284 "Bill Brattain" (3656563712)

00:39:27.360 --> 00:39:36.750

Regulation including stormwater and erosion work and so forth, overseeing that regulatory.

285 "Bill Brattain" (3656563712)

00:39:36.750 --> 00:39:40.230

So, I've already submitted some comments, um.

286 "Bill Brattain" (3656563712)

00:39:40.230 --> 00:39:43.500

Written comments, but, uh.

287 "Bill Brattain" (3656563712)

00:39:43.500 --> 00:39:48.810

I I just now realized that some of my comments.

288 "Bill Brattain" (3656563712)

00:39:48.810 --> 00:39:54.660

Weren't quite the way I had intended because.

289 "Bill Brattain" (3656563712)

00:39:54.660 --> 00:39:58.320

Basically, so oh.

290 "Bill Brattain" (3656563712)

00:39:58.320 --> 00:40:05.580

Along the north side of the large park are about a dozen, heard a joke trees up to 350 years old.

291 "Bill Brattain" (3656563712)

00:40:05.580 --> 00:40:17.700

That were very concerned about and trying to save and I'm concerned that those are being removed unnecessarily to install a logical rock.

292 "Bill Brattain" (3656563712)

00:40:17.700 --> 00:40:28.290

Logical rock at the base of the Levy and that is because the erosion that's occurring down at the river bank, which is about 150 to 200 feet.

293 "Bill Brattain" (3656563712)

00:40:28.290 --> 00:40:48.290

With a bank down at the at the bottom of the river is is very minor. It's been moving moving very slowly and has been monitored by the American river flood control district and Sacramento area, flood control agency for years and most recently in their 2017.

294 "Bill Brattain" (3656563712)

00:40:48.290 --> 00:40:55.500

Monitoring report, they found that the erosion of this site does not threaten the liberty due to the width of the.

295 "Bill Brattain" (3656563712)

00:40:55.500 --> 00:41:03.270

I would agree with that. However, if the trees are removed, I think the erosion is gonna move much more quickly.

296 "Bill Brattain" (3656563712)

00:41:03.270 --> 00:41:15.750

And the logical rock, if it ever gets to where your place and the logical rock, it's going to be too late anyway. So you're basically removing all those trees for no, no reason.

297 "Bill Brattain" (3656563712)

00:41:15.750 --> 00:41:26.790

And it's, you know, it's, it's not going to prevent Levy from being undermined and, and we're gonna lose the, you know, all those beautiful trees.

298 "Bill Brattain" (3656563712)

00:41:26.790 --> 00:41:34.380

So, I was just wondering if the core has even looked at, looked at those monitoring reports.

299 "Bill Brattain" (3656563712)

00:41:34.380 --> 00:41:45.716

And, um, you know, why they're still proposing to do launch rock at the base level, despite the width of the burn and the findings of the monitoring.

300 "Keleigh Duey" (2750604800)

00:41:45.716 --> 00:42:06.140

Hey, I hear you. I hear concerns about these heritage, oak trees, larchmont park. I think that there's a lot of people that are concerned about removal of these trees and the necessity. So, thank you for telling us that in person. Um, I think you have put in the chat as well.

301 "Keleigh Duey" (2750604800)

00:42:06.140 --> 00:42:18.669

Um, if you could talk about the monitoring reports in the chat, um, which ones you're talking about that way, we can talk to our engineers and say, yes, we have looked at those. We've done all of our hydraulic modeling that shows this and we look.

302 "Bill Brattain" (3656563712)

00:42:18.669 --> 00:42:22.606

Get back to you with that formal response, they'll put up at the details of the.

303 "Keleigh Duey" (2750604800)

00:42:22.606 --> 00:42:33.450

Report title yeah any details that anybody can provide you're an engineer former engineer retired engineer. I'm not an engineer. It's not my area of expertise so so we would love yeah. Any.

304 "Bill Brattain" (3656563712)

00:42:33.450 --> 00:42:35.855

As you can put in the chat. Oh, thanks. So much.

305 "Keleigh Duey" (2750604800)

00:42:35.855 --> 00:42:42.810

Okay, okay. Um, yeah, if you could put your hand down, I think that, um, someone said that I skipped someone named.

306 "Keleigh Duey" (2750604800)

00:42:42.810 --> 00:42:53.940

Connolly that, so if your last name is Connolly and you wanted to go ahead, I'm just going in order my chat. It might be a little different but, um.

307 "Keleigh Duey" (2750604800)

00:42:53.940 --> 00:43:00.240

If not, I won't touch back with this, um, person name.

308 "Keleigh Duey" (2750604800)

00:43:00.240 --> 00:43:10.192

Let's go to I have an al merit M. D going to go ahead and unmute you.

309 "L Merritt MD" (613875712)

00:43:10.192 --> 00:43:19.800

Good evening. Everybody. Can you hear me? Okay Yeah we can. Yeah, this is probably some merit.

310 "L Merritt MD" (613875712)

00:43:19.800 --> 00:43:28.800

Thank you for this very comprehensive presentation and all the hard work being done, strengthen our Levy system or reducing erosion protection from overtaking.

311 "L Merritt MD" (613875712)

00:43:28.800 --> 00:43:33.480

And getting through the zoom glitches that we've all lived through the last 3 years.

312 "L Merritt MD" (613875712)

00:43:33.480 --> 00:43:39.270

This is a huge project very important project and to me similar to the precise planning of a complex surgery.

313 "L Merritt MD" (613875712)

00:43:39.270 --> 00:43:44.070

Pre op, planning lab and image testing that we need to do if we're going to do it. Right?

314 "L Merritt MD" (613875712)
00:43:44.070 --> 00:43:58.470

And we appreciate probably having this information session regarding the possible fate of our well established and well, connected community and surrounding ecosystem that I have enjoyed for probably longer than most of you who are talking to us are have been on the earth probably. But.

315 "L Merritt MD" (613875712)
00:43:58.470 --> 00:44:09.840

8

35 years, I would like to know where in the we can find the responses to the issues raised in the prior pyramid report. There were a number of them in addition to the concern about noise.

316 "L Merritt MD" (613875712)
00:44:09.840 --> 00:44:15.540

Increase compromise of their quality with dust, toxic conditions and worse heat. I'm on the facts.

317 "L Merritt MD" (613875712)
00:44:15.540 --> 00:44:21.960

There is also an a protective effect of the river Parkway from the heavily farce habitat.

318 "L Merritt MD" (613875712)
00:44:21.960 --> 00:44:27.390

When you look at the environmental justice screening tools, there appears to be protective effects of the river Parkway.

319 "L Merritt MD" (613875712)
00:44:27.390 --> 00:44:32.460

Along the route, 50 quarter and what happened with the, um.

320 "L Merritt MD" (613875712)
00:44:32.460 --> 00:44:43.530

9

Particularly throughout the 95 to 100 percentile, but reduced to the 8%, our lower closest to the river. So, what's the predicted impact of this project on heat?

321 "L Merritt MD" (613875712)
00:44:43.530 --> 00:44:47.220

10

Air quality fine particulates, increase cancer risk.

322 "L Merritt MD" (613875712)
00:44:47.220 --> 00:44:50.760

And the risk of aggravation of respiratory disorders.

323 "L Merritt MD" (613875712)
00:44:50.760 --> 00:44:58.140

11

I'm also very concerned about the mental health impacts because this is a major recreational area that people come from other areas.

324 "L Merritt MD" (613875712)
00:44:58.140 --> 00:45:01.740
As you well know, we have over 4Million visits a year.

325 "L Merritt MD" (613875712)
00:45:01.740 --> 00:45:11.520
And people come here to escape the heat people who are economically
disadvantage, very much enjoy and recreate an exercise of all ages.

326 "L Merritt MD" (613875712)
00:45:11.520 --> 00:45:27.480
How will the presence of heavy equipment the dust the noise vibrations
not only affect the animals in the wildlife, but as well, the humans,
those of us living there as well as those who usually will enjoy this,
and no longer have access to this beautiful environment.

327 "Keleigh Duey" (2750604800)
00:45:30.934 --> 00:45:49.820
Stay with my time. That was that was beautiful. Thank you. Okay. Um, yes,
and then we received, um, I remember your name coming through for, um,
for your emails. So, we already did receive emails from you and I'm sure
we've received emails from a lot of you already. So, um, so thank you for
that. Um, we have disclosed.

328 "Keleigh Duey" (2750604800)
00:45:49.820 --> 00:46:09.820
Um, all the impacts for a wildlife, like you said, but also for humans,
um, we have environmental justice section, um, just dedicated to that.
Um, so I think you'll find a lot of these, um, if you start reading, um,
the document, um, um, you can start with the executives.

329 "Keleigh Duey" (2750604800)
00:46:09.820 --> 00:46:29.820
Summary that might help you and it's a big table and it shows all of the
resources that we analyzed and it shows you the impacts in the
mitigation. You can kind of start there, um, if you have further
questions on accessing the document, things like that, you're not finding
what you need. You can definitely send us an email and we can try to get
you like a page number. Um.

330 "Keleigh Duey" (2750604800)
00:46:29.820 --> 00:46:33.960
Specifics like that. Okay.

331 "Keleigh Duey" (2750604800)
00:46:33.960 --> 00:46:41.310
All right thanks for your comment. I will be, um, going to let's see
aliza Morris.

332 "Eliza J. Morris" (4111935488)
00:46:45.334 --> 00:46:56.640
Request Hi, thank you. So i2nd a lot of the things everyone else has been
saying, um, I live on that 3 V South portion of the river, and the.

333 "Eliza J. Morris" (4111935488)

00:46:56.640 --> 00:47:00.930

Can I even imagine what it's gonna be like, for all of us but I have a very specific question.

334 "Eliza J. Morris" (4111935488)

00:47:00.930 --> 00:47:07.230

So, I commute along the Levy that goes over from where we live by waterton.

335 "Eliza J. Morris" (4111935488)

00:47:07.230 --> 00:47:12.090

Um, up along the levy on bicycle, and then into tech state, where I work.

13

336 "Eliza J. Morris" (4111935488)

00:47:12.090 --> 00:47:26.190

And so I know I read through your whole thing and a lot of actually those mitigation things you were talking about, say that the impact's terrible acknowledge terribles. It's I think it's significant and unavoidable but the terminology was.

337 "Eliza J. Morris" (4111935488)

00:47:26.190 --> 00:47:39.810

Um, but there was nothing about alternate bike roots for people who use that Levy. Um, it said something about, maybe if there was recreational people, you might look into something, but for those of us who commute with it.

338 "Eliza J. Morris" (4111935488)

00:47:39.810 --> 00:47:46.230

We obviously need something in the same space. So what is the plan for that?

339 "Eliza J. Morris" (4111935488)

00:47:46.230 --> 00:47:53.760

Um, and then, um, it's not just me I, I'm 1 person who bikes, but lots of our neighborhood does and so.

14

340 "Eliza J. Morris" (4111935488)

00:47:53.760 --> 00:48:07.410

If you incorporate the calculation, I actually don't have a 2nd car, so I don't even have another option, but other people will drive instead of biking. Um, and so have you incorporated that into your greenhouse gas?

341 "Eliza J. Morris" (4111935488)

00:48:07.410 --> 00:48:12.728

Calculations.

342 "Keleigh Duey" (2750604800)

00:48:12.728 --> 00:48:20.967

Okay, thank you. Eliza for that comment. Yes. Recreational impacts. We have had to spend a.

343 "Eliza J. Morris" (4111935488)

00:48:20.967 --> 00:48:25.491

A lot of time assessing recreational recreational though, because it's.

344 "Keleigh Duey" (2750604800)

00:48:25.491 --> 00:48:33.540

Need to get to work. Yeah. Well, trans. Sorry. Um, I'm taking notes as we go just so I can keep my own record. Um.

345 "Keleigh Duey" (2750604800)

00:48:33.540 --> 00:48:53.310

Yeah, so commuting, um, and also greenhouse gas impacts associated with having to take, like, take a car. For example, you can't take a 2nd car, but if you have to take a bus now or you have to do things like that. So, you're so you're asking about greenhouse gas impacts related to, um, that okay I got that um, if.

346 "Keleigh Duey" (2750604800)

00:48:53.310 --> 00:49:11.274

Um, let's see, thank you for keeping to that time slot. I am going to go ahead and ask the next person on my list, which is, um, Gerald, I don't know how to pronounce your last name. D. J. U. T. H. I'm gonna unmute you.

347 "Gerald Djuth" (739019776)

00:49:11.274 --> 00:49:16.807

Hi, can you hear me? Okay? Yes, thank you. Yeah.

348 "Keleigh Duey" (2750604800)

00:49:16.807 --> 00:49:17.873

Last name to to.

349 "Gerald Djuth" (739019776)

00:49:17.873 --> 00:49:30.030

Okay, I've been a resident near the this, uh, contract PB area for over 30 years. Um, I blocked that stretch of the American river thousands of times. Um.

350 "Gerald Djuth" (739019776)

00:49:30.030 --> 00:49:37.590

I'm also retired professional geologists. I'm a certified engineering geologists, and a professional civil engineer.

351 "Gerald Djuth" (739019776)

00:49:37.590 --> 00:49:43.980

And I've had some experience with, uh, springbank, erosion and slope stability.

352 "Gerald Djuth" (739019776)

00:49:43.980 --> 00:49:55.590

Projects during my career, I'm opposed to this to this remedy for the south bank of the American river between watch and, uh, and maybe drain.

353 "Gerald Djuth" (739019776)

00:49:55.590 --> 00:50:02.790

I believe that engineering solutions, you know, are most effective when you put the correct solution.

354 "Gerald Djuth" (739019776)
00:50:02.790 --> 00:50:12.090

Applied for the situation and what they're proposing on this stretch the logical toe. Unwatchable trench.

355 "Gerald Djuth" (739019776)
00:50:12.090 --> 00:50:19.440

That may have been necessary for the areas downstream by paradise speech that showed such distressed during previous floods.

356 "Gerald Djuth" (739019776)
00:50:19.440 --> 00:50:26.640

But I don't think that our army corps recognizes that this, that the south bank here.

357 "Gerald Djuth" (739019776)
00:50:26.640 --> 00:50:33.630

Is different the stretch of the river has in most places intense of vegetation.

358 "Gerald Djuth" (739019776)
00:50:33.630 --> 00:50:37.560

Mature riparian vegetation.

359 "Gerald Djuth" (739019776)
00:50:37.560 --> 00:50:45.540

That flow that provides natural armoring, uh, to salt water velocities, stabilize the soils and cushion the.

360 "Gerald Djuth" (739019776)
00:50:45.540 --> 00:50:55.410

Slopes from waterfall and unlike the downstream areas, it's held up really well to the flood events that we've had in the in the past.

361 "Gerald Djuth" (739019776)
00:50:55.410 --> 00:51:07.290

I believe that the strategy is quarterly thought out, uh, it seems like Army Corps is trying to do a 1 size fits all to all the reaches of the river.

362 "Gerald Djuth" (739019776)
00:51:07.290 --> 00:51:16.200

And I think that destroying the right period vegetation here will actually exacerbate the erosion potential.

363 "Gerald Djuth" (739019776)
00:51:16.200 --> 00:51:22.440

That will lead to higher water velocities against the, against the lobby and the banks.

364 "Gerald Djuth" (739019776)
00:51:22.440 --> 00:51:27.660

And cause more erosion, then that's going to lead to a situation where they're going to have to.

365 "Gerald Djuth" (739019776)
00:51:27.660 --> 00:51:32.490
Come in later and put in more once you go down this.

366 "Gerald Djuth" (739019776)
00:51:32.490 --> 00:51:35.940
Down that's that slow that's going to continue.

367 "Gerald Djuth" (739019776)
00:51:35.940 --> 00:51:43.860
So, I implore Army Corps to reconsider their proposal. I'd like to know if they've, if they've, uh.

368 "Gerald Djuth" (739019776)
00:51:43.860 --> 00:51:51.360
Actually considered any other alternatives besides responsible for all and logical trench for this area.

369 "Gerald Djuth" (739019776)
00:51:51.360 --> 00:51:56.040
I think that there's many technical things that they could do to increase the.

370 "Gerald Djuth" (739019776)
00:51:56.040 --> 00:52:05.340
Uh, protection of the lobbies that don't, uh, um, that don't include removing all those trees and destroying the root structure of all that vegetation.

371 "Gerald Djuth" (739019776)
00:52:05.340 --> 00:52:08.670
They could use Armory to protect the toe.

372 "Gerald Djuth" (739019776)
00:52:08.670 --> 00:52:15.951
But needs to be placed in such a way that it enhances and protects the natural vegetation not to.

373 "Keleigh Duey" (2750604800)
00:52:15.951 --> 00:52:19.440
Okay.

374 "Keleigh Duey" (2750604800)
00:52:19.440 --> 00:52:39.440
I'm gonna stop you there. I hear that. You're looking for alternatives has the core considered all of these alternatives. It's not a 1 size fits all type plan for all stretches of of the river. Thank you. I, I really urge you to submit a written comment. So, I can send that to the right people and get the response that you deserve. Okay.

375 "Keleigh Duey" (2750604800)

00:52:43.080 --> 00:52:48.813
I'm going to unmute Greg fishermen.

376 "Gregg Fishman " (1621463552)
00:52:48.813 --> 00:52:55.530
Thank you. Great. I'm a member of the board of directors.

377 "Gregg Fishman " (1621463552)
00:52:55.530 --> 00:52:59.690
I'm also a member of the board of the American river Parkway foundation.

378 "Gerald Djuth" (739019776)
00:52:59.690 --> 00:53:02.189
These comments for my own, I'm not speaking.

379 "Gregg Fishman " (1621463552)
00:53:02.189 --> 00:53:03.250
That.

380 "Gerald Djuth" (739019776)
00:53:03.250 --> 00:53:04.526
Want to make this.

381 "Gregg Fishman " (1621463552)
00:53:04.526 --> 00:53:09.750
No, I think it's a great box. In theory. You're holding a couple of.

382 "Gregg Fishman " (1621463552)
00:53:09.750 --> 00:53:29.750
Great public forums, but I can tell you, I don't think you're importing a whole lot of information that's valuable to most of it. I'm glad that you got the professional engineers on on this call that are offering some alternatives. I agree with the last gentleman who spoke that this seems to be a project that is a 1 size fits all and I know from.

383 "Gregg Fishman " (1621463552)
00:53:29.750 --> 00:53:49.750
From a prior work experience, the Army Corps was planning to do a flood control project in downtown Napa that involved a lot of rip. Rep and the entire Napa community came together and said, no, we want something better. And what they have now is actually a model for what can be done in.

384 "Gregg Fishman " (1621463552)
00:53:49.750 --> 00:54:05.640
Head of rip wrap it is a usable channel that that is available for recreation most of the year, and still serves as a flood control channel for those high water events. This is a completely different project. And I'm speaking.

385 "Gregg Fishman " (1621463552)
00:54:05.640 --> 00:54:25.640
Specifically about the American river project here. It's a completely different project. I get that but what I'm asking you to do is to think

outside the box. I agree completely with the last gentleman. The repairing habitat that you're going to be destroying is irreplaceable. And I guess the last thing I would say, I would say is.

386 "Gregg Fishman " (1621463552)
00:54:25.640 --> 00:54:31.350
Your mitigation in downstream.

17

387 "Gregg Fishman " (1621463552)
00:54:31.350 --> 00:54:37.470
Discovery part I'm sure that's going to be great for the salmon and the birds and that's important to absolutely.

388 "Gregg Fishman " (1621463552)
00:54:37.470 --> 00:54:50.670
But it does not do anything for the environment here in our neighborhoods that is also being destroyed. And I will put this in an official in written comments and submit it.

389 "Gregg Fishman " (1621463552)
00:54:50.670 --> 00:54:58.314
But I would just urge you to rethink this and try to think outside the box instead of just doing a 1 size fits all project.

390 "Keleigh Duey" (2750604800)
00:54:58.314 --> 00:55:00.030
Okay.

391 "Keleigh Duey" (2750604800)
00:55:00.030 --> 00:55:19.200
Okay, thank you for that comment. Um, I do yeah, I realize that there are there's a lot of things that we're trying to balance, you know, um, we're not trying to just cut all the trees down. We're not just trying to rock the entire Levy, but we do have to balance public safety with, you know, the wildlife and with everything that's out there. Um.

392 "Keleigh Duey" (2750604800)
00:55:19.200 --> 00:55:25.200
Thank you for submitting a written comment shortly. Um, and I do think that, um.

393 "Keleigh Duey" (2750604800)
00:55:25.200 --> 00:55:45.200
Yeah, hearing some of these comments today and maybe wanting to speak with some engineering folks. It sounds like maybe we can put together another meeting specifically. It sounds like maybe for American river erosion contract. So so that's on our awareness now. Yeah. Let me, um.

394 "Keleigh Duey" (2750604800)
00:55:45.200 --> 00:55:50.034
For me at the next person, I have David bee.

395 "David B" (458136832)
00:55:56.014 --> 00:56:05.460

Okay, thank you. Yeah. Hi, my name's David. Um, my family's lived in the call, uh, screens, East neighborhood for, for close to 30 years.

396 "David B" (458136832)
00:56:05.460 --> 00:56:09.420
We regularly used the larchmont park.

397 "David B" (458136832)
00:56:09.420 --> 00:56:13.890
My family walks the Levy, the trails, um.

18

398 "David B" (458136832)
00:56:13.890 --> 00:56:20.010
Up and down the river daily for exercise we Kayak on the river in the summer months.

399 "David B" (458136832)
00:56:20.010 --> 00:56:25.380
The park in the river are a large part of why we enjoy living here.

400 "David B" (458136832)
00:56:25.380 --> 00:56:29.550
And I just don't see a reason to intervene.

401 "David B" (458136832)
00:56:29.550 --> 00:56:36.630
And disrupt the river and all that surroundings to stop or limit erosion.

402 "David B" (458136832)
00:56:36.630 --> 00:56:41.880
From from what we've seen, there's been little to none in the 30 years that we've been here.

403 "David B" (458136832)
00:56:41.880 --> 00:56:46.920
Even, if there was that the plan grown up.

404 "David B" (458136832)
00:56:46.920 --> 00:56:51.510
Appears to destroy much of the natural ecosystem. The of the river.

405 "David B" (458136832)
00:56:51.510 --> 00:56:55.500
As well, as the natural beauty that that all my neighbors enjoy.

406 "David B" (458136832)
00:56:55.500 --> 00:56:58.920
About living here as well as the habitat for her.

407 "David B" (458136832)
00:56:58.920 --> 00:57:02.040
The many wildlife that we see in that area.

408 "David B" (458136832)

00:57:02.040 --> 00:57:05.400

You know, I could see a project that went in.

409 "David B" (458136832)

00:57:05.400 --> 00:57:15.270

Made improvements moved rocks that were native to the environment into strategic areas, and then left the river in a state that looked much like, man, that never touched it.

410 "David B" (458136832)

00:57:15.270 --> 00:57:18.270

Um, but I don't think that's what this is.

411 "David B" (458136832)

00:57:18.270 --> 00:57:21.600

This project, um, appears to be something different.

412 "David B" (458136832)

00:57:21.600 --> 00:57:29.850

Attempting to alter the rivers and natural process that survived for probably billions of years by intervening. Now.

413 "David B" (458136832)

00:57:29.850 --> 00:57:37.860

I know we probably won't be able to stop the project for moving forward because I know there's probably lots of money and lots of jobs on the line.

414 "David B" (458136832)

00:57:37.860 --> 00:57:44.820

But I'm going to continue to ask that you do it with a light hand, and try to make it look like it was never touched.

415 "David B" (458136832)

00:57:44.820 --> 00:57:50.449

Um, cause it can't be done. That's all I have. Okay, thank you for.

416 "David B" (458136832)

00:57:50.449 --> 00:57:53.875

For your comment, David? Yeah. Thanks for the time. Okay.

417 "Keleigh Duey" (2750604800)

00:57:53.875 --> 00:58:02.340

I see that we have a lot of hands raised, so I'm going to try to just keep going. Okay. I want to get through everyone tonight. Um.

418 "Keleigh Duey" (2750604800)

00:58:02.340 --> 00:58:08.053

Daniel, hi, Rola can on mute you.

419 "Daniel Airola" (169106688)

00:58:08.053 --> 00:58:12.240

Hi, there, thank you.

420 "Daniel Airola" (169106688)

00:58:12.240 --> 00:58:32.240

I have about 10 pages of comments already, so I'm not going to get into great detail. I am a professional wildlife biologist. I have 40 years experience in environmental consulting, and I just want to make a couple of points 1st of all. Really? An extension is needed here. I don't want to.

20

421 "Daniel Airola" (169106688)

00:58:32.240 --> 00:58:52.240

Cast dispersions toward any of the staff or the consultants, but the decision to release this document, when you did creates the appearance that you really don't want public input. And if you actually do want public input, I think you need to demonstrate that by giving a project of this.

422 "Daniel Airola" (169106688)

00:58:52.240 --> 00:59:12.240

City more time for people to understand absorb and to comment. Secondly, I will just say that they're still on my part despite considerable effort a lot of lack of clarity about what the project is actually going to consist of and.

21

423 "Daniel Airola" (169106688)

00:59:12.240 --> 00:59:32.240

I'm talking about area 3, a, and B, you know, what's a construction buffer? A construction buffer would seem to be an area adjacent to a construction site, but there are no construction sites identified on the documents or it's and it's not possible to make comments on a.

22

424 "Daniel Airola" (169106688)

00:59:32.240 --> 00:59:43.620

Project that is not presented in an understandable fashion. So the comments about having an additional meeting where we can actually understand what's going on.

23

425 "Daniel Airola" (169106688)

00:59:43.620 --> 00:59:46.650

In order to comment, I think is critical.

426 "Daniel Airola" (169106688)

00:59:46.650 --> 01:00:04.350

And then, lastly, I'll just say very quickly for general knowledge. The biological resources analysis is really quite disappointing. The mitigation measures that are applied are very minimal and don't address some fundamental comments.

24

427 "Daniel Airola" (169106688)

01:00:04.350 --> 01:00:18.480

That I will be making, especially regarding the impacts of the Irish upon destruction on wintering waterbirds that use that area importantly, as a root site and some other, uh.

428 "Daniel Airola" (169106688)

01:00:18.480 --> 01:00:24.110
Some other issues that I won't go into at this point. So thank you.

429 "Keleigh Duey" (2750604800)
01:00:24.110 --> 01:00:31.950
Okay, thank you for all that. I appreciate it. I know you commented during our our scoping too so.

430 "Keleigh Duey" (2750604800)
01:00:31.950 --> 01:00:42.615
Yes, I'm glad you're back. All right I am going to go to, um, a person named Pell P. E. L. L. E.

431 "Pelle" (1148963584)
01:00:42.615 --> 01:00:49.470
Hello Hi, I'm with the city of Sacramento.

432 "Pelle" (1148963584)
01:00:49.470 --> 01:01:09.470
Okay, it's a long document. I think I'm getting it page. 3 dash. 7 talks about all alternatives being analyzed at an equal level of detail. I'm interested in hall routes. It looks like only were provided for alternative to the proposed project. And so there's.

433 "Pelle" (1148963584)
01:01:09.470 --> 01:01:12.600
Hall rep for all 1:3:or 4.

434 "Pelle" (1148963584)
01:01:12.600 --> 01:01:21.150
So, I just wanted to verify that my other comment was on page. 3:12:it talks about.

435 "Pelle" (1148963584)
01:01:21.150 --> 01:01:24.390
Um, only.

436 "Pelle" (1148963584)
01:01:24.390 --> 01:01:31.680
Only, what has changed from the 2016 document.

437 "Pelle" (1148963584)
01:01:31.680 --> 01:01:34.770
Is, um, discussed.

438 "Pelle" (1148963584)
01:01:38.190 --> 01:01:58.190
Okay, it says for this, the proposed action only includes project components that are modifications or design refinements of the 2016 document. So, with regard the hall routes are all the whole routes included in this supplemental or if I want to see.

439 "Pelle" (1148963584)
01:01:58.190 --> 01:02:03.256

Complete list of hall routes do I need to look at the 2016 document? And this document.

440 "Keleigh Duey" (2750604800)
01:02:03.256 --> 01:02:08.853
Thank you. Okay. Thank you.

441 "Keleigh Duey" (2750604800)
01:02:08.853 --> 01:02:32.691
Yeah, I'm not sure we'll have to check back on that whether we have figures for all the hall routes. Yeah. Obviously, this is just a supplemental document. It's a huge supplemental document, but there's a lot of information in the 2016 and there are links on the website to that. If needed. I'm sure we'll see your comment in writing here soon so that we can.

442 "Pelle" (1148963584)
01:02:32.691 --> 01:02:35.760
Yeah, yeah, yeah, just the, uh.

443 "Pelle" (1148963584)
01:02:35.760 --> 01:02:40.890
It's almost I didn't look at the 2016 document, but we have, uh.

444 "Pelle" (1148963584)
01:02:40.890 --> 01:02:47.310
Situations when neighbors get involved and we're not aware of things. So.

445 "Pelle" (1148963584)
01:02:47.310 --> 01:03:04.800
I think my comment would just, you know, we want we're interested in public noticing and it's kind of difficult. Just I understand the layout of the document. You can't include everything from before, but really we need to consider the 2016 and the supplemental in terms of.

446 "Pelle" (1148963584)
01:03:04.800 --> 01:03:08.730
Working with neighbors and what they can expect as far as.

447 "Pelle" (1148963584)
01:03:08.730 --> 01:03:13.978
Traffic impacts cause I get the sense. There may be additional material in the.

448 "Keleigh Duey" (2750604800)
01:03:13.978 --> 01:03:32.336
16, but, I don't know, okay. For things like that, where you're not sure. Um, you're not ready to submit a formal comment if you want to comment we've been responding when people need assistance in submitting their from a comment. So, if you need help, or you can't find the right thing. Um, go ahead and email us. And we'll get you that.

449 "Pelle" (1148963584)
01:03:32.336 --> 01:03:34.297

Okay, okay.

450 "Keleigh Duey" (2750604800)

01:03:34.297 --> 01:03:41.090

Okay, either of the 2 emails. Yeah. Or you can put it here in the chat today. Okay. Thanks.

451 "Pelle" (1148963584)

01:03:41.090 --> 01:03:42.089

Okay.

452 "Keleigh Duey" (2750604800)

01:03:42.089 --> 01:03:54.480

And then if if people can push that raise hand button, when, when you're all set, and then I can go to the next person, I have someone named Pete going to unmute. You.

453 "Keleigh Duey" (2750604800)

01:04:14.220 --> 01:04:21.876

Pete, um, let's see. Are you there, Pete?

454 "pete" (3839514368)

01:04:21.876 --> 01:04:35.580

Um, yep. Okay. Okay. Okay I'll repeat I'll get right to my point. The erosion control contract will not add 1 additional outs flood protection to Sacramento.

28 455 "pete" (3839514368)

01:04:35.580 --> 01:04:40.980

Instead it will kill between 50,700 trees, including many heritage jokes.

456 "pete" (3839514368)

01:04:40.980 --> 01:04:49.050

It will destroy acres of vegetation vegetation and holds the bank together and slows water flow. Both of which provide protection for erosion.

457 "pete" (3839514368)

01:04:49.050 --> 01:04:54.012

The contract will remove public access to many of the most popular fishing sites wildlife the.

29 458 "" (0)

01:04:54.000 --> 01:05:14.000

Areas and watercraft access points and I'll repeat it will not add 1 additional rounds of flood protection. The American river is designated as a wild and scenic river under both the state and federal laws. You're destroying many of the outstanding recreational features that earn that designation. In fact, it will totally destroy the clay banks and pirates.

459 "" (0)

01:05:14.000 --> 01:05:25.920

Is that were part of the original Sarah park the inspiration for the entire American river Parkway you're stealing these features of our crown jewel. Not only from us, but from future generations as well.

460 "" (0)

01:05:25.920 --> 01:05:33.780

In a days ahead, you're going to be receiving many detailed comments dockets shortcomings in the I. R.

461 "" (0)

01:05:33.780 --> 01:05:41.070

You'll see that river flow velocities next to the bank and a stretch of a river are extremely low in many places less than a mile an hour.

462 "" (0)

01:05:41.070 --> 01:06:00.480

I hope and pray that you'll take the time to read the comments and stop this contract. So, go back to your calculators, go back to your models, come up with a targeted data driven, erosion, control plan that we can live with when that strengthens specific areas without obliterating trees, spawning areas, roofs and beaches.

463 "" (0)

01:06:00.480 --> 01:06:04.080

This is more than saving up to 700 trees from slaughter.

464 "" (0)

01:06:04.080 --> 01:06:24.080

This is about preserving the crown jewel of Sacramento for generations to come and providing protection without devastation. The core South, central valley flood protection board, have done. Great work to protect Sacramento. You strengthen Lovey slurry with Flurry walls. You increase the false from Deb spillway capacity. These were.

465 "" (0)

01:06:24.080 --> 01:06:45.500

Projects but erosion control projects, it's not 1 of them. It's a bad idea a very bad idea, and it will not add any additional flood protection. My name is Pete Spaulding, the volunteer mile steward for my 11 south of the American river Parkway. I live on Rio. Bravo circle, and, like, a lot of my neighbors that have commented.

466 "" (0)

01:06:45.500 --> 01:06:48.613

I've been here for 30 years as well. Thank you for listening.

467 "Keleigh Duey" (2750604800)

01:06:48.613 --> 01:07:03.274

Thank you Pete. Um, yeah, let's move on to, um, Jay. Um, go belly. I'm going to unmute you.

468 "JGabele" (3401700864)

01:07:03.274 --> 01:07:17.610

31 It's actually gable, thank you very much. That's my last name. I am actually very concerned and I also agree that I do believe you need to extend the time period.

469 "JGabele" (3401700864)
01:07:17.610 --> 01:07:37.610

32 By which you're allowing the public and also pure agencies to review, what's been compiled, you have a massive amount of documents and the site has been difficult. You need to look at both the original, plus the supplemental and subsequent versions.

470 "JGabele" (3401700864)
01:07:37.610 --> 01:07:57.610

And in looking at this, and just as the gentleman before me, Pete was talking about contract. I would definitely have very deep concerns. We've been looking at what was some of the data that supposedly is linked to the site selections and you can see, for example.

33 471 "JGabele" (3401700864)
01:07:57.610 --> 01:08:17.610

In certain points, where maybe only 2 samples were taken out of 25 that were recommended, and even those don't appear to line up. And then I also have looked at some of the velocity discussions that you've offered in both the original, and then subsequent information and see material.

472 "JGabele" (3401700864)
01:08:17.610 --> 01:08:37.610

Bills where you can see sourcing of old data, brought into the rebranding of a new study that is concerning the data may or may not be valid. But it's a, it's part of the integrity that the public I think is trying to communicate to you, is that, you know, the site selection.

473 "JGabele" (3401700864)
01:08:37.610 --> 01:08:57.610

34 Seems to be a 1 size fits all. And if we look at some of the original scope, it was talking about 22 miles of what really? From nimbus down down on. The lower American river is the entire American river Parkway. That Parkway is the lifeblood of Sacramento. And the greater Sacramento region.

474 "JGabele" (3401700864)
01:08:57.610 --> 01:09:01.170

Which we live around, it's an economic engine for us.

475 "JGabele" (3401700864)
01:09:01.170 --> 01:09:21.170

35 In this community, it's been measured all the way back to 2008. I believe the number is 364Million a year that comes around it just as an example you've studied and looked at the salmon fisheries. I think some of that data still even needs to be updated to a more current biological opinion because the studies that we've looked at have.

476 "JGabele" (3401700864)
01:09:21.170 --> 01:09:41.170

The reds in 90 or 95% of them are what Avenue and above. So you are dealing with an extremely sensitive area, especially in the area and to do mitigation to 1 point down at Discovery park when yeah. Just using that species. The examiner still had species as an example.

477 "JGabele" (3401700864)

01:09:41.170 --> 01:10:01.170

The entire Parkway can't shift there and you're going too fast. You're going to cut down, you know, foreign font and trees the ecosystems that the wildlife and the species rely on. That also are important to heat and pollution. It's a water quality.

478 "JGabele" (3401700864)

01:10:01.170 --> 01:10:21.170

We're all part of that ecosystem so I just feel like, you know, it isn't 1 size fits all we really do as a group with you, and others that are participating in the study. Really need to make sure that we're right, right? And we need to be much, much more surgical in our mitigation and there needs to be preservation. 1st, and.

479 "JGabele" (3401700864)

01:10:21.170 --> 01:10:42.133

Then onsite mitigation priorities, and we also need to look at the pace and take in the impacts not just my obviously of each section, but the work that's already been done. We're for example, in the paradise speech area, all that have period habitats gone. That's impacting the river now.

480 "Keleigh Duey" (2750604800)

01:10:42.133 --> 01:10:47.751

And then we'll get you 2 and a half to kind of do a couple of your time you made a lot of.

481 "JGabele" (3401700864)

01:10:47.751 --> 01:10:50.314

Kind of good points and I really hope to see a.

482 "Keleigh Duey" (2750604800)

01:10:50.314 --> 01:10:52.430

Comment from you so that we can.

483 "JGabele" (3401700864)

01:10:52.430 --> 01:11:02.289

Respond to all of that. Okay. Yes. And please do an in person meeting because we are having huge difficulties with the graphics and even when we enlarge them, they get.

484 "JGabele" (3401700864)

01:11:02.289 --> 01:11:07.430

Pixelated because the original source graphics, and a lot of your documents are like that.

485 "Keleigh Duey" (2750604800)

01:11:07.430 --> 01:11:14.429

Okay, thank you. Okay, thank you so much. Um, Joshua Thomas I'm gonna unmute you.

486 "Keleigh Duey" (2750604800)
01:11:14.429 --> 01:11:29.789
Joshua Thomas.

487 "Keleigh Duey" (2750604800)
01:11:29.789 --> 01:11:34.859
Hi, I can hear you now.

488 "Keleigh Duey" (2750604800)
01:11:34.859 --> 01:11:48.495
Hello yeah, we can hear you.

489 "Joshua Thomas" (1063974400)
01:11:48.495 --> 01:11:56.639
Again, okay, so considering how massively destructive these rock trenches and toes are.

490 "Joshua Thomas" (1063974400)
01:11:56.639 --> 01:12:16.639
The court does not appear to attempt to justify them, especially for contract, and especially around the clay banks and project 3 B, South and in front of larchmont community park. Really? The only documents that the are reference for justification the geotechnical report and the.

491 "Joshua Thomas" (1063974400)
01:12:16.639 --> 01:12:19.709
And protection analysis from the 2016.

39

492 "Joshua Thomas" (1063974400)
01:12:19.709 --> 01:12:24.149
General reevaluation report and the geotechnical report found that.

493 "Joshua Thomas" (1063974400)
01:12:24.149 --> 01:12:32.519
In this area, no seepage and stability deficiencies exist and it recommended no further improvements in the area.

494 "Joshua Thomas" (1063974400)
01:12:32.519 --> 01:12:50.339
Containing project 3 weeks it says this on page 16, then the erosion protection analysis, and recommended they take the core do more boring, take more boring samples to do more studies because of a high degree of variability in bed materials. But the core.

495 "Joshua Thomas" (1063974400)
01:12:50.339 --> 01:13:10.339
Does not appear to have collected more samples or done more studies. And in fact, the closest boring it took was at how we, which is nowhere near the area between the main drain and Y, Avenue where they're cutting down 522 trees. So, why didn't the core follow through the recommendations of its panel of experts to take more boring samples?

496 "Joshua Thomas" (1063974400)
01:13:10.339 --> 01:13:22.211

40

And how can it justify a massive project that will pull those 500 trees?
And for 2 years pump diesel exhaust and particulate matter into the air
near an elementary school.

497 "Keleigh Duey" (2750604800)
01:13:22.211 --> 01:13:25.559
Thank you, thank you for your comment, Joshua.

498 "Keleigh Duey" (2750604800)
01:13:25.559 --> 01:13:29.519
I will move to Peter.
499 "Keleigh Duey" (2750604800)
01:13:36.652 --> 01:13:39.789
Yeah, hi, can you hear me? Yes.

500 "Peter J Connelly" (976204800)
01:13:39.789 --> 01:13:51.629
Good good evening. So I just want to emphasize everyone on this call that
definitely submit a written comment letter. Everybody has some really
relevant comments.

501 "Peter J Connelly" (976204800)
01:13:51.629 --> 01:13:59.729
So, please try to get your comments on record. So, looking at the project
description from a kind of a.

502 "Peter J Connelly" (976204800)
01:13:59.729 --> 01:14:05.069
Higher elevation it seems like the analysis just realized some very.

41

503 "Peter J Connelly" (976204800)
01:14:05.069 --> 01:14:25.069
Over generalized claims that this erosion protection is needed and is
based on very minimal. Like I said, over generalized data. I think
there's, there's minimal justification for the project specifically. Um,
there is no, there is not 1 instance of Levy.

504 "Peter J Connelly" (976204800)
01:14:25.069 --> 01:14:45.069
Specifically on the South Side of the American river upstream of what
Avenue um, I've lived this area probably over 40 years, and there's been
some extensive brain events that the Levy has held up and performed as as
designed. And I.

505 "Peter J Connelly" (976204800)
01:14:45.069 --> 01:14:48.779
Just take this is it over? Um.

506 "Peter J Connelly" (976204800)
01:14:48.779 --> 01:15:06.749

Misuse of, uh, federal and state funds that could be appropriate in some other some other area environmental work. Um, maybe some more targeted erosion controls. Um, somewhere downstream it, um.

507 "Peter J Connelly" (976204800)

01:15:06.749 --> 01:15:21.119

Exact date the work that was done at sac state. That's I think that's justified. Um, and then also, my neighbor is not even in a flood zone, so I don't understand why.

508 "Peter J Connelly" (976204800)

01:15:21.119 --> 01:15:28.799

There's a statement that basically you even made the statement that we have to consider.

509 "Peter J Connelly" (976204800)

01:15:28.799 --> 01:15:48.799

Safety over the environment, um, and there's really very minimal risk in my opinion that this area is going to be inundated by by significant flooding from specifically from failure at the Levy. Um, I think.

42

510 "Peter J Connelly" (976204800)

01:15:48.799 --> 01:16:11.269

In 1992, they pumped a bunch of slurry along along the Levy, um, that goes down. I don't know how deep it goes, maybe 100 feet. So, I don't think this Levy is going anywhere, so I'm going to just going to put all my comments in a comment letter and make sure it gets, um, on the record. I really appreciate.

511 "Peter J Connelly" (976204800)

01:16:11.269 --> 01:16:16.214

Your time and your taking the time to have this.

512 "Keleigh Duey" (2750604800)

01:16:16.214 --> 01:16:21.299

This meeting okay, thank you so much Peter. We look forward to seeing those comments.

513 "Keleigh Duey" (2750604800)

01:16:21.299 --> 01:16:28.434

Um, I am going to go to William Avery.

514 "Joshua Thomas" (1063974400)

01:16:28.434 --> 01:16:33.299

Okay.

515 "William Avery" (1315185664)

01:16:33.299 --> 01:16:36.336

All right. Thanks for the opportunity.

516 "Keleigh Duey" (2750604800)

01:16:36.336 --> 01:16:39.794

This week, can you hear me? Yeah, we can hear you.

517 "William Avery" (1315185664)

01:16:39.794 --> 01:16:50.129

So this is Dr William Avery, uh, also, professional biologist and, uh, professor Meredith X date.

518 "William Avery" (1315185664)

01:16:50.129 --> 01:16:59.699

Contract 3 B, proposals, clearing river banks and vegetation and trees, including heritage Oaks, and other valuable 3 species of heritage.

519 "William Avery" (1315185664)

01:16:59.699 --> 01:17:19.699

Size black, walnut, cottonwoods, organ, hash and white older on the South Side of the river. From what? To large month. Excuse me? This is an area with well established self, renewing, vegetative armory, provided by the existing root network and relatively impervious to erosion of flow. Velocity is less than 80 per. 2nd.

520 "William Avery" (1315185664)

01:17:19.699 --> 01:17:23.249

2000 CFS for a 200 a year flood event.

521 "William Avery" (1315185664)

01:17:23.249 --> 01:17:26.849

We're advanced models that take into account.

522 "William Avery" (1315185664)

01:17:26.849 --> 01:17:34.049

Vegetation and trees suggest that the actual bank side flows at 160,000 CFS. Maybe even less than that.

523 "William Avery" (1315185664)

01:17:34.049 --> 01:17:38.849

These models need to be considered by the Army Corps in their analysis.

524 "William Avery" (1315185664)

01:17:38.849 --> 01:17:44.369

Table 4 dash 4 in the in the general.

525 "William Avery" (1315185664)

01:17:44.369 --> 01:17:58.559

Erosion appendix suggests that vegetation such as class. A turf grass can withstand blows up to 8 feet per. 2nd rude at all. 2014 found that mature, right? Period trees or even superior to grasp.

526 "William Avery" (1315185664)

01:17:58.559 --> 01:18:09.599

And that we are, uh, that we recommend that right here and for us, it should be conserved to provide banks and disability and to maintain an equilibrium of.

527 "William Avery" (1315185664)

01:18:09.599 --> 01:18:15.929

Uh, river and flood plain dynamics, further proposals to big trenches, filters, rocks.

528 "William Avery" (1315185664)

01:18:15.929 --> 01:18:20.939

Way in a, on the cleared banks and cover this treatment with soil.

529 "William Avery" (1315185664)

01:18:20.939 --> 01:18:40.939

To create planting benches for the 2 years of the construction in 3 to 5 years post construction. It takes for significant vegetation growth in any form of vegetation armoring to occur. These folks be vulnerable to erosion and velocities as low as 2 to 4 feet per. 2nd, also from the table for dash.

530 "William Avery" (1315185664)

01:18:40.939 --> 01:18:46.894

Soil erosion its risk actually goes up during this 4 to 7 your time period.

531 "Keleigh Duey" (2750604800)

01:18:46.894 --> 01:18:52.373

About ready to get cut off. I'm pretty close. Okay. Let me go. You can summarize for me.

532 "William Avery" (1315185664)

01:18:52.373 --> 01:18:59.849

I can go to the last my little summary statement and tell you that. I posted this in the in the comments That'll also go in.

533 "William Avery" (1315185664)

01:18:59.849 --> 01:19:11.639

Uh, with a regular, you know, comment portal for these reasons, we asked that the south bank erosion protection projects, upstream of the avenue bridge, especially in the fair formation. Clay banks.

534 "William Avery" (1315185664)

01:19:11.639 --> 01:19:21.899

Protective zones of Sarah part river miles 9 to 11 be removed from contract. 3. B, if critical spots are identified, where erosion repairs required.

535 "William Avery" (1315185664)

01:19:21.899 --> 01:19:31.499

We asked that a surgical approach be applied working in from the rivers edge, using habitat preserving via technical engineering. Thanks for listening.

536 "William Avery" (1315185664)

01:19:31.499 --> 01:19:34.994

Thank you William. Sure.

537 "Keleigh Duey" (2750604800)

01:19:34.994 --> 01:19:41.519

Um, Nancy, this screen can unmute, you.

538 "Keleigh Duey" (2750604800)

01:19:49.019 --> 01:20:05.036
Okay.

539 "J. Paul Bruton" (3550220544)
01:20:05.036 --> 01:20:10.079
Sure, if you're talking, we can't hear you, you're done, you.

540 "Nancy Kniskern" (3836922624)
01:20:13.195 --> 01:20:19.589
Is this worth working? Yeah, we can hear you now. Okay. Thank you.

541 "Nancy Kniskern" (3836922624)
01:20:19.589 --> 01:20:22.799
Um, I live close to meet you.

542 "Nancy Kniskern" (3836922624)
01:20:22.799 --> 01:20:41.249
Now, behind my house, my bedroom window is about 20 feet from the Levy and I'm afraid that they're gonna use that to the construction of moving and moving great equipment along this area, which is going to raise just particulate matter.

543 "Nancy Kniskern" (3836922624)
01:20:41.249 --> 01:20:52.889
And also big vibration on the house, and I wonder if there's any mitigation or help on anything that might be hurt during that time or unusually uncomfortable.

544 "Nancy Kniskern" (3836922624)
01:20:52.889 --> 01:21:07.439
I am concerned that you're taking, you're taking out a lot of the old folks and other trees that are decades old and cannot be easily replaced. The force has developed complexity with different ranges of.

545 "Nancy Kniskern" (3836922624)
01:21:07.439 --> 01:21:11.729
Trees providing habitat for many species of birds and other wildlife.

546 "Nancy Kniskern" (3836922624)
01:21:11.729 --> 01:21:17.729
1 thing we have to embrace is that these older trees, these old heritage oaks.

547 "Nancy Kniskern" (3836922624)
01:21:17.729 --> 01:21:28.799
Parties required resting nesting, habitat shelter for species, including wood ducks, common barn, ash started.

548 "Nancy Kniskern" (3836922624)
01:21:28.799 --> 01:21:36.299
Fly catches in about 4 other species. It takes time for this habit to develop and removing it in the wild life.

549 "Nancy Kniskern" (3836922624)

01:21:36.299 --> 01:21:40.439

It will be gone as well. If you remove the trees, you remove the wildlife.

550 "Nancy Kniskern" (3836922624)

01:21:40.439 --> 01:22:00.439

It's a heartbreak to me at this older age to see that the river's going to be shut down to my access for 2 years and then not be able to be repairing itself for another 6 years. And I doubt if I'll ever have the use of that river again, it makes me very sad. I'm also a little worried about the cavalier attitude of.

551 "Nancy Kniskern" (3836922624)

01:22:00.439 --> 01:22:03.599

The core because you are.

552 "Nancy Kniskern" (3836922624)

01:22:03.599 --> 01:22:23.599

Very nice, very agreeable, but you should be having a recorder for your meeting and maybe an engineer present. I wish you would answer the questions when you promised to answer them as in the chat questions that were posed on 12:12:with the meaning of the core and the lower American river task force. I have.

553 "Nancy Kniskern" (3836922624)

01:22:23.599 --> 01:22:29.669

Public Affairs about that, and he's gotten back to me, I don't always get an answer and public affairs or return.

554 "Nancy Kniskern" (3836922624)

01:22:29.669 --> 01:22:51.139

Very carefully, and I've always been told if you go up against the core, don't bother, because they will go ahead with their projects. No matter what you have to say, and that's a really a bit of a heartbreak. And I do think you have people that list, and I have worked with the core before and it's been a very, very good process. And what you do in the Missouri River.

555 "Nancy Kniskern" (3836922624)

01:22:51.139 --> 01:22:57.179

I've been reading about because they also had bank stabilization projects.

556 "Nancy Kniskern" (3836922624)

01:22:57.179 --> 01:23:00.334

And a lot of good work.

557 "Keleigh Duey" (2750604800)

01:23:00.334 --> 01:23:05.660

Okay, thanks for your comment, Nancy. I'm sorry that haven't been responsive.

558 "Nancy Kniskern" (3836922624)

01:23:05.660 --> 01:23:07.913

Thank you very much. Thank you.

559 "Keleigh Duey" (2750604800)
01:23:07.913 --> 01:23:11.009
Okay, thanks Nancy.

560 "Keleigh Duey" (2750604800)
01:23:11.009 --> 01:23:16.709
I'm going to ask Michelle Stevens.

561 "Keleigh Duey" (2750604800)
01:23:54.215 --> 01:23:58.776
Didn't help no problem in this.

562 "Michelle Stevens" (76109056)
01:23:58.776 --> 01:24:06.989
But I have worked at what she liked for over 5 years collecting data on.

563 "Michelle Stevens" (76109056)
01:24:06.989 --> 01:24:15.959
Western quantity conservation we have years of data on on a using the area.

564 "Michelle Stevens" (76109056)
01:24:15.959 --> 01:24:21.389
And I'm not snowy colleges, so I've been planting.

565 "Michelle Stevens" (76109056)
01:24:21.389 --> 01:24:28.229
Culturally important plants Ameritas professor anyway.

566 "Michelle Stevens" (76109056)
01:24:28.229 --> 01:24:36.569
1 thing that is really important is the West, Northwestern pine turtles, which is the turtles we have here.

567 "Michelle Stevens" (76109056)
01:24:36.569 --> 01:24:46.199
And then proposed as listed as listed as threatened by the US Fish and Wildlife service. I will provide you a great deal of information.

568 "Michelle Stevens" (76109056)
01:24:46.199 --> 01:24:58.319
From our data from our letters supporting listing, I think all of us who observe wildlife along the river will attest to the fact that we have a rather small population of Northwestern.

569 "Michelle Stevens" (76109056)
01:24:58.319 --> 01:25:04.619
Especially relative non native turtles. So what I would suggest is a.

570 "Michelle Stevens" (76109056)
01:25:04.619 --> 01:25:08.219
When you are doing construction on the, uh.

571 "Michelle Stevens" (76109056)

01:25:08.219 --> 01:25:28.219

Lobby area near sad state. Those turtles were brew meeting. That means they're asleep. So I don't know if they could get away from the construction at all. So, there there should be windows of construction when they're avoiding avoiding when they're nesting, they'll be going back and forth between the.

572 "Michelle Stevens" (76109056)

01:25:28.219 --> 01:25:31.559

Trust you on aquatic habitat? Um.

573 "Michelle Stevens" (76109056)

01:25:31.559 --> 01:25:41.519

I would recommend you do basking habitat along the river and at the at the restoration site, the other thing.

574 "Michelle Stevens" (76109056)

01:25:41.519 --> 01:25:46.319

Please consider the lower American river as an integrated intact.

575 "Michelle Stevens" (76109056)

01:25:46.319 --> 01:25:50.639

Highly truncated and fragmented habitat corridor.

50

576 "Michelle Stevens" (76109056)

01:25:50.639 --> 01:25:57.029

So, it's 1 ecosystem and the animals have already dear coyotes. Bobcats.

577 "Michelle Stevens" (76109056)

01:25:57.029 --> 01:26:06.959

There are ready really in a very small area so if you could stage the construction to maintain a corridor for wildlife, that'd be great.

578 "Michelle Stevens" (76109056)

01:26:06.959 --> 01:26:14.789

51

Also, green and white sturgeon are both listed they should be included as fish in your.

579 "Michelle Stevens" (76109056)

01:26:14.789 --> 01:26:22.979

Wildlife section also, I would like I'm working with tribes, planting gathering and tending what she like.

52

580 "Michelle Stevens" (76109056)

01:26:22.979 --> 01:26:42.979

I strongly advise you to use character, Barbara, it's God's gift to bank stabilization and restoration and other important plans. McGuire, Indian ham milkweed. I'll provide all that, but I strongly urge you to use culturally significant plants in your plant mix. And the last thing.

581 "Michelle Stevens" (76109056)

01:26:42.979 --> 01:26:49.289

I only have 2 minutes is, you know, I really, really recommend you do a walk and talk.

582 "Michelle Stevens" (76109056)

01:26:49.289 --> 01:26:56.729

53

By the river, we have a lot of knowledge if we could see the sights with you, it would do a great.

583 "Michelle Stevens" (76109056)

01:26:56.729 --> 01:27:04.332

Benefit were public relations and we could all benefit from each other's observations and knowledge. Thank you.

584 "Keleigh Duey" (2750604800)

01:27:04.332 --> 01:27:11.369

Okay, thank you. Michelle.

585 "Keleigh Duey" (2750604800)

01:27:11.369 --> 01:27:15.419

I see, let's see next, um, is Jessica Wiseman?

586 "Jessica Wiseman" (4011026688)

01:27:19.054 --> 01:27:31.199

Hi, thank you. I'm not going to repeat many of my concerns that are shared by my neighbors and larger community. I wanted to offer another request.

587 "Jessica Wiseman" (4011026688)

01:27:31.199 --> 01:27:51.199

I'm going to read exactly what I wrote in the comments not knowing. What's going to be considered based upon whether it's posted or whether it's vocally stated larchmont park, man love water station, the air between what? And waterton as well as the areas off American river drive. Are all deemed staging areas these areas back into houses.

54

588 "Jessica Wiseman" (4011026688)

01:27:51.199 --> 01:27:58.709

I'd like to know what analysis has been done for ground pollution, structural, pull the image impact on children.

589 "Jessica Wiseman" (4011026688)

01:27:58.709 --> 01:28:10.829

And residents with compromised health issues in addition to Aaron noise pollution, can you please address these issues specifically for those of us with literally these staging areas feet from our backyard.

590 "Jessica Wiseman" (4011026688)

01:28:10.829 --> 01:28:15.989

Thank you and I just want to reiterate that this is a supplementary comments.

591 "Jessica Wiseman" (4011026688)

01:28:15.989 --> 01:28:35.989

55

There's been several people that have stated very important issues regarding the environmental impacts the necessity of a blanket of approach versus targeted erosion control that I'm full supportive further investigation as well. Thank you so much for offering us the opportunity for this public forum. And again, I.

56

592 "Jessica Wiseman" (4011026688)
01:28:35.989 --> 01:28:45.713

You to offer yet, another public forum, particularly in person for further analysis, and complete transparency for our community. Thank you.

593 "Keleigh Duey" (2750604800)
01:28:45.713 --> 01:28:55.259
Thank you, Jessica I'm gonna go to, um.

594 "Keleigh Duey" (2750604800)
01:28:55.259 --> 01:29:02.854
Johnson I'm probably not pronouncing that. Right am I K. E. L.
595 "Mikkel Herholdt Jensen" (493554688)

01:29:02.854 --> 01:29:12.419
Yes, hi, thank you. I'm, I'm a professor at sack state and I live just south of the river.

596 "Mikkel Herholdt Jensen" (493554688)
01:29:12.419 --> 01:29:20.039
What have you I don't want to reiterate too much of what people have said. I agree with with what everybody has said about the impacts.

57

597 "Mikkel Herholdt Jensen" (493554688)
01:29:20.039 --> 01:29:26.729
It paints me to think of what will happen to the vegetation and the wildlife and the.

598 "Mikkel Herholdt Jensen" (493554688)
01:29:26.729 --> 01:29:32.189
Natural treasure that is the river, which is really, I think, is the resident a privilege to get to enjoy.

599 "Mikkel Herholdt Jensen" (493554688)
01:29:32.189 --> 01:29:36.479
As well, as the impact on day to day life, I feel the.

58

600 "Mikkel Herholdt Jensen" (493554688)
01:29:36.479 --> 01:29:42.809
The impact of pollution, and all the other aspects that have been raised locally need to be considered.

601 "Mikkel Herholdt Jensen" (493554688)
01:29:42.809 --> 01:29:47.429
The thing that strikes me and that I wanted to comment on is we've heard from many.

602 "Mikkel Herholdt Jensen" (493554688)
01:29:47.429 --> 01:29:51.689

Mentioned that vegetation is really a form of erosion control.

603 "Mikkel Herholdt Jensen" (493554688)

01:29:51.689 --> 01:29:57.749

And so it shocks me to see the Army Corps of engineers considered a liability in the flow of the river.

604 "Mikkel Herholdt Jensen" (493554688)

01:29:57.749 --> 01:30:03.299

That combined with the previous reports, which seem to indicate that.

605 "Mikkel Herholdt Jensen" (493554688)

01:30:03.299 --> 01:30:06.539

There is not further action needed.

606 "Mikkel Herholdt Jensen" (493554688)

01:30:06.539 --> 01:30:20.909

Um, really makes me question the justification for the project and you look at the work that's done across from sac state. Not only is it currently unusable as a recreational space and, and completely devoid of natural life? It's bare and vulnerable.

607 "Mikkel Herholdt Jensen" (493554688)

01:30:20.909 --> 01:30:30.119

And it's not a, if you think about erosion, that's not what what an erosion resistant bank looks like.

608 "Mikkel Herholdt Jensen" (493554688)

01:30:30.119 --> 01:30:36.809

And so I, I wonder if you mentioned the river also needs to accommodate additional flow.

609 "Mikkel Herholdt Jensen" (493554688)

01:30:36.809 --> 01:30:40.079

If that's where the issue comes in.

610 "Mikkel Herholdt Jensen" (493554688)

01:30:40.079 --> 01:30:45.839

Is the goal actually to control erosion or is it to increase the water transport capacity of the river?

611 "Mikkel Herholdt Jensen" (493554688)

01:30:45.839 --> 01:30:52.079

Because those are 2, very different goals. You know, some of the plans I'm hearing is, we have to.

612 "Mikkel Herholdt Jensen" (493554688)

01:30:52.079 --> 01:30:56.279

Remove the vegetation in order to up the flow capacity of the river.

613 "Mikkel Herholdt Jensen" (493554688)

01:30:56.279 --> 01:31:03.029

But now you're not describing a river now you're describing a canal, which is a very different thing. And so I would like to hear more discussion on.

614 "Mikkel Herholdt Jensen" (493554688)
01:31:03.029 --> 01:31:08.429
What's the, what's the goal here? Is it to actually control erosion or is it to.

615 "Mikkel Herholdt Jensen" (493554688)
01:31:08.429 --> 01:31:15.296
Is it to accommodate the water flow? Because you're, you're doing it at the expense of, of having a river.

616 "Keleigh Duey" (2750604800)
01:31:15.296 --> 01:31:23.639
Okay, thank you for your comment. I see another hand up Ellen Ganz.

617 "Keleigh Duey" (2750604800)
01:31:23.639 --> 01:31:36.479
Going to unmute. Let's see. Try it again.

618 "Keleigh Duey" (2750604800)
01:31:48.209 --> 01:31:51.659
I can't hear you if you're speaking.

619 "Keleigh Duey" (2750604800)
01:31:51.659 --> 01:32:02.704
We lost your hand. Let me see if I can unmute you. Hi now, I can see you. Hold on. Let me try it again. Okay, so I sent you an unmute. I think there's.

620 "Ellen Ganz" (2390902272)
01:32:02.704 --> 01:32:24.259
The button you have to click. Okay, thank you. So, I wonder if there could be someone who can who can answer questions here at the next meeting because so many good questions have been asked tonight. I really appreciate so many. Very knowledgeable. People saying good information tonight. And people who have been here.

621 "Ellen Ganz" (2390902272)
01:32:24.259 --> 01:32:32.429
Long that this is a gem of an area, and I moved here 5 years ago because of that.

622 "Ellen Ganz" (2390902272)
01:32:32.429 --> 01:32:52.429
And I have specific questions about what the smog is and what the noise will be. What other people have said about the park I live 3 doors down from larchmont park. Exactly. Where the staging area will be. I have a son who just turned 8 years old and now I'm wondering if this will be a.

623 "Ellen Ganz" (2390902272)
01:32:52.429 --> 01:33:00.389
Area to live in when I purchased the film specifically to have this access to this open.

624 "Ellen Ganz" (2390902272)
01:33:00.389 --> 01:33:06.839
A space that it's very devastating and my question really is what can be done.

625 "Ellen Ganz" (2390902272)
01:33:06.839 --> 01:33:10.619
To have this reconsidered and to listen to some of these.

626 "Ellen Ganz" (2390902272)
01:33:10.619 --> 01:33:18.299
Long time residents and engineers who are here tonight, just being in Sacramento for the time.

627 "Ellen Ganz" (2390902272)
01:33:18.299 --> 01:33:26.159
I have, and I have been a resident in Sacramento for 15 years. We know the areas that are going to flood and it's not area.

63

628 "Ellen Ganz" (2390902272)
01:33:26.159 --> 01:33:32.789
Even though the lobbyist there, it's just, um, that's not the areas that that.

629 "Ellen Ganz" (2390902272)
01:33:32.789 --> 01:33:36.299
And it's hard to believe as.

630 "Ellen Ganz" (2390902272)
01:33:36.299 --> 01:33:43.859
Others have stated that removing part of the lobby, the vegetation 1 anyway and strengthen and it's just.

631 "Ellen Ganz" (2390902272)
01:33:43.859 --> 01:33:46.919
Not common sense. Um.

64

632 "Ellen Ganz" (2390902272)
01:33:46.919 --> 01:33:52.829
So, I would also join in the comments for, for more meetings in person meetings.

633 "Ellen Ganz" (2390902272)
01:33:52.829 --> 01:33:56.789
And, um, and hoping that.

634 "Ellen Ganz" (2390902272)
01:33:56.789 --> 01:34:03.569
At least after this, all happened that that they do take into account the children and families who live here and.

635 "Ellen Ganz" (2390902272)
01:34:03.569 --> 01:34:12.509

65

That the recreation is important, the open space is important and to make sure that that's built into the plans as well as protecting the nature as best we can.

636 "Ellen Ganz" (2390902272)
01:34:12.509 --> 01:34:15.744
Thank you. Okay. Thank you. Ellen.
637 "Keleigh Duey" (2750604800)
01:34:15.744 --> 01:34:23.121
Um, E.

638 "E Sunahara" (733512192)
01:34:23.121 --> 01:34:27.059
Hi, my name is Emily.

639 "E Sunahara" (733512192)
01:34:27.059 --> 01:34:31.859
And I have already put comments in the chat.

640 "E Sunahara" (733512192)
01:34:31.859 --> 01:34:35.429
But I would just wanted to mention that I think.

66

641 "E Sunahara" (733512192)
01:34:35.429 --> 01:34:40.679
You're hearing a lot of upset tonight and I think the way the.

642 "E Sunahara" (733512192)
01:34:40.679 --> 01:34:45.659
Army Corps of Engineers has approached this project, um, especially.

643 "E Sunahara" (733512192)
01:34:45.659 --> 01:34:49.499
For the American reverse section 3 be.

644 "E Sunahara" (733512192)
01:34:49.499 --> 01:34:52.949
It feels very dismissive.

645 "E Sunahara" (733512192)
01:34:52.949 --> 01:34:57.179
Releasing a large technical report over the holiday.

646 "E Sunahara" (733512192)
01:34:57.179 --> 01:35:01.889
Public comment, period over the holiday and now we're having.

647 "E Sunahara" (733512192)
01:35:01.889 --> 01:35:09.239
A web meeting, not even the courtesy of an in person meeting and we're having.

648 "E Sunahara" (733512192)
01:35:09.239 --> 01:35:13.022

Numerous technical issues on this meeting.

649 "Mikkel Herholdt Jensen" (493554688)

01:35:13.022 --> 01:35:16.860

An section of river section that.

650 "E Sunahara" (733512192)

01:35:16.860 --> 01:35:24.059

Technical issues, I think a lot it could go a long way to simply.

651 "E Sunahara" (733512192)

01:35:24.059 --> 01:35:33.839

Help the corps of engineers understand that our community wants to be heard and we are reasonable people many of us work in government.

652 "E Sunahara" (733512192)

01:35:33.839 --> 01:35:37.529

Many of us are executives and educators.

653 "E Sunahara" (733512192)

01:35:37.529 --> 01:35:42.959

We know about this area, we know of how government works.

654 "E Sunahara" (733512192)

01:35:42.959 --> 01:35:54.959

Please just include us and bring us along, you know, really genuinely try to get our buy in here. Because right now what it feels like is that.

655 "E Sunahara" (733512192)

01:35:54.959 --> 01:36:09.989

We're just being appeased with web meetings and we're being appeased with, oh, public comment, period over Christmas and New Year's and that doesn't feel good. Right? And so that will naturally cause upset.

656 "E Sunahara" (733512192)

01:36:09.989 --> 01:36:16.229

If we could have some genuine discussions here, I love the idea of the walk along the walk and talk.

657 "E Sunahara" (733512192)

01:36:16.229 --> 01:36:20.625

That might go a long way for you guys with this project. Thank you.

658 "Keleigh Duey" (2750604800)

01:36:20.625 --> 01:36:25.619

Thank you Emily.

659 "Keleigh Duey" (2750604800)

01:36:25.619 --> 01:36:29.249

Looks like Justin Augustine.

660 "justin augustine" (1673333504)

01:36:34.235 --> 01:36:40.019

Thanks this is Justin Augustine. So I went to center for a while.

661 "Keleigh Duey" (2750604800)
01:36:47.158 --> 01:36:53.680
Sorry, Justin, I think I muted you.

662 "justin augustine" (1673333504)
01:36:53.680 --> 01:36:55.760
I.

663 "Keleigh Duey" (2750604800)
01:36:55.760 --> 01:36:58.718
All right no problem. Can you hear me now? I can hear you sorry about that.

664 "justin augustine" (1673333504)
01:36:58.718 --> 01:37:01.351
And should I just start a.

665 "Keleigh Duey" (2750604800)
01:37:01.351 --> 01:37:03.740
I don't know what you guys had already heard. I'm sure. Yeah please.

666 "justin augustine" (1673333504)
01:37:03.740 --> 01:37:10.139
Over yeah. Okay. So again, I'm Justin Augustine. I worked with the center for biological diversity, but I also live near.

667 "justin augustine" (1673333504)
01:37:10.139 --> 01:37:16.139
Watch my park and so for obvious reasons, I'm especially concerned about the 3 be part of the project.

668 "justin augustine" (1673333504)
01:37:16.139 --> 01:37:20.789
And, you know, I have 2 kids, 4 year old daughter, a 7 year old son, and both of them.

669 "justin augustine" (1673333504)
01:37:20.789 --> 01:37:25.739
Um, they just they love a number of different spots along the South stretch the American river.

670 "justin augustine" (1673333504)
01:37:25.739 --> 01:37:36.839
We swim there, there's ropes swings. They play on, climb the trees all the time and, um, I think just most importantly, when we go down there along the edge of the water, it really feels like a magical place.

671 "justin augustine" (1673333504)
01:37:36.839 --> 01:37:48.929
Especially the repairing forest along the edge of the river. That's just it's beautiful. And it's surprising that you're surrounded by an urban landscape because when you're down there, it feels like you're going back in time to, you know.

672 "justin augustine" (1673333504)
01:37:48.929 --> 01:37:55.979
Christine place, and I think we, as a community, such exceptionally lucky that it exists the way it still exists.

673 "justin augustine" (1673333504)
01:37:55.979 --> 01:38:05.999
And to me, it won't be able to serve that purpose. If the plans they exist, go forward, you know, I've seen what happened down your SEC state and what happens under 3 B is even half as bad as that.

674 "justin augustine" (1673333504)
01:38:05.999 --> 01:38:16.319
It'll just be a complete disaster for the American river as we know it. And so I don't know how anyone can sign off on that as being compatible with the wild and scenic river act. It just, it really isn't. So, like.

675 "justin augustine" (1673333504)
01:38:16.319 --> 01:38:24.419
I hope you really listen to everyone that's already gone before me there does need to be an alternative solution here that avoids ruining the 3 B stretch of the American river. Thanks.

676 "Keleigh Duey" (2750604800)
01:38:27.785 --> 01:38:31.426
Carrie.

677 "Carey Knecht" (260631552)
01:38:31.426 --> 01:38:37.259
Hello, can you hear me.

678 "Carey Knecht" (260631552)
01:38:37.259 --> 01:38:57.259
Yes, okay. Thank you. Building on some of the other comments. I just want to share this perspective. You know, we live along the Levy, and I too often walk along the river with my children and I don't know that we've talked enough here tonight about what this river area really means to the entire city of Sacramento. You know, on summer weekend.

679 "Carey Knecht" (260631552)
01:38:57.259 --> 01:39:17.259
And it's full, it's a really full of people, you know, there's families, there's children, there's all sorts of folks that are people out there, swimming fishing getting on and off of Ross rafting by it's it's a very festive area. They're also unhoused people who are finding shade there and this.

680 "Carey Knecht" (260631552)
01:39:17.259 --> 01:39:37.259
All, during a time where we've been experiencing record high temperatures, not just mid summer when the public pools are open, but in the months before, and after the county has been identifying public

fooling centers and we, ourselves had our air conditioning go well, for about a month. Personally, use the river as a way to.

681 "Carey Knecht" (260631552)

01:39:37.259 --> 01:39:57.259

Cool. And so I would like to know more about the analysis around the public health impacts of this beautiful riverfront area, becoming more like a unshaded. I don't know if gravel parking lot is a fair characterization, but that's what some of the pictures remind me of. We also see bike teams, running groups.

682 "Carey Knecht" (260631552)

01:39:57.259 --> 01:40:14.099

So many people are using the area. I think it's, it's a regionally significant project that deserves a 45 day comment, period, and much wider public outreach. I'm surprised not to have seen posters up at some of the entrance points to the Parkway.

683 "Carey Knecht" (260631552)

01:40:14.099 --> 01:40:24.509

I appreciate the postcard which we receive, but I think there really should be a broad an effort to really get brought in from everyone in Sacramento, because it's such a heart.

684 "Carey Knecht" (260631552)

01:40:24.509 --> 01:40:43.082

Of the city, and then, in addition to extending the comment period and really meaningfully engaging with alternatives that wouldn't destroy the beauty of the area, you know, also doing a lot more to get to get a public input from from the whole city. So, thank you for your time here tonight and.

685 "Keleigh Duey" (2750604800)

01:40:43.082 --> 01:40:50.369

For letting me come on, thank you Carrie. See, Sarah.

686 "sara denzler" (4022391552)

01:40:54.443 --> 01:40:59.489

Okay, yeah. Hi. Thanks. Um.

687 "sara denzler" (4022391552)

01:40:59.489 --> 01:41:20.129

Is it Kelly? Kelly? Yeah, it's Kelly. Okay, Kelly, thank you for staying so long to let us make our comments on this project. Um, I know these processes are really hard on the staff that have to go through all of it too. So, I just want to acknowledge that, um, I, uh.

688 "sara denzler" (4022391552)

01:41:20.129 --> 01:41:40.129

I live just upstream in the May huge rain, but I have lived here for over 35 years and I walked this section between here and watch almost every day and spent a lot of time out on the Parkway. And I also know that 1 of my neighbors is a retired professor from South state and he's got about 20 years.

689 "sara denzler" (4022391552)

01:41:40.129 --> 01:42:00.129

Or more of data on nesting birds that includes the area upstream, immediate drain, but also some of downstream of Mega drains. So, if you're not aware of that resource for knowing what's going on with the bird population, I recommend contacting him. And I can provide that in my comments. Um, I work for the Department of water resources.

690 "sara denzler" (4022391552)

01:42:00.129 --> 01:42:15.119

For most of my career both running the urban streams restoration program, which was funding stream projects and then also working on the central valley conservation strategy for the, for department of water resources and the core. And, um.

691 "sara denzler" (4022391552)

01:42:15.119 --> 01:42:35.119

I just want to add my voice. I'm I'm not going to repeat a lot of what other people have said, but I want to add my voice with concerned about, um, particularly the section and whether or not, uh, the extreme measures that are being proposed are justified considering, uh, the past steady results.

692 "sara denzler" (4022391552)

01:42:35.119 --> 01:42:52.049

And and the incredible impact, it will have on the Parkway. And, um, and the length of time it will take for recovery for species. And I also wanted to raise the cumulative impact concerns with the downstream work that's already gone on a lot of a lot of.

693 "sara denzler" (4022391552)

01:42:52.049 --> 01:43:12.049

Burden while life species were displaced because of that work and I imagine I don't have facts, but I imagine that some of those species moved up into our section above how and above what and, um, you know, we're just eliminating more and more of the right. Period habitat along the river and California already has lost over 90.

694 "sara denzler" (4022391552)

01:43:12.049 --> 01:43:23.850

95% of its repairing habitats. So every additional incremental loss that we have is just, uh, you know, making it that much harder for species to survive. And for.

695 "sara denzler" (4022391552)

01:43:23.850 --> 01:43:35.520

Uh, you know, just continuation of wildlife and bird species and, um, and also just the, the potential impacts to the city in terms of.

696 "sara denzler" (4022391552)

01:43:35.520 --> 01:43:43.650

Water quality, and in terms of recreation and all the other things, people have mentioned, I won't go on and on. But anyway, thank you very much.

697 "sara denzler" (4022391552)

01:43:43.650 --> 01:43:54.690

For taking comments, and I would really like to see an extended comment, period, and some more in person meetings to discuss the different aspects of the project. I think it was.

698 "sara denzler" (4022391552)

01:43:54.690 --> 01:43:58.740

Too many different projects lumped into 1:1:um.

699 "sara denzler" (4022391552)

01:43:58.740 --> 01:44:06.150

Overall process on the, and it'd be good to split those up so we can understand and have specific comments.

700 "sara denzler" (4022391552)

01:44:06.150 --> 01:44:09.458

For the different areas, so thank you very much. Okay. Thank you. Sarah.

701 "Keleigh Duey" (2750604800)

01:44:09.458 --> 01:44:14.057

Sandra Sanders.

702 "Sandra Sanders" (2420174848)

01:44:14.057 --> 01:44:36.020

Kelly, you are a trooper I just want to say that I work for the Senate natural resources and water agency. So I have my share of sitting in long hearings and hearing lots of public comment. And and so I just want to thank you for again.

703 "Sandra Sanders" (2420174848)

01:44:36.020 --> 01:44:56.020

I was saying allowing us to have this extra time to do that, and I am not going to be speaking though, on it as a state government employee. I'm going to be speaking as a person that has lived here for 60 years now in this area and yes, I probably don't look my age, but I have.

704 "Sandra Sanders" (2420174848)

01:44:56.020 --> 01:45:16.020

In this area that a long time, and I aligned my comments with Bill Avery, and with Pete Spalding and Nancy is I'm not gonna repeat. I fully agree with what they're saying about the more targeted approach, less invasive. Um, I was planning on my retirement, you know, being this, uh.

705 "Sandra Sanders" (2420174848)

01:45:16.020 --> 01:45:36.020

In this area, I use it every day. The stretch South. Um, that's, um, that's mentioned is for the construction work. And, um, so I, I'm really just urging for a targeted approach and only what is necessary and urge.

706 "Sandra Sanders" (2420174848)

01:45:36.020 --> 01:45:49.290

Use case, and and all the entities involved to take a look at this and if there's a possible extension, we can work on it and look at it more and do more study and agree that.

707 "Sandra Sanders" (2420174848)

01:45:49.290 --> 01:46:09.290

This we cannot ever replace, we can ever undo what will be done and moving the elderberry trees over to real americano, high school. And the mitigation efforts that are mentioned still are not going to replace our 20,300 year old heritage oak trees that I have seen all. My life and.

708 "Sandra Sanders" (2420174848)

01:46:09.290 --> 01:46:24.720

It's not going to do much for me to wait 20 more years when I'm 80 years old for some of the growth to come back and the habitat to be gone. So, yes, there's an emotional aspect for those that actually live here. And, um.

709 "Sandra Sanders" (2420174848)

01:46:24.720 --> 01:46:33.577

I'm just urged that it would be not so invasive and to do only what is necessary and save as much of our habitat as possible.

710 "Keleigh Duey" (2750604800)

01:46:33.577 --> 01:46:40.140

Oh, thank you. Thanks, Sandra. Mark. Barry.

711 "Mark Berry" (3343273728)

01:46:53.656 --> 01:47:05.280

Not working yet. I hear you now. Okay. Thank you. It's a little more cumbersome than others. Other features anyway. Yeah, thank you for.

712 "Mark Berry" (3343273728)

01:47:05.280 --> 01:47:15.000

Taking the opportunity to have people make public comment and 1 thing I've started reviewing the documents, but, like, many, um.

713 "Mark Berry" (3343273728)

01:47:15.000 --> 01:47:35.000

It's very imposing when they arrive, just, uh, right before the holidays, and I'm not sure I've looked at everything in there. In fact, I know I haven't looked at everything in there, but 1 thing I didn't notice and I, I did do a search for was is there was there consultation with us fishing?

714 "Mark Berry" (3343273728)

01:47:35.000 --> 01:47:41.760

Wildlife services, National Marine, fisheries, California, department, efficient wildlife you know, I didn't see.

715 "Mark Berry" (3343273728)

01:47:41.760 --> 01:47:52.770

You know, sort of extensive discussions or really reported discussions and the findings in particular for contract 3 B, and some of the others.

716 "Mark Berry" (3343273728)
01:47:52.770 --> 01:47:56.910
I've been very much involved with, uh, um.

717 "Mark Berry" (3343273728)
01:47:56.910 --> 01:48:14.400
Efforts to preserve the American Parkway. I'm very familiar with core of engineers projects since 989 of it had a construction management consulting business, and worked on several 4 projects and worked in several restoration projects but I really didn't see sort of the depth of.

718 "Mark Berry" (3343273728)
01:48:14.400 --> 01:48:17.490
Analysis from, you know.

719 "Mark Berry" (3343273728)
01:48:17.490 --> 01:48:34.800
The National ring, fisheries and U. S fish and wildlife I would expect on a river that's a designated, uh, you know, wild salmon river habitat. So I was wondering if, uh, if those could be included and if they are maybe.

720 "Mark Berry" (3343273728)
01:48:34.800 --> 01:48:41.980
Uh, you can direct direct me or, you know, I made comments here that maybe direct, uh, where those actually are in the report. If they are.

721 "Keleigh Duey" (2750604800)
01:48:41.980 --> 01:48:49.380
Here okay, thank you. Mark MaryAnne.

722 "Keleigh Duey" (2750604800)
01:49:01.950 --> 01:49:06.353
Maryann, I sent you the request to unmute.

723 "maryann" (3477399040)
01:49:06.353 --> 01:49:10.829
Are you are.

724 "maryann" (3477399040)
01:49:10.829 --> 01:49:18.270
I can hear you. Oh, right. I was in Santa Cruz when the Army Corps of engineers came along and decided to.

725 "maryann" (3477399040)
01:49:18.270 --> 01:49:23.550
Put in an extension of the harbor and.

726 "maryann" (3477399040)
01:49:23.550 --> 01:49:30.360
What they did when they were putting in the extension and all this huge rocks.

727 "maryann" (3477399040)

01:49:30.360 --> 01:49:33.420

The surface said, hey, you doing it the wrong direction.

728 "maryann" (3477399040)

01:49:33.420 --> 01:49:39.480

Well, they went ahead with the project because their engineers said it was right direction.

729 "maryann" (3477399040)

01:49:39.480 --> 01:49:45.000

They didn't listen to the comments of the people that actually were in the water every single day.

730 "maryann" (3477399040)

01:49:45.000 --> 01:49:52.020

And so what they had to do is they come back every other year, and they dredge the harbor to keep the harbor open.

731 "maryann" (3477399040)

01:49:52.020 --> 01:49:59.430

A tremendous cost to the voters and the people, Santa Cruz, and destroys the beach area.

732 "maryann" (3477399040)

01:49:59.430 --> 01:50:15.270

That's just 1 comment in 2008. I was a teacher and I was working with students and I had a visit from the Army Corps of engineers, and they were talking about how, when they decided to do.

733 "maryann" (3477399040)

01:50:15.270 --> 01:50:21.090

Their river control in San Jose, they, they didn't do the river control.

734 "maryann" (3477399040)

01:50:21.090 --> 01:50:25.860

Properly and they, they realize that all of these.

735 "maryann" (3477399040)

01:50:25.860 --> 01:50:31.320

Big pipe bigger pipes that were channeling in the water.

736 "maryann" (3477399040)

01:50:31.320 --> 01:50:39.840

That on heavy water years, those things got just pushed around in the water and ended up causing more flood damage. Now they had to be removed.

737 "maryann" (3477399040)

01:50:39.840 --> 01:50:54.420

And so that was an extra cost. I believe that if this project is allowed to go forward, the cost could be the end of set of Sacramento, having any kind of a designation as a place you want to go to.

738 "maryann" (3477399040)

01:50:54.420 --> 01:50:59.040
It won't be a place of trees because the 1 area.

739 "maryann" (3477399040)
01:50:59.040 --> 01:51:03.600
That really is. It is beautiful. And and.

740 "maryann" (3477399040)
01:51:03.600 --> 01:51:07.830
And has passed all of these stages of time.

741 "maryann" (3477399040)
01:51:07.830 --> 01:51:12.060
And kind of gives us this wonderful.

742 "maryann" (3477399040)
01:51:12.060 --> 01:51:15.510
Corridor that, you know.

743 "maryann" (3477399040)
01:51:15.510 --> 01:51:18.570
It's not just the kids it's.

744 "maryann" (3477399040)
01:51:18.570 --> 01:51:27.480
The birds, the animals and the possibility of controlling some of the
heat that goes to this area.

745 "maryann" (3477399040)
01:51:27.480 --> 01:51:33.060
And finally, I know that I'm not really connecting my thoughts, but.

746 "maryann" (3477399040)
01:51:33.060 --> 01:51:39.270
Finally, this this area, the river has gone through some major stressors.
There was this huge.

747 "maryann" (3477399040)
01:51:39.270 --> 01:51:56.070
Storm search that we had last year, and before that there were many years
of drought, and there's been lots of fires that have really affected the
quarter. So I really feel like the damages have happened and it's still
trying to recover.

748 "maryann" (3477399040)
01:51:56.070 --> 01:52:03.950
So this is the wrong time and and that's why I think we need a targeted
approach.

749 "Keleigh Duey" (2750604800)
01:52:03.950 --> 01:52:09.150
And thank you for listening. Thank you. Marianne.

750 "Keleigh Duey" (2750604800)

01:52:09.150 --> 01:52:14.100

Is there anyone else? Um, I don't see that. We have any more hands up.

751 "Keleigh Duey" (2750604800)

01:52:20.400 --> 01:52:24.960

Give it another 2nd, if anyone has any final thoughts, um.

752 "Keleigh Duey" (2750604800)

01:52:24.960 --> 01:52:33.392

See, hey, 1, last 1 Ellen.

753 "Ellen Ganz" (2390902272)

01:52:33.392 --> 01:52:43.140

Thank you it was just there's been a couple of very specific questions asked in the comments that keep coming up.

754 "Ellen Ganz" (2390902272)

01:52:43.140 --> 01:52:51.711

I am wondering if there's anything you can do to get some of these answers for the next meeting on the 60.

755 "Keleigh Duey" (2750604800)

01:52:53.790 --> 01:53:13.790

Um, I see another hand up. Um, yeah, so once we're done with this, we're gonna pull this entire chat off and we'll start going through it. Um, the next meetings on the 16th, which doesn't give us a lot of time to be able to answer all these questions. We're going to prioritize people who need help.

756 "Keleigh Duey" (2750604800)

01:53:13.790 --> 01:53:24.707

Paying access to your resource in order to provide, like, a full written comment. So, that's what we're going to start with. Um, and then our plan is to provide full responses, um, after that public comment, period ends, which is right now.

757 "Ellen Ganz" (2390902272)

01:53:24.707 --> 01:53:32.760

February 5th, but how can we make a full comment without having these questions answered?

758 "Ellen Ganz" (2390902272)

01:53:32.760 --> 01:53:39.472

Yeah, because you're saying that we don't get the answers to our questions until after we've submitted our.

759 "Keleigh Duey" (2750604800)

01:53:39.472 --> 01:54:00.200

Comments oh, sorry. I might I might be misunderstanding and it's a little hard. I haven't been able to monitor the chat. Well, um, there's other people monitoring the chat right now. So so, people who have asked questions, um, we're gonna still consider anything in the chat is the part of the public record. So that will still go into our comment matrix that will be responded.

760 "Keleigh Duey" (2750604800)

01:54:00.200 --> 01:54:12.720

To after the public comment, period ends. Okay. Um, just like everything that's been. Verbalized. Um, but right now before you're asking before the 16th, we're not going to be able to respond to all of these, um.

761 "Keleigh Duey" (2750604800)

01:54:12.720 --> 01:54:25.707

We'll do our best to, um, if there's something, you know, you want to find this document that was listed as a citation, you can't find it yourself, things like that. We'll do our best to get to, you.

762 "Ellen Ganz" (2390902272)

01:54:25.707 --> 01:54:32.720

Soon as we can before the public comment, period ends. So isn't any way to have any real communication just how to get.

763 "Ellen Ganz" (2390902272)

01:54:32.720 --> 01:54:35.820

That's what this meeting.

764 "Ellen Ganz" (2390902272)

01:54:35.820 --> 01:54:40.709

Um, just clever.

765 "Keleigh Duey" (2750604800)

01:54:40.709 --> 01:54:55.820

There's a lot of things on the chat, um, without like, seeing the specific 1. I can't say that I can answer all of these right now, you know, but we want to make sure that you can provide you have every.

766 "Keleigh Duey" (2750604800)

01:54:55.820 --> 01:55:03.120

You need to provide a full written comment, uh, as much information as you need to get that done. That's what we want to provide to you. Okay.

767 "Keleigh Duey" (2750604800)

01:55:03.120 --> 01:55:12.900

All right, I see like, there's more hands up so I only have, I can only stay on for 15 more minutes. Um.

768 "Keleigh Duey" (2750604800)

01:55:12.900 --> 01:55:18.510

With the rest of my crew, so I am going to move on to, em, be sure.

769 "maryann" (3477399040)

01:55:18.510 --> 01:55:25.629

The army complex mistakes.

770 "Keleigh Duey" (2750604800)

01:55:25.629 --> 01:55:34.290

M. B. schuber. Okay. I've sent, um.

771 "Keleigh Duey" (2750604800)

01:55:34.290 --> 01:55:39.150

I've sent you a request on mute.

772 "M B Schwehr" (4272895232)

01:55:55.011 --> 01:56:02.210

There we go now, I think finally it let me unmute. Okay it was telling me.

773 "Keleigh Duey" (2750604800)

01:56:02.210 --> 01:56:04.104

I could not unmute myself.

774 "M B Schwehr" (4272895232)

01:56:04.104 --> 01:56:23.930

Sorry about that my name is Mary Beth where I'm a 35 year plus resident in the South project area. I'm on the board of our townhouse association couple of masters degrees from U. C. Berkeley. I have a career of 35+years in the in the technical field of air pollution, writing regulations, and protecting the public from.

775 "M B Schwehr" (4272895232)

01:56:23.930 --> 01:56:43.930

6, and including cancer causing diesel exhaust and risk assessment. Um, and I want to comment on the disproportionately high risks that children face, when exposed to toxics. So, I really question the disproportionate lifetime risk that's being added to the K, through 6 children at early 1 in school, right? Next to the large month staging area of the heavy.

776 "M B Schwehr" (4272895232)

01:56:43.930 --> 01:57:03.930

Equipment, I also don't think I saw use of California, diesel cancer potency factor, which is actually higher than what you get using epa's. Um, I agree with most of the comments that I've heard today already. Um, I truly drive my assistants from my daily time on the river. It has astonishing wilderness level, natural attributes and wildlife.

777 "M B Schwehr" (4272895232)

01:57:03.930 --> 01:57:23.930

If people are amazed to find that they survive here, and I'm very concerned about this character, even surviving with this extended creep of destruction into the wildlife corridor. My home's immediately adjacent property to this project on South Bank of reach for 1. I absolutely care about flood safety.

778 "M B Schwehr" (4272895232)

01:57:23.930 --> 01:57:43.930

But I assure you from everything I've seen, I will feel much less safe if the interwoven renewable natural armoring network, that protects the bank all the way down from the water's edge all the way up to the top is replaced with buried rocks on top with poor soil on top and a planting bench, there are a lot of big.

779 "M B Schwehr" (4272895232)

01:57:43.930 --> 01:58:03.930

Psychological rock toes, there can be issues of scouring at the ends. So the project links miles of them together, which then means you need big

earth, moving equipment and more rocks, which means bigger trucks, which means staging areas next to schools and hall roads, the damage, roads and levies. And the worst part is that the planting benches are on the same foundations.

780 "M B Schwehr" (4272895232)

01:58:03.930 --> 01:58:16.980

So, if the launch double rocks, ever do need to launch, we will lose the planting bench with them. And in a prior project, the core was asked, would that be repaired? And there has not been an answer yet to anyone's knowledge.

781 "M B Schwehr" (4272895232)

01:58:16.980 --> 01:58:36.980

Being here over 35 years I've lived through a lot of atmospheric rivers and high flows, and our levies in river banks have had no issues even before all the additional fortification of slurry walls that go down 60 feet, deep inside the levies and all the great improvements. That allow Folsom dam to manage the whole whole atmospheric river.

782 "M B Schwehr" (4272895232)

01:58:36.980 --> 01:58:56.980

So much better, they can release water soon ahead of time when we can see storms coming. It's, it's so much more improvement that we that that has already been done there. There doesn't seem to be any need here for this. It doesn't make sense. Some of the Army Corps projects in the larger area did make sense, but not here. I do want to command your environmental.

783 "M B Schwehr" (4272895232)

01:58:56.980 --> 01:59:16.980

For trying to do damage control, but I think you've been handed a raw deal by higher decisions that really are trying to do 1 size fits all and over generalized data. It just doesn't make sense to do miles of bulldozing in a stretch of river. That might have at most, a couple of spots. This stretch is truly different than other project areas elsewhere in Sacramento.

784 "M B Schwehr" (4272895232)

01:59:16.980 --> 01:59:36.980

Just don't see the compelling need here. If you, you don't have to be a scientist to look at the data, the cores on captions on the figures. Say, seepage no problem here. These logical rock toes haven't even been time tested in the other areas yet. So, we don't even know for sure how they will fare in our river environment. And now we're continuing them before we even know.

785 "M B Schwehr" (4272895232)

01:59:36.980 --> 01:59:56.980

That, um, the is a bit of a catch all uh, I just don't see that. This makes sense here. Um, I also wanted to mention that the 2011 revetment does not has not come back after 13 years looking anything like the mix of species. That was there before, and I will point out that your access ramps.

786 "M B Schwehr" (4272895232)

01:59:56.980 --> 02:00:16.980

We're in an earlier map, and we're being told that they're not going to be available in the draft environmental document, but those access ramps themselves, threaten a number of of prime heritage, Oaks, and a number of other trees. So, how can we evaluate a project that doesn't have the results of the access ramps? We're told that they would not appear in probably until.

787 "M B Schwehr" (4272895232)

02:00:16.980 --> 02:00:21.600

But the, the final SCS, which is outside of the public comment, period.

788 "M B Schwehr" (4272895232)

02:00:21.600 --> 02:00:41.600

85

So, I really appreciate your time. I understand you guys have a tough job to do. I think we need to have these meetings in person meetings with the engineers who are actually making some of these decisions and I encourage you to pull out some of those upper sub components on the East end of contract South that just don't.

789 "M B Schwehr" (4272895232)

02:00:41.600 --> 02:00:54.180

86

Really make any sense. It's a straight stretch of river, low flow velocities. No seepage data that shows any concern. Um, and do surgical kind of approaches in a few places if ever needed. Thank you for your time.

790 "J. Paul Bruton" (3550220544)

02:01:05.312 --> 02:01:09.409

Do we have any other questions.

791 "Jaime" (1530478336)

02:01:09.409 --> 02:01:13.314

Oh, yes. Can you hear me.

792 "Jaime" (1530478336)

02:01:14.793 --> 02:01:36.290

Yes, hi, my name is Jamie. Jamie Becker, I live in contract 3 B, against the Levy and it's going to be pretty short. Sweet to the point and a 2nd, everyone's comments here and also probably everyone else feels the same. I'm not only concerned, but I'm outraged by the idea of the.

793 "Jaime" (1530478336)

02:01:36.290 --> 02:01:56.290

87

This plan and project. Does everyone remember 2020? I know. It seems like it was so long ago, but not so long ago but this was a refuge. The river was a refuge for people. I mean, we're all stuck in our houses to be able to get out and go to the river and utilize it for.

794 "Jaime" (1530478336)

02:01:56.290 --> 02:02:06.540

Not only mental health, you know, recreation and it's my sanctuary. I use the river constantly. I am out there so that's my short and sweet statement.

795 "Jaime" (1530478336)

02:02:06.540 --> 02:02:09.690

And I'm, I'm pretty sure everyone else feels the same way.

796 "Keleigh Duey" (2750604800)

02:02:13.271 --> 02:02:18.960

Thank you. I see 1 more hand up Brenda.

797 "Keleigh Duey" (2750604800)

02:02:29.280 --> 02:02:32.697

I will put that through again.

798 "Brenda Gustin" (4233067008)

02:02:32.697 --> 02:02:44.010

Thank you now, I got it. Thank you. Thank you. kaley. You're on the 1st line tonight on the front line. Um.

799 "Brenda Gustin" (4233067008)

02:02:44.010 --> 02:02:53.520

Don't know, if you expected to hear so many people, and I am completely impressed with the talent the expertise.

800 "Brenda Gustin" (4233067008)

02:02:53.520 --> 02:03:13.520

Oh, that is present here on the call and I hope that the core can see this. So I think that a really great approach on a just a pragmatic way is for you to, of course. Look at all these questions. Yeah, also by next Tuesday at the meeting, have the core.

801 "Brenda Gustin" (4233067008)

02:03:13.520 --> 02:03:26.280

If possible through your process, decide to extend the periods here, because the people here that have all this expertise and knowledge that are locals really need to.

802 "Brenda Gustin" (4233067008)

02:03:26.280 --> 02:03:46.280

Be hurt and be participating in this project. I'm a native Sacramento and, um, lived here. We have, you know, the 100 year flood plain the 200 year. Floodplain. There's many many ways to care for this area. We're dealing with climate.

803 "Brenda Gustin" (4233067008)

02:03:46.280 --> 02:03:55.680

Change that is unprecedented and I just don't see that this project is really going to help what we don't know is coming.

804 "Brenda Gustin" (4233067008)

02:03:55.680 --> 02:04:12.377

So, not 1 of those experts, but, um, I sure do honor and all the people that are here and I support, um, the public being participants in this. So thank you for making it possible. And I hope you'll make it more possible.

805 "Keleigh Duey" (2750604800)

02:04:12.377 --> 02:04:27.260

For us to be involved. Thanks, Brenda. Sure. So I'm going to take 1 last comment from Pete, and then I want to have just kind of 5 minutes to wrap it up. Okay, so I'm going to unmute you.

806 "pete" (3839514368)

02:04:27.260 --> 02:04:45.180

Okay, okay I figured that out this time, I want to expand on what Brenda just said. You know, naturally we've been spreading the word about these meetings tonight and next week for next week's meeting.

807 "pete" (3839514368)

02:04:45.180 --> 02:05:05.180

It would be great if there could be some of the technical people from the core on board and maybe an open question to you. Kelly, can you give us any guidance? We don't want to. At least, I don't want to repeat the same thing next week that I said tonight, I'll have other things to delve into by then, but.

808 "pete" (3839514368)

02:05:05.180 --> 02:05:19.720

Can you give us any guidance on next week, or can you kind of really encourage the core to get some technical folks on to listen to concerns directly? And I'll leave it at that and thanks a lot. I know you're working late tonight.

from J. Paul Bruton to everyone: 4:42 PM

<https://www.spk.usace.army.mil/Missions/Civil-Works/Sacramento-Levee-Upgrades/>

from Daniel Airola to everyone: 5:02 PM

Is anyone talking? I am not hearing anyone

from Keleigh Duey to everyone: 5:05 PM

Good evening. We will be starting at 5:30pm. The staff are working to get the presentation set up. Feel free to get a drink and a snack and come back shortly.

from Daniel Airola to everyone: 5:05 PM

Has the meeting started? I am still not hearing anyone. Do I need to be let in or activated?

from Daniel Airola to everyone: 5:05 PM

My apologies. I thought it started at 5:00. Thank you.

from Keleigh Duey to everyone: 5:06 PM

No problem at all. We're glad you are here. It will be quiet for at least another 15-20 minutes.

from Keleigh Duey to everyone: 5:19 PM

Good evening. As more people join, we ask you to turn off your camera so that we have the internet capacity and bandwidth to support this presentation. If you would like to turn your video on during the public participation portion we encourage it.

from Michelle Stevens to everyone: 5:28 PM

Is there any sound?

from Dana Conway to everyone: 5:29 PM

i am not hearing anything either yet

from Laurie Langham to everyone: 5:29 PM

I'm not getting any sound either

from Keleigh Duey to everyone: 5:29 PM

Not yet. We're almost ready!

from pete (privately): 5:33 PM

Did you ask us to turn off video if we are not speaking to preserve bandwidth.

to Keleigh Duey (privately): 5:35 PM

I take it can you hear it?

from Keleigh Duey (privately): 5:35 PM

Yes sounds good.

to pete (privately): 5:38 PM

yes please

from pete (privately): 5:39 PM

OK, done!

to pete (privately): 5:39 PM

thanks!

from Naomi E to everyone: 5:41 PM

glad to be here! save the trees & parkway!!!

from Naomi E to everyone: 5:43 PM

who is the person presenting?

from Keleigh Duey to everyone: 5:44 PM

Welcome, thank you for joining. This is a pre-recorded segment of the presentation. This part is presented by myself, Keleigh Duey.

from Laurie Langham to everyone: 5:46 PM

1 | These maps are unreadable...too small

from Bonnie D to everyone: 5:46 PM

+1

from Keleigh Duey to everyone: 5:47 PM

Thank you for that feedback. Apologies for the map size. You can zoom in at the upper portion of the screen. Click the + button.

from Patrick Vanek-McGillivray to everyone: 5:47 PM

Hang tight, connection is poor.

from Naomi E to everyone: 5:47 PM

2 | can you email this information to all participants please?

from JGabele to everyone: 5:47 PM

We can not hear speaker nor see presentation

from Jim Morgan to everyone: 5:47 PM

Just lost the screen share

from Andrea Meier to everyone: 5:47 PM

Audio cut out

from Annette to everyone: 5:47 PM

Yes?

from pete (privately): 5:47 PM

Lost video and audio

from Jaime to everyone: 5:47 PM

can't hear or see the presentation

from Joshua Thomas to everyone: 5:48 PM

Audio cut out at 5:47

from Patrick Vanek-McGillivray to everyone: 5:48 PM

Please shut off your video to preserve bandwidth.

from Gerald Djuth to everyone: 5:48 PM

Presentation lost

from Daniel Airola to everyone: 5:48 PM

Audio gone for me too

from Bill Brattain to everyone: 5:48 PM

The host is muted

from Andrea Willey, MD (privately): 5:48 PM

I LOST CONECTION ANYONE ELSE?no video or audio

from JGabele to everyone: 5:48 PM

audio gone for me as well

from Annette to everyone: 5:48 PM

No sound. Please start over.

from Bruce Gervais to everyone: 5:48 PM

No video No audio

from Linda to everyone: 5:48 PM

me too

from Daniel Airola to everyone: 5:48 PM

yes

from Jaime to everyone: 5:48 PM

yes

from Jim Morgan to everyone: 5:48 PM

Yes

from Bill Brattain to everyone: 5:48 PM

Yes

from E Sunahara to everyone: 5:48 PM

Yes can hear Kelly

from Gregg Fishman to everyone: 5:48 PM

yes

from Bruce Gervais to everyone: 5:48 PM

Spekaer is gone

from Andrea Willey, MD (privately): 5:48 PM

i hear youy but lost the last one

from JGabele to everyone: 5:48 PM

just starting to hear audio, no visual

from Sarah Norris to everyone: 5:48 PM

The map scale presented on the slide is the same map scale presented in the SEIS/SEIR.

from Dave to everyone: 5:49 PM

no audio, no video

from Andrea Willey, MD to everyone: 5:49 PM

yes!!

from Bruce Gervais to everyone: 5:49 PM

Great question!

from Elton Grau to everyone: 5:49 PM

i agree

from Joshua Thomas to everyone: 5:49 PM

Agree!

from Bruce Gervais to everyone: 5:49 PM

I agree

from Geoff Benn to everyone: 5:50 PM

Agree

from Mikkell Herholdt Jensen to everyone: 5:50 PM

agreed

from Sherri Sandberg to everyone: 5:50 PM

Not good for salmon either.

from David B to everyone: 5:50 PM

Exactly

from Ellen Ganz to everyone: 5:50 PM

Thank you Maryann- yes we want to please keep our natural areas for our kids to play

from E Sunahara to everyone: 5:50 PM

3 | Agreed, would love more specific site by site/tree by tree assessment.

from Bruce Gervais to everyone: 5:50 PM

Short answer: it will look the same

from Annette to everyone: 5:50 PM

AGREE!!!!

from Sherri Sandberg to everyone: 5:50 PM

Trees take a long time to grow.

from Linda to everyone: 5:50 PM

can't hear audio

from Joshua Thomas to everyone: 5:50 PM

You said the same at the December meeting of the Lower American Task Force and did not answer questions

from Chris Enright to everyone: 5:50 PM

Great question

from Naomi E to everyone: 5:50 PM

- 4 | please tell us EVERY tree you plan to remove. this information is shared with the tree cutters.
we need this information ASAP. as well as a scientific justification & opportunities to share alternatives to cutting down the trees

from Andrea Willey, MD to everyone: 5:50 PM

- 5 | there are trees for roosting waterbirds that are vital and need to be protected!

from Linda to everyone: 5:51 PM

can hear and see now

from Annette to everyone: 5:51 PM

Agree!

from Karen Zamd to everyone: 5:51 PM

Can you please confirm there will be time for participation no matter the finish time of the presentation?

from Joshua Thomas to everyone: 5:51 PM

- 6 | You will replant on planting benches that will collapse when rock trenches and toes launch

from Daniel Airola to everyone: 5:51 PM

- 7 | There are a lot of issues which will be in our comment letter. The main one is that the period for public comment, opened 3 days before Christmas, is completely inadequate and needs to be extended by at least 45 day.

from Brenda Gustin to everyone: 5:52 PM

- 8 | Replanting takes years to replace the trees and habitat and from what I've seen, it will not be "natural" habitat.

from Naomi E to everyone: 5:52 PM

- 9 | I live by the current Project near Sacramento State University & have already seen Bank erosion where the trees were removed!!

from JGabele to everyone: 5:52 PM

- 10 | There really needs to be an in-person public meeting, not just virtual - your graphics, maps, documents missing a lot of detail public and peer agencies need

from Annette to everyone: 5:52 PM

yes

from Joshua Thomas to everyone: 5:52 PM

- 11 | Every other project got its own SEIS or SEA. Why were 6 projects, some multiple subcomponents, combined in this one SEIS which was released over the holiday season? It's too complex to review in 45 days. We need an extension of the public comment period!

from Keleigh Duey to everyone: 5:52 PM

There will be time beyond 6:30 pm for public participation, if needed, yes.

from Chris Enright to everyone: 5:52 PM

- 12 | I agree, an in - person forum is essential

from Annette to everyone: 5:53 PM

- 13 | We need 45-60 days to properly read over this project.

from Naomi E to everyone: 5:53 PM

- 14 | agree with the need for an extension & also for in-person meeting

from Keleigh Duey to everyone: 5:53 PM

I am seeing comments regarding comment period extension and an in-person meeting. I have captured those.

from Brenda Gustin to everyone: 5:53 PM

- 15 | True: "there are trees for roosting waterbirds that are vital and need to be protected!"

from Eliza J. Morris to everyone: 5:53 PM

- 16 | One thing that I absolutely want to make sure is addressed is how those of us who need to use the 3B south levy for commuting we be able to access that space during construction.

from Andrea Willey, MD to everyone: 5:54 PM

- 17 | grasses cannot serve as roosting sites for waterbirds- you must provide trees.

from pete (privately): 5:54 PM

- 18 | Given the complexity of these projects, and the huge area they cover, especially Contracts 3B north and south, 4A and 4 B, can SAFCA, DWR and CVFPB have a in person public meeting to inform more of the public and get all questions asked and answered?

from Sherri Sandberg to everyone: 5:54 PM

- 19 | Chinook salmon are struggling with warm water. Salmon need shade from mature trees to help with water cooling.

from Annette to everyone: 5:54 PM

This is too small

from Michelle Stevens to everyone: 5:54 PM

Five maps on one slide??? So hard to read!

from JGabele to everyone: 5:55 PM

what alternative were you recommending for each segment

from Keleigh Duey to everyone: 5:55 PM

If you could please stop your video until the public participation segment, so we can avoid any further disruption. Thank you all!

from Sarah Norris to everyone: 5:56 PM

20 | Note that this figure while small and difficult to read is useful for side-by-side comparison of alternatives and this image is not in the SEIS/SEIR.

from Joshua Thomas to everyone: 5:56 PM

21 | You are rushing through all these contracts because there are too many projects in this SEIS. One hour to discuss six complex projects is too little.

from Peter J Connelly to everyone: 5:56 PM

i am asking to confirm the staging area location at the 3b south, immediately adjacent to residences that would be used for large rock type materials and equipment .. is there any geotechnical data indicating the potential risk of damage to pools and structures

from JGabele to everyone: 5:56 PM

22 | is contract 3 - same as contract 3B

from Daniel Airola to everyone: 5:57 PM

23 | I saw 60 cormorats tonight at the roost in trees overhanging the river within Area 3a. This site is used by up to 100 cormorants throughout the winter. It appears that these trees will be removed. This impact was not addressed in the DEIS/DEIR

from Naomi E to everyone: 5:57 PM

24 | still haven't gotten answers for the current project happening near Sacramento State University. signs went up AFTER trees were cut down. AND those signs gave ni indication of the future project work upstream of Howe Ave (between howe & watt, beyond watt, etc). why was this future project work NOT included on the signs that were posted near Sacramento State University?

from Chris Enright to everyone: 5:57 PM

25 | The surveys mentioned earlier defined "reaches" far too broadly. The linear scale of erosion risk locations is on the order of tens of meters, not miles. The majority of riparian river edges are not demonstrably at risk of erosion.

from Naomi E to everyone: 5:57 PM

yes I see those cormorants there too. their favorite spot!

from sara denzler to everyone: 5:58 PM

26 | Your slide does not list what the impact to wildlife/fisheries would be. It just says it's necessary.

from Andrea Willey, MD to everyone: 5:59 PM

27 | Please halt any action in area 3a until the waterbird roosting can be addressed.

from Annette to everyone: 5:59 PM

28 | Smaller truck and earth movers are needed to reduce this extreme damage to the riparian areas. Target where the flood risk is higher. Not the whole area.

from Mikkel Herholdt Jensen to everyone: 5:59 PM

29 | How much of the Sacramento River project is to accommodate additional flow from Folsom?

from Bill Brattain to everyone: 5:59 PM

30 | For Contract 3B south RM 10.5 at Larchmont Park, the 2017 Lower American River Streambank Monitoring Report prepared for the American River Flood Control District found that erosion at this site does not threaten the levee due to the width of the berm. Why then is launchable rock needed that will destroy a dozen heritage oaks?

from Bruce Gervais to everyone: 6:00 PM

31 | Misleading photo sequence: that rip rap is NOT normal/soil rich riparian habitat

from Nathan Davis to everyone: 6:00 PM

32 | I second Bill Brattain's question. Thanks Bill.

from Mikkel Herholdt Jensen to everyone: 6:00 PM

33 | I suspect it's because the intent is to accommodate a larger flow? Essentially turn the river into more of a canal? Can you please address this?

from Andrea Willey, MD to everyone: 6:00 PM

34 | There is no need to destroy the Heritage Oaks as the levee has been fortified already.

from Annette to everyone: 6:00 PM

35 | I see these "recovery areas" but where are the 200 year old oaks?

from Joshua Thomas to everyone: 6:00 PM

36 | The mitigation you did near Sacramento State after 2001 is not relevant here. Those revetments were cobblestones, which trees can grow around. The big, angular rocks you're using for the rock trenches and toes are very different. The planting benches are an unproven form of mitigation.

from Joshua Thomas to everyone: 6:01 PM

37 | Again, an irrelevant example because the 2001 revetments were different from the ones proposed for Contract 3B. Trees don't grow around big, angular rocks.

from trent to everyone: 6:02 PM

38 | Sacramento residents do not support this intrusive way of working on OUR parkway!

from Amy DavisCourt to everyone: 6:02 PM

39 | RE: hydroseeding. Is it possible to include a native grass and pollinator-friendly mixture in your hydroseeding specifications for additional biological and public benefit? I think that would be a low-cost, high-benefit mitigation.

from Sherri Sandberg to everyone: 6:02 PM

40 | Riparian habitat is already so limited as a narrow ribbon along waterways. Due to heat and drought, this is a bad time to remove mature riparian habitat.

from Karen Zamd to everyone: 6:03 PM

41 | When the environmental impacts were assessed, were those based on leaving some vegetation at each of the construction areas or were they based on leaving some vegetation as noted in previous presentations?

from Karen Zamd to everyone: 6:03 PM

42 | Sorry, or based on complete removal?

from Naomi E to everyone: 6:04 PM

43 | I live near the current project work by Sacramento State University. the noise & vibration from project work was INTOLERABLE. My entire apartment building shook. they had to put up motion sensors to make sure structural damage was not being done to the building. Sadly, these motion sensors were put in AFTER the majority of ground-shaking work was done

from Annette to everyone: 6:04 PM

44 | I understand there is a nesting eagle pair in this pond area. They will not tolerate this construction.

from Nancy MacKenzie to everyone: 6:04 PM

45 | please tell us again where this mitigation site is located. thank you.

from JGabele to everyone: 6:05 PM

46 | Please clarify if mitigation site by discovery park is what you are proposing for Contract 3B destruction

from Michelle Stevens to everyone: 6:05 PM

47 | Plants, esp trees and shrubs, will not re-establish within one year or growing season

from Naomi E to everyone: 6:05 PM

48 | strongly oppose this intrusive, unnecessary & horribly destructive plan

from Daniel Airola to everyone: 6:05 PM

49 | This project component will eliminate a key nighttime roosting habitat for diving ducks and other species. A high proportion of the goldeneyes, buffleheads, and mergansers that use the lower American River use this pond and will no longer be able to do so under the proposed action

from Andrea Willey, MD (privately): 6:06 PM

50 | This project component will eliminate a key nighttime roosting habitat for diving ducks and other species. A high proportion of the goldeneyes, buffleheads, and mergansers that use the lower American River use this pond and will no longer be able to do so under the proposed action

from Daniel Airola to everyone: 6:06 PM

51 | 4b will not provide a good nightroosting waterbirds because it is too narrow and waterbird need a safe buffer from the shoreline

from William Avery to everyone: 6:07 PM

52 | Where do imported soils come from. Where do the launchable rocks come from. Which quarry specifically.

from Andrea Willey, MD (privately): 6:07 PM

4b will not provide a good nightroosting waterbirds because it is too narrow and waterbird need a safe buffer from the shoreline

from Brenda Gustin to everyone: 6:07 PM

53 | This project is complex and needs an extension with in-person public events for questions and answers to be addressed. These changes will destroy wildlife habitat that will then take decades to recreate. It makes no sense that this agency will not weigh in and protect floodways upriver but will instead, destroy the natural habitat, raise temperature for habitat living in the Wild and Scenic American River and possibly break laws protecting this wild and scenic river and disturb cultural resources known to be present.

from Daniel Airola to everyone: 6:08 PM

55 | Design should have two connections to the river on either side of the eagle nest and retain the pond remnant in the center portion of the current pond, which would allow it to have a more rounded configuration, which would serve roosting waterbirds

from sara denzler to everyone: 6:08 PM

I second Brenda Gustin's comment.

from Sarah Norris to everyone: 6:08 PM

56 | Please explain to the public what it means that these ARMS Alternatives were advanced only under CEQA and dismissed under NEPA.

from Andrea Willey, MD (privately): 6:08 PM

57 | This project is complex and needs an extension with in-person public events for questions and
58 | answers to be addressed. These changes will destroy wildlife habitat that will then take decades
to recreate. It makes no sense that this agency will not weigh in and protect floodways upriver
but will instead, destroy the natural habitat, raise temperature for habitat living in the Wild and
Scenic American River and possibly break laws protecting this wild and scenic river and disturb
cultural resources known to be present.

from Amy Davis court to everyone: 6:08 PM

I agree Daniel.

from Bruce Gervais to everyone: 6:08 PM

Only the courts can stop it.

from Naomi E to everyone: 6:09 PM

how do we get the courts involved?

from Brenda Gustin to everyone: 6:09 PM

59 | Agreed: "Chinnok salmon are struggling with warm water. Salmon need shade from mature trees
to help with water cooling."

from Amy Davis court to everyone: 6:10 PM

60 | Where there is already going to be changes made to the levee itself, will the geotextile be
confirmed rodent-proof?

from William Avery to everyone: 6:11 PM

61 | Where can we find a map of the exact locations of piezometer stations?

from Daniel Airola to everyone: 6:11 PM

62 | A portion of the pond should be retained and mitigation should go elsewhere. It seems
misleading to say that you don't have adequate area for mitigation elsewhere. It's just more
expensive to construct. We believe that the impacts to waterbird resting habitat at Urrutia pond
are significant and will need to be mitigated, which will cost a lot. So just avoid the impacts and
move elsewhere, such as the extensive high terrace lands around Cal-Expo

from Peggy McKeon to everyone: 6:11 PM

63 | I agree with B Gervais, this should be decided by the courts.

from Bruce Gervais to everyone: 6:11 PM

64 | The north bank at Sac State is going to be extremely hot and barren this summer. It is a lunar landscape. All of the work they are doing is absolutely butchering the river's beauty and life. They are literally destroying our river.

from L Merritt MD to everyone: 6:11 PM

65 | So what are the impacts to cultural resources and what is the plan to honor and preserve them?

from Joshua Thomas to everyone: 6:11 PM

66 | You spent like 2 seconds on contract 3b south, where you are going to bulldoze 522 trees as well as potentially several 200+ year old heritage oak trees. Such devastation requires much more thorough explanation and discussion with the public. We should have public meetings for each subcomponent of the December 2023 SEIS/SEIR

from Chris Enright to everyone: 6:11 PM

67 | Does the piezometer network have a pre-project baseline to compare to? I gather the answer is no. Measuring the performance of the project without a baseline comparison is not a reasonable approach.

from Bruce Gervais to everyone: 6:12 PM

I second Joshua's comment/question

from Dale Steele to everyone: 6:12 PM

68 | The comment period includes the holiday season and is inadequate for a complex project such as this. More time is needed now.

from William Avery to everyone: 6:12 PM

69 | Kadema is the site of two Nisenan tribal round houses. The riparian area there is the last remnant of their original forests.

from Karen Zamd to everyone: 6:12 PM

70 | Where is the detailed presentation for 3B south?

from Nancy MacKenzie to everyone: 6:12 PM

71 | need to extend public comment period since it fell during the holidays and therefore hasn't provided enough time to review this complex document and prepare comments.

from Daniel Airola to everyone: 6:12 PM

72 | Was selection of the comment period to include the holidays done specifically to discourage public involvement? An extension is needed

from L Merritt MD to everyone: 6:12 PM

73 | We were given incorrect contact information, and it was just prior to the holidays, is there any possibility to extend the comment period to permit adequate time to review, comprehend this extensive project?

from Michelle Stevens to everyone: 6:13 PM

74 | OK, here goes for NW pond turtle. The USFWS have proposed listing as Threatened under FESA. Here are problems: 1) turtles are brumating now, from Dec to late Feb. If construction done during this period, turtles killed. 2) Turtles nest from April to late July, and females utilize fairly long distances between terrestrial and aquatic habitat. Possible strikes of turtles by bikes and cars, destruction of nesting habitat? 3) Mitigation should augment basking sites and along the river. None of this is included in environmental documentation, so recommend delay to consider.

from Naomi E to everyone: 6:13 PM

75 | UNREASONABLE to expect working public to analyze all this information in such a short time. please extend comment period

from William Avery to everyone: 6:13 PM

76 | Too many projects. Need extension.

from L Merritt MD to everyone: 6:13 PM

77 | So 3 years of disruption 2024-2027 anticipated?

from Joshua Thomas to everyone: 6:13 PM

78 | one hour to discuss 8 different projects! We need public outreach for each project, and at LEAST 45 days for public comment.

from Dale Steele to everyone: 6:14 PM

79 | The construction schedule doesn't show when mitigation will be initiated and completed. This project is in a very sensitive environment and mitigation should be fully established and functional before construction to the maximum extent possible.

from sara denzler to everyone: 6:14 PM

II second Dale's comment.

from L Merritt MD to everyone: 6:14 PM

80 | Why the delay in the Piezometer network installation? Why not do as all the construction is being done??

from Diana Douglas to everyone: 6:14 PM

81 | I want to know what public outreach is happening to notify residents about the project and public comment opportunities. I live right in the 3B area and most of us are just now hearing about it and have seen no outreach efforts.

from Daniel Airola to everyone: 6:14 PM

82 | How can construction begin in area 3b before the date at which you said the document would be certified?

from Jaime to everyone: 6:14 PM

83 | Who is signing off on these projects?

from Joshua Thomas to everyone: 6:15 PM

84 | "one hour to discuss 8 different projects! We need public outreach for each project, and at LEAST 45 days for public comment. " 45 more days. You also released this over the holiday period. Why are we expected to review this over the holidays when federal employees get those days off?

from Eliza J. Morris to everyone: 6:15 PM

85 | I agree!! There should have been one of these meetings for each project.

from Michelle Stevens to everyone: 6:15 PM

86 | To support Dale Steeles comments, we did see displacement of birds to Bushy Lake since river riparian was eliminated. Birds and wildlife need refuge and connected habitat corridors.

from Kelly Cohen to everyone: 6:15 PM

87 | With the holidays basically taking the first two weeks of the comment period, and the vast amount of project work and impacts involved, adding 30-days to the current deadline would not be an unreasonable request.

Please consider a March 5 close of the comment period. Thank you.

from Mikkell Herholdt Jensen to everyone: 6:15 PM

88 | I saw little to no discussion on the medium- and long-term plan about vegetation and wildlife impact. The prior project slides were for a very different project. What will be done to protect existing wildlife and vegetation? What will be done to ensure that harmful invasive species don't overtake the newly destroyed space? So much detail is missing

from William Avery to everyone: 6:15 PM

89 | I didn't see detailed explanations about what the projects would look like.

from Annette to everyone: 6:15 PM

90 | This presentation was inadequate to quick with too small maps. Too many maps on a page. More time needed 60 days and in person presentations.

from Dale Steele to everyone: 6:15 PM

91 | The full impact of recent and ongoing levee construction projects in the parkway should be monitored and analyzed for unanticipated impacts before any additional work is initiated.

from Robin Truitt to everyone: 6:15 PM

92 | EPA received a request to extend the NEPA public comment period given all the design refinements, complexity of new projects, and fact that comment period includes 3 national holidays.

from Umar H to everyone: 6:16 PM

cut out at 17 mins

from Joshua Thomas to everyone: 6:16 PM

93 | Hard to find the right slide when you have 8 different projects in one presentation

from Brenda Gustin to everyone: 6:17 PM

94 | Great question, Bill: "For Contract 3B south RM 10.5 at Larchmont Park, the 2017 Lower American River Streambank Monitoring Report prepared for the American River Flood Control District found that erosion at this site does not threaten the levee due to the width of the berm. Why then is launchable rock needed that will destroy a dozen heritage oaks?"

from Jim Morgan to everyone: 6:17 PM

95 | The impacts slide of C 3B went by without an narrative

from JGabele to everyone: 6:17 PM

audio lost again

from Brenda Gustin to everyone: 6:17 PM

96 | Agreed: "rip rap is NOT normal/soil rich riparian habitat"

from John to everyone: 6:18 PM

97 | Where are the CGI pictures of before and after. Any civilian project would have them?

from Sherri Sandberg to everyone: 6:18 PM

98 | This feels like checking a box and not really explaining why such destructive means are needed and how your mitigation proposals address the major problems created for wildlife.

from Dave to everyone: 6:18 PM

99 | Forty five days is not nearly enough time for a technical team to evaluate this extremely complex project, let alone the public.

from John to everyone: 6:18 PM

100 | We really are going to need an extensions on the comment period

from Brenda Gustin to everyone: 6:18 PM

Yes! Please answer this question: "from Mikkell Herholdt Jensen to everyone: 6:00 PM

101 | I suspect it's because the intent is to accommodate a larger flow? Essentially turn the river into more of a canal? Can you please address this?"

from Daniel Airola to everyone: 6:18 PM

102 | It is very unclear what is actually going to happen in area 3b. What does "Construction Buffer actually mean?

from Chris Enright to everyone: 6:19 PM

103 | The piezometer network is apparently the primary monitoring tool for assessing project performance. As such it needs much more explanation as to its effectiveness. Please provide peer reviewed citations showing the veracity of this monitoring method for assessing stream bank erosion projects.

from Jim Morgan to everyone: 6:19 PM

104 | NO!! did not have narrative on C3B impacts slide

from Mark Berry to everyone: 6:19 PM

105 | Each one of these projects would more appropriately have a separate presentation. There are multiple projects here and often on the same slide. There is not enough time to evaluate the depth of this information especially as it was released right before the holidays. In addition most of the public works. Consider this falls short of stated objectives of meaningful public review and comment.

from Daniel Airola to everyone: 6:20 PM

106 | A "construction buffer" from what? We have access, staging, and buffer, but no actual construction area shown

from Annette to everyone: 6:20 PM

107 | Agree with Mark Berry. This was a very difficult presentation to follow.

from Keleigh Duey to everyone: 6:20 PM

As a reminder - the PPT and this recording will be available on sacleveeupgrades.com for additional review.

from Brenda Gustin to everyone: 6:20 PM

108 | Great question: "Please clarify if mitigation site by discovery park is what you are proposing for Contract 3B destruction"

from Annette to everyone: 6:21 PM

109 | But the maps are too small.

from Nathan Davis to everyone: 6:21 PM

110 | Does the "construction buffer" area include removing the trees in these areas? The slide is tough to decipher.

from Eliza J. Morris to everyone: 6:21 PM

I think we are back to parts that have been heard.

from Alan Dowling to everyone: 6:21 PM

heard this already...

from Joshua Thomas to everyone: 6:21 PM

111 | Your own geotechnical report, on page 16, stated that "no seepage and stability deficiencies exist" and recommended "no further improvements"

from Michelle Stevens to everyone: 6:21 PM

112 | Can the Corps and DWR do a public walk and talk so we can actually look at these areas in the field, understand the project, and add our expertise and ideas to minimizing impact?

from Andrea Willey, MD (privately): 6:21 PM

Please clarify the slide info

from Brenda Gustin to everyone: 6:21 PM

113 | Agree with Professor, Michelle Stevens: "Plants, esp trees and shrubs, will not re-establish within one year or growing season"

from Ellen Ganz to everyone: 6:21 PM

114 | Will there be giant rocks put in by the river? Is that what they are saying? Children play there! It is a beautiful area that I purchased in this area to access.

from Mikkel Herholdt Jensen to everyone: 6:22 PM

exactly

from Joshua Thomas to everyone: 6:22 PM

115 | Your own geotechnical report, on page 16, stated that "no seepage and stability deficiencies exist" and recommended "no further improvements" for the area of contract 3b

from Diana Douglas to everyone: 6:22 PM

116 | What is the actual planned construction at 3B? I have only seen shared here info on the construction buffer and staging, but what are the specific of the construction?

from Carey Knecht to everyone: 6:22 PM

117 | I would like to know more about the impact to public access. At a time when cities are funding cooling centers with tax dollars and temperatures are hitting record highs, including in the months before and after public pools are open, what health impacts will occur if the people who come here to swim / fish / etc. do not have access to a shaded, enjoyable riverfront, both during construction and given the post-construction conditions?

from Andrea Willey, MD (privately): 6:22 PM

no- much clarification is needed

from Dale Steele to everyone: 6:22 PM

118 | The cumulative impacts of these linked projects are not adequately assessed. The newly proposed projects add to impacts that have recently occurred and are still underway. Mitigation as proposed and implemented is not adequate for the many impacts including the loss of mature riparian habitat for years while these projects are underway and mitigation has not been adequately established.

from Karen Zamd to everyone: 6:22 PM

I'd like to hear from Joshua Thomas

from Joe O'Connor to everyone: 6:22 PM

119 | On the American River in the Contract 3B area, how many soil borings were taken up river from Howe Ave. and how many up river from Watt Ave. to determine soil strata? What were the results regarding expected erosion of the layers? What type layers are levees built on?

from JGabele to everyone: 6:22 PM

how do we ask question - do you need us to raise hand in webex

from Dan Kopp to everyone: 6:23 PM

120 | I know from working on the 2A and 2B sites as a biologist between Campus Commons golf course and Howe Ave., there were many nesting bird issues as the project started in May (height of nesting season in Sacramento) that were basically plowed over due to contractor-cowboy attitudes. How are nesting birds going to be better protected from the contractor's actions?

from Nancy Kniskern to everyone: 6:23 PM

121 | it sounds like we have erosion, and need rocks, and more rocks and more rocks and release of rocks. Doesn't anyone know the incredible power of vegetation and trees with roots that hold

122 | soil in place for eons. how may rocks are you bringing in, when our trees are doing a great job?
Where are the spots of unrelenting erosion taking place?

from Eliza J. Morris to everyone: 6:23 PM

I raised my hand, but am unsure of how the comment portion will work.

from Alan Dowling to everyone: 6:23 PM

Bill B has his hand up, need to be able to unmute people

from Brenda Gustin to everyone: 6:23 PM

123 | Yes. Please answer Sarah: "Please explain to the public what it means that these ARMS Alternatives were advanced only under CEQA and dismissed under NEPA. "

from Sarah Norris to everyone: 6:23 PM

Again, please clarify what it means that the ARMS Alternatives were dismissed under NEPA and advanced under CEQA. Unless people are practitioners this is very confusing to the public.

from Bruce Gervais to everyone: 6:23 PM

I second Nancy's comment: vegetation = erosion control

from Bailey Hunter to everyone: 6:23 PM

Yes, if you would like to speak, you can raise your hand. We will call on you and unmute you to speak.

from Brenda Gustin to everyone: 6:24 PM

124 | Please answer: "So what are the impacts to cultural resources and what is the plan to honor and preserve them?"

from Christine Norman to everyone: 6:25 PM

150 people at 2 minutes is 5 hours!

from Brenda Gustin to everyone: 6:25 PM

How do you answer Bruce's comment: "from Bruce Gervais to everyone: 6:11 PM

125 | The north bank at Sac State is going to be extremely hot and barren this summer. It is a lunar landscape. All of the work they are doing is absolutely butchering the river's beauty and life. They are literally destroying our river."

from L Merritt MD to everyone: 6:25 PM

she should get to 6.28

from Jay Domeny to everyone: 6:25 PM

z?

from JGabele to everyone: 6:25 PM

why are the project leads not here on call to answer questions

from Naomi E to everyone: 6:25 PM

yes 627/628

from Brenda Gustin to everyone: 6:25 PM

Ditto: "Joshua Thomas to everyone: 6:11 PM

126

You spent like 2 seconds on contract 3b south, where you are going to bulldoze 522 trees as well as potentially several 200+ year old heritage oak trees. Such devastation requires much more thorough explanation and discussion with the public. We should have public meetings for each subcomponent of the December 2023 SEIS/SEIR"

from Dale Steele to everyone: 6:26 PM

Chat input should be addressed as public comment under the conditions we are provided.

from Mikkel Herholdt Jensen to everyone: 6:26 PM

127

Again, it seems to me that prior reports state that additional work/improvements is not needed, but now all this destructive work is being proposed. Why? I think you mentioned it's to accommodate larger outflows from Folsom? Is this about erosion control under the current conditions, or is the real interest really to turn the river into a canal with greater flow?

from Dan Kopp to everyone: 6:27 PM

128

Nordic was the contractor for the project portion between the golf course and Howe Ave. and I was told by the preceding biologist (who left because of this) the Nordic personnel didn't honor nesting songbird buffers, only hawks.

from Brenda Gustin to everyone: 6:27 PM

Agreed: " Nancy MacKenzie to everyone: 6:12 PM

129

need to extend public comment period since it fell during the holidays and therefore hasn't provided enough time to review this complex document and prepare comments."

from Jaime to everyone: 6:28 PM

I live in an HO

from Andrea Willey, MD (privately): 6:29 PM

i think i was skipped

from Jaime to everyone: 6:29 PM

130

I live in an HOA, the condos along the levy. Has the HOA been informed of this project and possible damage due to construction?

from Peter J Connelly to everyone: 6:29 PM

you skipped Mr. Connelly

from Brenda Gustin to everyone: 6:29 PM

Is Professor Stevens' concerns about the turtles being addressed?

from Brenda Gustin to everyone: 6:30 PM

Agree with Dale Steele's comment at 6:14 pm.

from Dan Kopp to everyone: 6:30 PM

I started on the 2B project section between the golf course and Howe Ave. on 8/28/2023, just at the end of the nesting bird season, so I didn't experience any of the issues with nesting birds from Nordic, I was told about them (to be clear).

from sara denzler to everyone: 6:30 PM

Very concerned about the cumulative impacts of all the work on the American River. The displacement of species caused by the downstream work increases the importance of existing habitat which would be removed during this phase.

from L Merritt MD to everyone: 6:30 PM

Naomi only had 2 minutes, her 1st minute used up with announcements, she also raised concerns that 2 years later no grass was regrowing, sand was washing away that previously did not prior to the interventions and concern that removing trees further destabilized and is worsening erosion and whether this project is actually going to help protect us more or leave us more vulnerable and should this approach continue without further assessment?

from William Avery to everyone: 6:31 PM

Loss of vegetative armoring and unmitigated loss of heritage oaks and habitat

Contract 3B proposes clearing river banks of vegetation and trees, including heritage oaks and other valuable tree species of heritage size (black walnuts, cottonwoods, Oregon ash, and white alder) on the south side of the river from Watt Ave to Larchmont Park. This is an area with well established, self renewing vegetative armoring provided by the existing root network and relatively impervious to erosion at flow velocities less than 8 ft per sec expected in a 160,000 cfs, or 200 year flood event. More advanced flow models that take into account vegetation and trees suggest the actual bankside flows at 160,000 cfs may be even lower. These models need to be considered by USACE in their analysis. Table 4-4 in the GRR Erosion Appendix suggest that vegetation such as class A turf grass can withstand flows up to 8 ft per second. Rood et al. 2014 found that mature riparian trees are even superior to grass and t

from William Avery to everyone: 6:31 PM

hat “We recommend that riparian forests should be conserved to provide bank stability and to maintain an equilibrium of river and floodplain dynamics.” Further C3B proposes to dig trenches filled with rocks, lay in revetment on the cleared banks and cover this treatment with soil to create planting benches. For the 2 years of construction and 2 to 5 years post-construction it takes for significant vegetation growth and any form of vegetative armoring to occur these soils will be vulnerable to erosion at flow velocities as low as 2 to 4 ft per sec (Table 4-4, GRR Appendix Erosion Attachment E). So soil erosion risk increases significantly during this 4 to 7 year time period.

Further native riparian woodland habitat is not likely to reestablish itself when grown over a layer of riprap revetment. This is evidenced by the poor quality growth of vegetation limited to mostly coyote brush, willow, and the exotic Chinese tallow seen on experimental 2011 riprap revetments on the south side

from William Avery to everyone: 6:31 PM

of the river in the SARA park area.

Any heritage oaks or other heritage sized tree species such as walnuts, cottonwoods, Oregon ash, and white alder are unlikely to return if planted over riprap especially since the warmer average yearly temperatures due to our changing climate further reduce the probability of recruitment and long term recovery of these trees.

Though there are mitigation sites proposed they are distantly located, high maintenance sites and in most cases not in view from the river. When visiting The proposed mitigation sites one is struck by the number of dying trees particularly the more riparian dependent trees such as Oregon Ash, and also the lack of White Alder. This suggests that the loss of local riparian woodland habitat is not being mitigated at all.

In summary what contract 3B proposes is destroying the erosion protection of vegetative armoring and the unmitigatable loss of heritage oaks and valuable riparian forest for an erosionally vulnerable soil layer

from William Avery to everyone: 6:31 PM

er on top of an arguably somewhat protective layer of riprap in an area where their own analysis suggests that it isn't even necessary.

For these reasons we ask that the south bank erosion protection projects upstream of the Watt Avenue Bridge especially in the Fair Oaks Formation clay banks protected zones of SARA Park river miles 9 - 11 be removed from Contract 3B. If critical spots are identified where erosion repair is required we ask that a surgical approach be applied working in from rivers edge using habitat preserving biotechnical engineering.

- []

from Dan Kopp to everyone: 6:31 PM

Bill Brattain make 25 years-worth of sense; Bailey?

from Brenda Gustin to everyone: 6:31 PM

136

My friend who lives in one of the areas where construction will be taking place just received a postcard about this two days ago. That is not enough notice. What are the legal parameters required by USACE and DWR to inform the public?

from Ellen Ganz to everyone: 6:32 PM

Thank you Bill Brattain - I agree with everything

from L Merritt MD to everyone: 6:32 PM

Bill Brattain, concerned that the borders have low flows and can they re examine the prior reports ?

from Nathan Davis to everyone: 6:32 PM

Thank you Bill!

from Amy DavisCourt to everyone: 6:32 PM

Thanks Bill!

from Jay Domeny to everyone: 6:32 PM

137

very concerned about the clear cutting without cause contract3b. mitigation doesn't warrant destruction.

from Annette to everyone: 6:33 PM

138

List to Bill, an experienced person. With a wide levee we can preserve this ancient oaks.

from Christine Norman to everyone: 6:33 PM

139

Please explain to us why any heritage oaks in the 3b area need to be removed?

from Brenda Gustin to everyone: 6:33 PM

140

Will you send this slide deck to everyone who signed onto this call?

from Gerald Djuth to everyone: 6:35 PM

141

This presentation is devoid of details regarding the 3B project between Watt and Mayhew. Exactly how much destruction of trees will occur? Have other alternatives been considered?

from E Sunahara to everyone: 6:35 PM

142

Would like more information on 1. The impacts to residents whose houses back up the levee 2. Plan to protect trails, beach access, and as much vegetation as possible. 3. Restore Larchmont park after use and also will kids have access to the park play structure during construction. 4.

143

Concerned about my home value/economic impact if the beautiful nature area (3b) is reduced the

144 a waterway canal. 5. Is the asbestos in the rock that will be moved, air quality impacts to the neighborhood due to construction especially for sensitive groups... will there be advance notice of activities for noise and air issues?

from Jenn to everyone: 6:36 PM

145 2-3 years is not a very short term disruption of use of the American River Parkway. We use the levee near Larchmont Park several times a week year round. Removal of the trees will make the walks less enjoyable. The construction process sounds like a nightmare for those of us living near the zones. I am concerned about the short and long term effects on wildlife and humans.

from Dan Kopp to everyone: 6:36 PM

146 How does including the impacts to wildlife actually protect wildlife?

from Sandra Sanders to everyone: 6:36 PM

147 I would like to see a more targeted approach to the 3B bank erosion project that is less invasive and does not include the removal of our 100 and 200 year old heritage oaks and other trees. I have lived near this stretch of this river for almost 60 years and I do not want to see the riparian habit destroyed that I enjoy using daily.

from Jaime to everyone: 6:36 PM

148 But how is the impact considered ok? Just because it's documented, doesn't make it ok.

from L Merritt MD to everyone: 6:36 PM

Thank you for this comprehensive presentation and all the hard work being done to strengthen our levee system by reducing erosion, seepage and protection from over topping. This is a huge, important project, similar to precise planning of a complex surgery, pre -op planning, lab and imaging testing is so important, and we appreciate finally having this information session regarding the possible fate of our well established and well connected community and surrounding ecosystem that I have enjoyed for 35 years. I would like to know where in the SEIR can we find responses to the issues raised in the prior Peer Review report?, in addition to concern about noise, increased compromise of air quality with dust, toxic emissions and heat island effect, there appears to be a 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% percent

from Dale Steele to everyone: 6:37 PM

151 Using the recently proposed for listing NW pond turtle as an example, we need to know explicitly how this species has faired from recent and ongoing construction before additional projects are initiated. This should also be done for other sensitive species known in the Parkway.

from L Merritt MD to everyone: 6:37 PM

152 I reviewed all those tables, thank you, do still wish to know the results of the Peer review resport.

from Andrea Willey, MD (privately): 6:37 PM

Please let me know that you will come back to me as I think I was skipped.

from Dan Kopp to everyone: 6:38 PM

153 | Nesting songbirds are valuable too; not just hawks ACOE.

from Bill Brattain to everyone: 6:38 PM

154 | The erosion monitoring report I referenced is the 2017 Lower American River Streambank Erosion Monitoring Report, dated May 2018. It was prepared by MBK Engineers for the American River Flood Control District and the Sacramento Area Flood Control Agency. The Army Corps should have reviewed the findings of this report prepared after the 2017 high river flow event. It found the erosion at RM 10.5 South is not threatening the levee due to the width of the berm. The trees are helping prevent erosion here so removing them will make erosion worse and launchable rock will not stop it.

from L Merritt MD to everyone: 6:38 PM

155 | Eliza Morris raises concern of many of us for what is the plan and impact upon bike commuters?

from Mikkell Herholdt Jensen to everyone: 6:38 PM

yes - NOT recreational

from maryann to everyone: 6:38 PM

156 | how do we make the pictures of project large enough to view on our screens..iAlso will the American river look the same as your work by Guy bridge? It looks horrible I hate how industrial it looks....It is overkill and does not give me any confidence control erosion. I

from Mikkell Herholdt Jensen to everyone: 6:38 PM

(or not just, I should say)

from E Sunahara to everyone: 6:38 PM

157 | To add to Eliza's comment. We have lots of college students in the neighborhood who use the levee to ride their bike to school.

from Brenda Gustin to everyone: 6:39 PM

Thank you Keleigh: "from Keleigh Duey to everyone: 6:20 PM

As a reminder - the PPT and this recording will be available on sacleveeupgrades.com for additional review."

from Eliza J. Morris to everyone: 6:39 PM

Yes! Many are not here... but I get passed by MANY of them as I bike in to work.

from erik gabele to everyone: 6:39 PM

158

Is it anticipated that every bit of vegetation within the construction buffers shown will be removed? Also, how much of Contract 3b will be within the river channel at ordinary high water mark? Very difficult to see the impacts with the graphics provided.

from Brenda Gustin to everyone: 6:40 PM

Great suggestion, Michelle: "from Michelle Stevens to everyone: 6:21 PM

159

Can the Corps and DWR do a public walk and talk so we can actually look at these areas in the field, understand the project, and add our expertise and ideas to minimizing impact?"

from Jodie Ross-Doris to everyone: 6:40 PM

160

I want to echo others in calling for an extension on public comments. There are too many projects being presented together. They each need their own presentations and comment periods.

from Mikkel Herholdt Jensen to everyone: 6:41 PM

fully agree Gerald, my thoughts exactly

from George Kimmerelin to everyone: 6:41 PM

Gerald speaks the truth.

from Sandra Sanders to everyone: 6:41 PM

I agree with Gerald also.

from maryann to everyone: 6:42 PM

161

Why can't we wait and see if the project down river of guy bridge really does what the corp. says it will do. I think it is a canal and destroying the riparian corridor is an end game for vegetative and animal diversity. I agree with Gerald Djuth.

from Dan Kopp to everyone: 6:42 PM

Listen to Gerald Djuth (no launchable toe in 3B) and Bill Brattain Bailey/ACOE; local professionals who likely know the project area better than the ACOE.

from Geoff Benn to everyone: 6:42 PM

162

I also agree that the comment period should be extended and the projects separated. The Parkway is too important of a resource for the process to be rushed

from Amy DavisCourt to everyone: 6:42 PM

Thank you Gerald!

from Annette to everyone: 6:42 PM

163

I second Gerald Djuth's knowledge as engineer that this project is overkill.

from Christine Norman to everyone: 6:43 PM

164

Have they even walked the trails? Spent anytime actually among the trees, birds and animals in the area? It feels like there should be a way to save our heavily vegetated 3B area.

from Michelle Stevens to everyone: 6:43 PM

I know some of the professionals working for the Corps and yes as individuals many of them do walk the trails and love the plants and wildlife as well. Lets all be kind?

from Dan Kopp to everyone: 6:44 PM

They were being kind; what was unkind?

from Peter J Connelly to everyone: 6:44 PM

Everyone please submit a comment letter; you all have very relevant comments and need your comments need to be heard and put on record

from Mikkell Herholdt Jensen to everyone: 6:44 PM

is the chat not counting as on record?

from Jaime to everyone: 6:44 PM

Thank you Mr Fishman!

from J. Paul Bruton to everyone: 6:45 PM

yes - the chat is official record

from Christine Norman to everyone: 6:45 PM

Thanks Greg Fishman

from Susan Solarz to everyone: 6:45 PM

Great comment, Gregg!

from Jaime to everyone: 6:45 PM

Sorry, it does not feel like there is any balance when it's all being ripped away.

from Amy DavisCourt to everyone: 6:45 PM

165

yes, please. Seperate meetings for each site would be warranted.

from Christine Norman to everyone: 6:46 PM

166

Another 3b meeting would be very much appreciated.

from maryann to everyone: 6:47 PM

167

i agree with Greg Fishman. This is too much and want to see other example of the corps. work....I know they have made engineering mistakes in the past so I don't want this project to go forward.

from Alan Dowling to everyone: 6:47 PM

3B:

168 | Schedule stated summer; What are the proposed dates / number of weeks / months so we know base planned 'durations' incase there's delays? There's only a few months to go...so very late to have this current vague schedule information (starts in summer..etc.). Is there a P6 schedule per contract?

169 | Construction Carbon accounting report - please provide?

In regards to local residential roads, staging areas, works adjacent to houses etc. :

170 | - Please note that residents request / require detailed geotechnical analysis (not a general one as currently provided), OSHA standard safety mitigations and risk assessment plans... not just for the site itself but a qualitative risk assessment (QRA) pertaining to air/noise/safety/risk for the residential properties mere FEET from proposed 3B construction 'shaded areas' past WATT Avenue - Larchmont. As a cancer survivor, my wife suffers from respiratory issues -We are very concerned about these plans over such a long schedule.

from L Merritt MD to everyone: 6:47 PM

Gregg Fishman notes that there have been precedents in other areas where people re thought things and created a central channel, better than a 1 size fits all plan for all stretches of the river.

from Annette to everyone: 6:47 PM

171 | Another meeting regarding all the 3 American River segments, not just 3B. Northside of River
172 | from Howe to Watt is also a straight and has less hazards with a tremendous riparian area full of birds and other animals.

from Jenn to everyone: 6:47 PM

Thank you to all the people making comments who are making excellent points very eloquently. I hope the Army Corps will take the time to achieve the goals without so much destruction

from Ellen Ganz to everyone: 6:47 PM

173 | I would appreciate another 3b meeting

from Brenda Gustin to everyone: 6:47 PM

174 | I would like to hear more about the project Gregg Fishman described that was created in Napa. Agreed: this is a different project, and I agree that more creative ways to support all life along and within this Wild and Scenic River. I know you think you've put together a great plan, however, there are several professionals in this community who have ideas that need

175 | consideration. The public doesn't always need government protection. The public needs to be involved with the government employees whom we employ.

from Alan Dowling to everyone: 6:47 PM

176 | Part two message: Some works/staging appears to be planned mere feet from houses / backyards (EG: Manlove pump station) where families and children recreate on their own properties. This will risk impacts to foundations (pools etc. due to vibrations.), wildlife and personal health due to air quality, dust etc.

Please send us details on how each staging area is planned to be used under contract 3B. Hours of working? What will be parked there equipment wise? Any material storage etc.? Where will the trailers be located etc.? Are there any site/excavation works planned for Man Love staging area?

from Gerald Djuth to everyone: 6:48 PM

177 | USACE needs to develop an alternative that enhances the protection provided by the established riparian habitat, not destroy it. The launchable trench and launchable toe proposal is poorly thought out, there are other methods that can protect this stretch of the river and protect the vegetation, not remove it.

from L Merritt MD to everyone: 6:48 PM

178 | Another neighbor David notes 3 decades living by the river with no observable erosion, deeply enjoyed by the members of the community and request to try and leave it untouched.

from Jodie Ross-Doris to everyone: 6:48 PM

179 | Thank you Keleigh! Balance is the key! Sadly, it does not look like that was achieved by Sac State. Please consider extending the public comment period for 3b as well as additional meetings.

from Joshua Thomas to everyone: 6:48 PM

180 | The Corps does not appear to attempt to justify many of the rock toes and rock trenches for contract 3b, especially around the claybanks in Project 3b South and in front of Larchmont Community Park. The only documents the SEIS/SEIR really reference for justification is the Geotechnical Report and the Erosion Protection Analysis from the 2016 General Reevaluation Report. The Geotechnical Report found that "no seepage and stability deficiencies exist and so recommended "no further improvements" on page 16. The Erosion Protection Analysis recommended more borehole samples be taken because of a high degree of variability in bed materials. The Corps did not collect more samples and in fact the closest boring it took was at Howe, nowhere near the area between the Mayhew Drain and Watt Avenue. Why didn't the Corps follow the recommendations of its panel of experts to take more borehole samples?

from Gerald Djuth to everyone: 6:49 PM

181 | I agree Daniel. It appears that USACE is trying to minimize public input.

from JGabele to everyone: 6:49 PM

182 | Absolutely extension is needed and in person meetings with public with Project leads, engineers,
who can answer questions

from Jay Domeny to everyone: 6:49 PM

I concur

from Joshua Thomas to everyone: 6:50 PM

183 | The SEIS/SEIR should have a tree inventory map that shows all the trees which will be cut down
and where the construction ramps will be placed.

from Ellen to everyone: 6:50 PM

Great comments, Dan. Thank you!

from JGabele to everyone: 6:50 PM

184 | Agree - we need a exact tree inventory

from L Merritt MD to everyone: 6:50 PM

185 | Daniel Airola has 10 pg of comments prev submitted, a wildlife biologist of 40 years experience,
an extension is needed, the decision to release this document creates the appearance that you do
not want public input. If you do, please demonstrate that by giving a project of this complexity
more time to review it. There remains lack of clarity, what is a construction buffer? No

186 | construction sites identified on the documents, hard to make comments upon a project not
presented in an understandable fashion, so it is critical to have another more focused meeting.

187 | The mitigation measures are minimal and insufficient in addressing impacts on wintering water
birds that use that area as a roost site and numerous additional issues.

from maryann to everyone: 6:51 PM

great commemts dan.

from Brenda Gustin to everyone: 6:51 PM

188 | I request the chat notes be shared with all participants on the call. Thank you.

from Jay Domeny to everyone: 6:51 PM

thanks Gerald D

from L Merritt MD to everyone: 6:52 PM

189 | Pelle with the CItY of Sacramento Page 3-7 all alternatives, interested in ?? whole raps, on page
3-12, speaks of "only what has changed from the 2016 document" is discussed, with the hall
routes? Need to look at both documents 2016 and revision??

from Jay Domeny to everyone: 6:52 PM

thanks Bill B

from M B Schwehr to everyone: 6:52 PM

190 | I agree with Bill Brattain, Bill Avery, Josh Thomas, Gregg Fishman, and Gerald Djuth comments. Request in person meeting with project leads, engineers, decision makers.

from sara denzler to everyone: 6:53 PM

I second MB Schwehr's comment.

from Nancy MacKenzie to everyone: 6:54 PM

191 | A previous comment makes a good point. Since this is a supplemental document, we'll have to go back to the 2016 document and review the SEIR/EIS alongside the 2016 document -- further emphasizes the need for more public review time. Thank you.

from Dan Kopp to everyone: 6:55 PM

Pete v ACOE!

from Christine Norman to everyone: 6:56 PM

Thanks Pete!

from sara denzler to everyone: 6:56 PM

I second Pete's comments.

from Annette to everyone: 6:56 PM

192 | I request a copy of all the chat notes for all participants. Thank you.

from Jaime to everyone: 6:56 PM

Great job Pete!

from Mark Berry to everyone: 6:56 PM

193 | The high level birds eye view maps are nice but unfortunately insufficient, especially due to the short time for public comments. There is a lack of specifics. What the public wants to know and have the ACOE show us is what presently exists, what are you proposing to remove and why?
194 | How long will the restoration to existing conditions take? What happens to the fish and wildlife species including those on special status lists while they wait years for restoration regrowth. The last prior ACOE project (Common Features) obliterated existing habitat and large trees. Vital habitat for ARP that will take decades for regrowth. Today's presentation of the multiple proposed projects is conclusionary. The public presentation does not show us the specifics why this is being done as proposed?

from L Merritt MD to everyone: 6:57 PM

195 | Pete, another engineer, notes that C3B will not add another oz of protection, that it will destroy the original clay banks. In the coming days you will receive details, including slow velocities, go back to the models, come up with a targeted data driven control plan that does not obliterate our

environment, it is about preserving the crown jewel of Sacramento to provide protection without devastation, the other projects, Folsom, etc were necessary, this 3CB is a bad idea.

from Joshua Thomas to everyone: 6:58 PM

196 Children are extremely vulnerable to air pollution. Has the Corps considered that using Larchmont Community Park will result in huge amounts of diesel exhaust and particulate matter being put into the air for 9 hours a day, 6 days week over the course of two years near O.W. Erlewine Elementary School?

from Alan Dowling to everyone: 7:00 PM

Great point Joshua, same concerns here for my family

from David B to everyone: 7:00 PM

197 To summarize my comments. Over 30 years we've not seen any erosion and really would not like our park, trails and the beauty of our river disrupted for a threat that doesn't even appear to be real. If I can't get project 3B stopped I might be OK with a plan that went in with a light touch, no big tractors, no big launch pads and placed native rocks in strategic areas, left the river and flood risks decreased but also looked as though it had never been touched. Anything else is overkill, a waste of money and destruction of the natural ecosystem that has survived for billions of years.

from L Merritt MD to everyone: 7:00 PM

198 JG is very concerned and believes we need to extend the time period to allow the public and agencies to look at both the EIR, EIS and supplement versions, in looking at this, Contract 3B, have definite deep concerns in data that was linked to site selections, certain points only 2 of 25 recommended but do not appear to have lined up. The velocity discussions in original and subsequent information and see sourcing of old data brought into the rebranding of a new study. It is part of the concern of integrity, it seems to be a "1 size fits all" approach. The original was the entire ARP, the lifeblood of the greater region, an economic engine of \$364million/year, the salmon fishery info needs to be updated. 95% of the fish are in Watt ave and able, to do mitigation to 1 point at Discovey park, the entire parkway cannot shift there. Going too fast, going to cut down flora and fauna that the wildlife rely on, heat, water quality impact us all. We need 2 insure we are right, more surgical ap

from L Merritt MD to everyone: 7:01 PM

200 Please do an in person meeting, original source documents hard to see, pixillating

from Mikkel Herholdt Jensen to everyone: 7:01 PM

201 The Larchmont Park playground and tennis courts will be literally right up against the work and dump zone, and the whole park is widely used for recreational sports and children playing

from Mark Berry to everyone: 7:01 PM

202 Was the the ACOE required to get a CLOMR-F for any of these proosed projects? Does the ACOE have those permits?

from Christine Norman to everyone: 7:02 PM

203 If you have a meeting concerning the 3b area please have it locally in our neighborhood.

from Annette to everyone: 7:02 PM

And also 3a please.

from maryann to everyone: 7:02 PM

204 There is a school near Larchmont park- noise will also be neg. problem to kids learning...who will pay for floodingand other problems to homes if your mitigation solution ends up causing not just the destruction of the riparian corridor but also flood and errosion problems and heat related problemrs to the wildlife- we feel this is beeing pushed down our throats. Pace is very important,, I want the project slowed because of the on going issues of flucuating climate and stree that has put on wildlife and plants this is the wrong time!

from L Merritt MD to everyone: 7:03 PM

JT considering how massively destructive these rock toes are the corps does not appear to justify it around the clay banks and larchmonts the only documents the geotech analysis found that "in this area no seepage issues exist" on page 16, no action needed. For erosion, suggested more boring, more sampling, closest was at Howe, not near the watt where going to cut down 500 trees? 2 years pump diesel exhaust and particulate matter near an elementary school?

from Bill Brattain to everyone: 7:05 PM

205 The erosion at RM 10.5 for Contract 3B is moving extremely slowly and is barely noticeably different after major floods like 1986, 1997, and 2017. The width of the bank here is a couple of hundred feet and is densely vegetated. Removing the trees and vegetation and distributing the natural soil will virtually guarantee a massive amount of erosion during future flood events and the launchable rock at the base of the levee will not stop it. If it gets that far, and it will if the trees are removed, it's already too late.

from Tom K to everyone: 7:05 PM

206 There is an Elementary school adjacent to Larchmont Park - the parking lot has already had a gate installed - sthis in preparation to use the park as a construction worksite with trailers etc? Also many of the schools students have respiratory issues

from Brenda Gustin to everyone: 7:05 PM

I'd like to hear answers to Alan's question posted at 6:47pm.

from maryann to everyone: 7:05 PM

Go to watsonille, the levee there fails every year...

from Naomi E to everyone: 7:05 PM

can someone organize a legal response? I'll do all I can to alert our neighbors & all Sacramentans of this horrible plan & destruction & get their support for legal action

from Joshua Thomas to everyone: 7:06 PM

207

Safety over the environment is a false choice. Devegetating the slopes will increase the velocity of water along the banks, exacerbating erosion.

from L Merritt MD to everyone: 7:06 PM

208

Peter looking at the project description, seems the analysis relies on overgeneralized data. There is minimal justification for the project. There is not one instance of levee seepage upstream of Watt avenue, have lived there over 40 years. There have been some rain events with extensive water accumulation, and the levee held up well. This seems like a more targeted control down stream might be justified. Our neighborhood is not even in a flood zone, why try to instill fear saying we have to include safety over environment? They pumped a bunch of slurry possibly 100 t down the border of the levee to stabilizing it.

from E Sunahara to everyone: 7:06 PM

209

OW Erlewine Elementary borders Larchmont Park. Have they been notified of this work? May have impacts to the school.

from Joshua Thomas to everyone: 7:08 PM

210

What happens to the planting benches if the launchable rock trenches and toes launch?

from pete to everyone: 7:09 PM

211

As others have suggested, given the complexity of these projects, and the huge area they cover, especially Contracts 3B north and south, 4A and 4 B, can SAFCA, DWR and CVFPB have an in-person public meeting to inform more of the public and get all questions asked and answered? And extend the comment period by at least another 30 days.

from Peter J Connelly to everyone: 7:09 PM

Good job William...

from L Merritt MD to everyone: 7:09 PM

212

Bill Avery professional biologist, prof emeritus Sac State, Contract 3b proposes removing heritage oaks, white ash, alders area of well established self renewing vegetative habit able to tolerate 200 year flood event. The models suggest < flow . Table 4-4 in the general erosion appendix graphs can withstand up to 8 ft/second, mature riparian trees could better withstand than grasses. C3B proposes to build trenches, how will this treatment with soil with 2 years during construction and then 2 years post construction, so the risk goes up during this 4-7 year time period. For these reasons we ask that the south stream erosion be removed from contract 3

B, we ask a surgical approach working in from rivers edge, preserving habitat as much as possible.

from Christine Norman to everyone: 7:09 PM

Thanks Bill

from Mikkel Herholdt Jensen to everyone: 7:09 PM

thank you William

from Sandra Sanders to everyone: 7:10 PM

Well said and on point, Bill!

from Jay Domeny to everyone: 7:10 PM

thanks Bill

from Joshua Thomas to everyone: 7:11 PM

213 Why are so many sources cited in the erosion protection analysis and geotechnical report unavailable to the public? For example, The report from Ayres Associates, "Channel Stability Analysis of the Lower American River," is cited twice in the Erosion Protection Report, (p. 13 and 68) not inclusive of its listing in the References. Yet, at least as of January 7, 2024, this source is not available at the USACE Digital Library nor discoverable through a Google or Worldcat search. Likewise, the study by Ayres Associates called "Lower American River, Erosion Susceptibility Analysis for Infrequent Flood Events," is also cited twice in the Erosion Protection Analysis (p. 13 and 41) but is not available as of January 7, 2024 at the USACE Digital Library, nor is it discoverable through a Google or Worldcat search.

from Michelle Stevens to everyone: 7:13 PM

need to unmute me

from Jessica Wiseman to everyone: 7:14 PM

214 Larchmont Park, Manlove Water Station (area between Watt & Waterton) as well as the areas off American River Drive are all deemed "Staging areas". These areas back up to houses. What analysis has been done for ground pollution, structural/pool damage, and impact on children and residents with compromised health issues? In addition to air and noise pollution, can you please address these issues specifically for those of us with these staging areas literally in our backyard.

from L Merritt MD to everyone: 7:14 PM

215 NK I live 20 ft from the levee on Mayhew drain, I am worried about dust, vibration and wonder if there is any mitigation to help with that. I am concerned you are taking out old Oaks, the forest is full of complexity providing habitat for wildlife. They have cavity for barn owls, wood ducks, takes time for this habitat to development, if you remove the trees, you remove the wildlife. It is a heartbreak to me at this older age that I will not have access to this during the construction and

216

may not live to see it again once the work is done. She would like questions answered and feels sad that the questions posted from the previous meeting have not yet been answered. Sad that it has been hard to communicate/get answers and the cavalier attitude, should have an engineer and recorder on the call for us. Should be able to answer our questions now. Acknowledges that a lot of good work has been done and appreciated it.

from Gerald Djuth to everyone: 7:15 PM

217

The only erosion occurring at the 3B area near Larchmont park is at the toe of the riverbank, as documented by SAFCA monitoring. Any work that is done to prevent erosion should be focused at the toe, and implemented in such a way to prevent any disruption to the riparian vegetation. Sacramento River work is being done by barge; can that be done here? That would accomplish erosion protection and preserve the riparian corridor.

from L Merritt MD to everyone: 7:17 PM

218

MS Bushy lake, w pond turtle, and planting culturally sign plant species, emeritus professor. NW Pond turtles are threatened by US Fish and wildlife service. All who observe wildlife note we have a small population relative to non native turtles, when doing construction, the turtles were hibernating and sleeping, there should be windows to respect their nesting, going terrestrial/aquatic cycles and basking sites for them. Consider it as one ecosystem and the animals are already stressed and compressed, green and white sturgeon should also be listed in the section, working with ?barbare native grass, mugwort, indian hemp use culturally significant plants in the plant mix. Do a walk and talk together by the river, would do a good benefit for public relations and we could all benefit from each others knowledge.

from Joshua Thomas to everyone: 7:17 PM

219

The map showing staging areas and construction buffer zones and construction access zones is very confusing. If trucks will be using the path and levee between Mayhew Drain and the project site in front of Larchmont Community Park, will we be able to access the river trails from Larchmont Community Park during the two years of the project duration?

from Amy DavisCourt to everyone: 7:17 PM

220

These are great ideas Michelle - I agree about the walk & talk and native species

from L Merritt MD to everyone: 7:19 PM

221

JWisement-Larchmont park, water station and off ARD are all deemed staging area, what analysis has been done for pool, children, people with health issues, exposure to pollution, what is this impact on people. Supplemental comment to what was previously submitted. Thank you for offering the opportunity for this public forum, we need another public forum with complete transparency for our community

from Susan Mills to everyone: 7:19 PM

222

Please reconsider the projects, particularly 3B. Reevaluate the data and take a surgical approach to any erosion mitigation needed and leave the vegetation intact (a mitigation tactic to reduce

erosion). This is a wild and scenic river and with an upfront investment in strategic mitigation and work, there will be significant and appreciated payoff for all.

from Jay Domeny to everyone: 7:19 PM

223 | what's the January 16th meeting going to consist of?

from maryann to everyone: 7:21 PM

224 | great idea michelle, but I think the Corp. wants us to go away. But this is not enough...We feel rushed into acceptance. But why reshape this wild river into a canal?

from L Merritt MD to everyone: 7:21 PM

225 | Mikkel Jensen lives S of River, agrees with what has been stated, painful to think of what will happen to the treasure and natural wildlife, impact of pollution and other things raised locally. Have heard from many that vegetation is a form of erosion control and prior report saying no further action needed, when look at work at Sac State, not only is it unuseable, it is bare and vulnerable that is not was a resistant bank. Is the goal to reduce erosion or increase flow capacity of the rivr? Need more discussion on what is the goal? Accommodate the water flow?

from Bill Brattain to everyone: 7:22 PM

Great comments, Mikkel!

from Mikkel Herholdt Jensen to everyone: 7:22 PM

thank you to everyone coming out tonight - really appreciate everyone

from William Avery to everyone: 7:24 PM

I agree, Great comments, Mikkel!. I used to take students on ornithology and ecology and beginning biology field trips out there! No more.

from Joshua Thomas to everyone: 7:24 PM

226 | Not answering questions places a greater burden on the public in educating themselves on these projects. Instead of getting our questions answered all at once, we must each ask questions and wait for USACE to get back to us individually during a very brief review period considering the holiday release date and extraordinary complexity and scope of the SEIS.

from L Merritt MD to everyone: 7:24 PM

227 | Ellen Gance could there be someone here to answer questions at the next meeting? Appreciate people who have been her so long and have perspective, have question about smog and noise and what is said about the park, live 3 months down from the park. Has an 8 year old son, purchased to have access to this space, very devastating, what could be done to have this reconsidered to listen to these long term residents and engineers, we know these are not the areas that are prone to flooding.. It is not common sense that removing vegetation will strengthen the levee. Joins in

the conversation to have another meeting. We need to make sure it is built into the plans and protect us and nature as much as possible, children are also vulnerable.

from Ellen Ganz to everyone: 7:26 PM

228 | I am also having technical issues and would appreciate in person meeting.

from L Merritt MD to everyone: 7:26 PM

229 | The way the ARE has approached this 3B feels very dismissive, releasing over the holiday and then a web meeting and technical issues during this meeting, it could go a long way to help the ACE that our community want to be heard, we are reasonable people, we know how government works. Really, try to get our buy in somehow, don't just appease us with public comment period over xmas and new years. The walk along might go a long way with this project.

from Mikkell Herholdt Jensen to everyone: 7:26 PM

we lost you justin

from William Avery to everyone: 7:28 PM

230 | All social trails and beaches need to be carefully mapped and preserved.

from Bill Brattain to everyone: 7:28 PM

Great comments, Justin!

from L Merritt MD to everyone: 7:28 PM

231 | Justin Augustine works for center biological diversity, lives near Larchmont has a 4 and 7 year old children, love the river, swim there and feels like a magical place along the river, remote from an urban landscape, feels you are going back in time to a pristine place. The community is very concerned that if what happens to us, as per Sac State, hard to see how that is compatible with Wild and Scenic Act. Please reconsider.

from Mikkell Herholdt Jensen to everyone: 7:29 PM

it is indeed a pristine place - I grieve to think what it will look like under the current plan

from Jodie Ross-Doris to everyone: 7:29 PM

232 | Agree with a recent commenter- Public comment period starting right before Christmas speaks volumes. Not a good way to start things off with the neighborhood.

from Naomi E to everyone: 7:29 PM

also: walking, biking, running, sitting & relaxing

from Mark Berry to everyone: 7:30 PM

233

As part of the project records will the ACOE include the records of consultation made with USFWS, NMFS and California Department of Fish & Wildlife as part of the public record for these projects, especially Contract 3B?

from L Merritt MD to everyone: 7:30 PM

234

Carey Knecht Summer weekends is full of people, swimming, fishing, rafting, festive area, finding shade, record high temperatures, public cooling centers, even when their AC went out, used it to help stay cool. What are the public health impacts of a gravel parking lot effect. Bike groups and others enjoy it. Very surprised no posters up, no city wide announcement of the issue, meaningful interaction needed.

from Naomi E to everyone: 7:31 PM

anyone with legal connections?

from Ellen Ganz to everyone: 7:31 PM

235

Yes to summarize my comment I am asking what is the smog and noise expected? What can be done to reconsider given all the comments? Is the purpose for flood mitigation or to increase flow?

from Bill Brattain to everyone: 7:31 PM

Hundreds of dog walkers every day! Including me, every morning. Not sure if the trails will even still exist.

from Jeanne to everyone: 7:32 PM

236

Is there a way to get larger images, rather than images that have been sized to fit on a page?

from Brenda Gustin to everyone: 7:32 PM

237

I agree that it is important to share the intention brought up by Mikkel Herholdt Jensen. I hear this is for erosion control in anticipation of larger flows. Your concern of deep flooding in the future is not supported by evidence that this destruction will truly protect the neighborhoods from flooding. To me, this doesn't make sense based on the large amount of local professionals who disagree with this approach. The local people and wildlife who will live with these changes require time and further discussion. I agree that a walk and talk is necessary. On another practical level, it is necessary for the residents living in the areas immediately adjacent to the project really need to be shown what will happen to their environment. I've heard testimony that the project downriver did not prove to be successful. As a native Sacramentan, I wish to see local talent and professionals acknowledged and involved. I think your work can be enhanced by their expertise.

238

from Ellen Ganz (privately): 7:33 PM

239

Also - can someone be present to address these questions be present 1/16?

from Jeanne to everyone: 7:34 PM

240

I recall when we had lower levees in the high water in 1986. Even then it didn't overtop the levee. AND, when the levee was raised, we lost MANY heritage oaks. BRECA did out best to come up with a solution to reroute the levee, to no avail. I am East of Mayhew drain and have lived here since 1976

from Joshua Thomas to everyone: 7:34 PM

241

why is the outreach so meager and perfunctory on what is byfar the largest project so far proposed under the American River Common Features? This feels incredibly disrespectful. We need more outreach and a longer comment period.

from L Merritt MD to everyone: 7:34 PM

242

Sarah Denzler Thank you for staying so long, these processes are hard on the staff (Why I am trying to help with transcription:) SHe lives up from Mayhew drain and a neighbor is retired prof Sac State with nesting birds up and downstream, another resource to consider. Worked Dept Water Resources, funding projects and funding valley projects, for the Corps. Add concern sectin 3B and whether the extreme measures are justified considering the past results, the incredible impact it will have on the parkway, cumulative impact, bird and wildlife species that have moved and compressed into remaining habit. Ca has already lost 95 % of its Riparian habitat and we must preserve what we can to avoid loss of species and also be considerate of water quality and we need not have 2 many projects into 1 big EIR, split it up to have different comments across different areas.

from Jay Domeny to everyone: 7:34 PM

thanks everybody. I'm out.

from Gerald Djuth to everyone: 7:34 PM

Thanks Sara, good comments.

from L Merritt MD to everyone: 7:37 PM

243

SSanders, Thank you for the extra time, speaking as a person who has lived here 60 years and aligns comments with Bill, Pete, Nancy and others more targeted approach, planning on retirement to enjoy this area, 3B stretch, urging for targeted approach, only what is necessary, SAFCA and others to look at it more, we can not undo what will be done. MOving the elderberry bushes will not replace these hundreds year old trees , wont help if I am 80 years old, that things are hoped to grow back, just ask to not be as invasive and do only what is necessary.

from Mikkel Herholdt Jensen to everyone: 7:37 PM

244

absolutely agree Sandra - if this plan moves ahead as outlined here, none of us will live long enough to see the recovery of the 3B stretch of the river to what it is today

from William Avery to everyone: 7:38 PM

Thanks Sandra

from Sherri Sandberg to everyone: 7:38 PM

245 | And so devastating for the wildlife that have so little spaces to go on top of the impacts of climate change.

from L Merritt MD to everyone: 7:39 PM

246 | MBerry Thank you for opportunity for public comment. Very imposing when arrive just before the holidays, one thing was a search, was there there consultation with US Wildlife services, Fish and Game and ? For contract 3 B and he has background efforts for ARP, works in construction management. Did not see depth of analysis you would expect for a salmon river wild and scenic habitat? Where are they in the reports.

from Carey Knecht to everyone: 7:41 PM

L Merritt thank you for your note-taking service!

from Joshua Thomas to everyone: 7:41 PM

247 | Whereas all previously proposed ARCF contracts received their own SEIS/SEIR or Supplemental Environmental Assessment/SEIR—including Reach D Contract 1, Sacramento River East Levee Contract 1, Sacramento River East Levee Contract 2, Sacramento River East Levee Contract 3, Sacramento River East Levee Contract 4, American River Contract 1, American River Contract 2, Sacramento River Erosion Contract 1, American River Contract 3A, and Sacramento River Contract 2—the vaguely named ARCF SEIS/SEIR, made open for public comment on December 22, 2023, breaks with that precedent and contains no less than six major projects, contracts, and subcontracts—including the Magpie Creek Project, American River Erosion Contract 3B North, American River Erosion Contract 3B South, American River Erosion Contract 4A, the American River Mitigation Site, and the Sacramento River Mitigation Site. Why were all of these projects, some containing several non-contiguous work sites, put together?

from JGabele to everyone: 7:42 PM

248 | Contract 3B Alternative 2 if built as per USACE documents will only achieve only 60% assurance of performance under 200-year flood event for residential areas for sites listed in contract 3B. Whereas it is 45 - 48% for those residential areas today. Downstream the assurances are higher in 90% and above. Can USACE please discuss more about performance assurances for specific areas you will construct in - so we understand protection levels of what we have now, vs what this project will provide specific to residential areas adjacent contract 3B sites

from Kelly Cohen to everyone: 7:42 PM

249 | Agree w Mr. Brattain re heritage trees. Why isn't the stabilizing effect of the heritage oak roots being seriously considered as an avoidance measure?

250 | In my opinion, off-site mitigation does not mitigate the project impacts left behind on-site that affect species, habitat & ecological processes.

Therefore, avoidance must be 1st priority by finding alternative methods to achieve erosion control (outside the box; there is an international community to shop in).

Cumulative impacts, time & again, are mentioned & brushed over. What is the baseline against which cumulative impacts are measured? What are the boundaries of the geographical area within which impacts may directly or indirectly contribute cumulatively?

251 The American River Parkway, both the terrestrial & aquatic, has been project-by-project degraded. This can no longer be sidestepped.

I do appreciate the importance of erosion control & bank protection, but without making a sincere effort searching far & wide for ingenious

from Kelly Cohen to everyone: 7:42 PM

alternative methods to achieve erosion control, the ACOE will continue to perpetuate the irreparable destruction the Parkway cannot afford.

252 It's said taking the same action leads to the same results; however, because of the cumulative nature of the impacts over time & the varying abilities of species & habitats to recover, taking that same action leads to additive cumulative impacts that go unanswered.

We need ACOE to begin a new era in how projects are designed & constructed.

from L Merritt MD to everyone: 7:43 PM

253 Mary Ann was in Santa Cruz, put in harbor with huge rocks, despite public outcry, they proceed and now they have to dredge area year, destroye sthe beach area. Had ACE visit her classroom, when they decided to do the river control, did incorrretly, had to remove, at extra cost and annually dredge. If we lose this rare riparian corridor, it is the children and everyone who lives hear. There have been major stressors, strore last year and Still trying to recover now, this is not a good time. Need a targeted approach.

from L Merritt MD to everyone: 7:43 PM

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.

254 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,

from L Merritt MD to everyone: 7:43 PM

255

Given the timing of release of notice of the amended report and comment period, with initial incorrect contact information and extensive documentation to review, we respectfully request more time to review, comment and obtain responses to the numerous questions and clarifications we are requesting.

from L Merritt MD to everyone: 7:43 PM

256

<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?

from L Merritt MD to everyone: 7:44 PM

257

How much money will all the work under Contract 3B cost?

What are the federal, state and local shares?

from sara denzler to everyone: 7:44 PM

Yes, please send a copy of the chat notes to all participants. Thanks.

from Joshua Thomas to everyone: 7:44 PM

258

How much does contract 3b cost?

from L Merritt MD to everyone: 7:44 PM

259

The flow model output results for the 160 kcfs simulation (Fig 4-5 of ARCF GRR, App C, Attachment E) is very zoomed out and difficult to interpret, and it appears the red levee symbology is possibly masking model output data showing lower velocity flow near the levee (ie dark blue hidden beneath the red levee lines). Is there a much more zoomed in, higher resolution map without levee symbology available to the public?

from Dan Kopp to everyone: 7:45 PM

When ACOE projects start in March - July, songbird nests seem to be of little importance.

from L Merritt MD to everyone: 7:45 PM

260

Why not submit our comments from tonight to the USACE team and request published written responses on your website?

from Michelle Stevens to everyone: 7:45 PM

Dan Kopp that is also turtle nesting season

from William Avery to everyone: 7:47 PM

261

The footprint figures for contract 4B are cited in the SEIR SEIS but completely missing I believe they are 3.5.2.1-11 and 3.5.2.1-12 it is impossible to evaluate or comment on them if they are missing.

from Carey Knecht to everyone: 7:47 PM

262

The fact that staff needs more time to answer the public outpouring of questions seems like a possible reason for a longer comment period.

from Sandra Sanders to everyone: 7:49 PM

Thank you, Beth. Great comments. I fully agree with your concerns.

from Ellen Ganz to everyone: 7:49 PM

Yes I asked for someone here to answer basic questions about what is expected- someone must be able to know more about this project than just taking notes?

from sara denzler to everyone: 7:50 PM

I second Beth's comments.

from L Merritt MD to everyone: 7:50 PM

263

MB on board, masters 35 years tech air pollution, risk assessment, disproportionate risk when exposed to toxics, K-6 Earlywine school and Californias diesel potency factors. Gets sustenance daily time on the river, astonishing amount of wildlife. Home is immediately adjacent and absolutely care about flood safety, will feel less safe if the renewable complex root network is to be replaced with rocks and sandy poor soil, linking them together which means more staging areas next to schools, if they ever launch, we will lose and have to replace them, 35 years have lived through # atmospheric rivers and the slurry walls going down ## feet, there is so much more improvement, there does not seem to be any further need, some have made good sense. It seems a raw deal to do miles of bulldozing than just doing a few spots. There is no compelling need. The Corps own data say seepage no problem. We do not have timed testing of the launchable rock toes. The 2011 revetment has not in any way recove

from Jessica Wiseman to everyone: 7:50 PM

Thank you Beth!

from Brenda Gustin to everyone: 7:50 PM

Agree: "from L Merritt MD to everyone: 7:45 PM

Why not submit our comments from tonight to the USACE team and request published written responses on your website?"

from William Avery to everyone: 7:50 PM

WELL SAID MBS!

from Mikkel Herholdt Jensen to everyone: 7:51 PM

on-point comments M B Schwehr

from JGabele to everyone: 7:51 PM

264 | We would like to see a detailed map of actual performance assurances mapped to street and residential regions for entire lower american river

from Joshua Thomas to everyone: 7:51 PM

265 | Why the necessity for so many rock trenches and toes along a straight part of the river where the levees are far apart and which has erosion resistant, Plio-Pleistocene Age Fair Oaks Formation, that is, hardpan, clay soils according to page 48 of the erosion protection analysis?

from Susan Solarz to everyone: 7:51 PM

Excellent comments

from L Merritt MD to everyone: 7:51 PM

266 | Access ramps where go where? Will possibly add more load and contribute to further damage. It is a straight stretch of river, we need a surgical approach. Thank you for giving more time.

from William Avery to everyone: 7:52 PM

Thank you Jaime!

from Sandra Sanders to everyone: 7:52 PM

I feel the same way Jaime!

from L Merritt MD to everyone: 7:52 PM

JB it is a refuge for us all, key during covid to survive and thrive together

from Naomi E to everyone: 7:52 PM

I've already observed erosion in the current project area near Sac State. took pictures. Never saw this erosion prior to the Corp project work. another area of erosion near J Street Bridge on the levee Bank. where Corp project work was done

from Michelle Stevens to everyone: 7:55 PM

Thank you to Corps staff for staying, listening and hearing us. We appreciate it.

from Naomi E to everyone: 7:55 PM

267 | why has erosion already happened in these project areas? there hasn't been much rain yet this year! can you imagine the erosion that would be happening if it rained like last year?

from C. Duke to everyone: 7:56 PM

268 | Removing over 500 trees, as proposed in American River Erosion Contract 3B South, will lead to a substantial loss of shade, 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. Has the National Park Service commented on Project 3B South, knowing that the Lower American River was granted Wild and Scenic Status based on these fish?

from J. Paul Bruton to everyone: 7:56 PM

<https://www.spk.usace.army.mil/Missions/Civil-Works/Sacramento-Levee-Upgrades/>

from George Kimmerelin to everyone: 7:56 PM

270 | Please extend the comment period and set up a in person meeting.

from pete (privately): 7:57 PM

Pete Spaulding, 916.947.8018, petenyvtca@comcast.net

from Carey Knecht to everyone: 7:57 PM

271 | There are professional services that can take a recorded meeting and create a written transcript. I'm surprised by hearing that people need to put their comments in writing to have them be truly considered.

from Naomi E to everyone: 7:57 PM

272 | i live near Sac State. lots of dust from the current project work.

from sara denzler to everyone: 7:57 PM

Please send chat from tonight to sdenzler@mac.com.

from Naomi E to everyone: 7:58 PM

273 | agree. please hire professional agency to record all verbal & written comments

from Brenda Gustin (privately): 7:58 PM

bkgustin@gmail.com for chat notes

from Bailey Hunter to everyone: 7:59 PM

publiccommentarcf16@water.ca.gov arcf_seis@usace.army.mil

from Amy Davis to everyone: 7:59 PM

Thank you!

from Brenda Gustin to everyone: 7:59 PM

Thank you, Keleigh and Paul.

from KC Sorgen - Regional Parks to everyone: 7:59 PM

The email address for the state is/was incorrect on the USACE website.

from David B to everyone: 7:59 PM

Nice job neighbors!

from Jenn to everyone: 7:59 PM

Thank you to all the participants!

from Naomi E to everyone: 7:59 PM

274 | please provide a map showing EVERY tree the Corp has planned to cut.

from Mikkell Herholdt Jensen to everyone: 7:59 PM

thank you for turning out, all

from Brenda Gustin to everyone: 8:00 PM

"from KC Sorgen - Regional Parks to everyone: 7:59 PM

275 | The email address for the state is/was incorrect on the USACE website." This really needs to be fixed. Thank you.

from Jessica Wiseman to everyone: 8:00 PM

276 | Thank you for administering tonight. If you or this isn't a place to influence future decisions, then who and how can we reach the people that can?

from J. Paul Bruton to everyone: 8:01 PM

Entering public comment is one of the primary ways you are able to have an influence

from Naomi E to everyone: 8:01 PM

americanrivertrees.org

from Jessica Wiseman to everyone: 8:02 PM

Thank you. I was a bit thrown off just then when we were told that our comments here weren't necessarily going to reach those that it would need to reach.

from Jessica Wiseman to everyone: 8:02 PM

And I was under the impression these were public comments.

from Andrea Willey, MD to everyone: 8:02 PM

Many people voiced similar concerns. I did not get the sense that anything meaningful will be done with it.

from Naomi E to everyone: 8:03 PM

<https://arpf.org/voiceoftheparkway/>

from Naomi E to everyone: 8:03 PM

we need a legal defense. anyone here with those connections?

from J. Paul Bruton to everyone: 8:03 PM

Yes - these are public comments, we are also asking people who had extensive comments to either write them here, or go to our website and enter those there.

from J. Paul Bruton to everyone: 8:03 PM

<https://www.spk.usace.army.mil/Missions/Civil-Works/Sacramento-Levee-Upgrades/>

from Jessica Wiseman to everyone: 8:04 PM

277

We were informed that the voice comments would be transcribed and included with the written chat comments for official consideration. Please correct me if that is inaccurate.

from Keleigh Duey to everyone: 8:05 PM

If you have further clarifications please join us for our January 16th meeting

from Naomi E to everyone: 8:05 PM

278

why weren't our neighborhoods informed of this project LONG BEFORE now? one flyer in the mail now??!!

from J. Paul Bruton to everyone: 8:06 PM

apologies all - but we have exceeded the 8 p.m. meeting timeframe, and must conclude the meeting. We will be here again for another public meeting on Jan. 16.

WEBVTT

1 "" (0)

00:00:00.000 --> 00:00:01.154

Hello.

2 "Bill Brattain" (1551186944)

00:00:01.154 --> 00:00:07.160

The 5 o'clock news on CBS, but I haven't had a chance to look at it yet.

3 "Christine Norman" (4139741952)

00:00:07.160 --> 00:00:13.769

I'm watching it now and, um, yeah, it's on there so we didn't Thank you.

4 "Christine Norman" (4139741952)

00:00:18.509 --> 00:00:22.200

All right.

5 "Keleigh Duey" (1771176192)

00:00:22.200 --> 00:00:44.600

Call it's 540, it's been 10 minutes. Um, while it is unfortunate that the chat box is not working. I think we just need to proceed with the presentation. Um, I can read off our email addresses. Um, we've been receiving comments already lots of comments.

6 "Keleigh Duey" (1771176192)

00:00:44.600 --> 00:00:51.420

That our email addresses, um, if we get the chat working, in the meantime, we can start using it. Um.

7 "Keleigh Duey" (1771176192)

00:00:51.420 --> 00:00:55.406

Well, you just might have to go a different route this time. Um.

8 "JulieG" (795470336)

00:00:55.406 --> 00:00:58.770

May I suggest that, um.

9 "JulieG" (795470336)

00:00:58.770 --> 00:01:09.330

You've got a Pre recorded section, I think, while you're playing that someone type up instead of reading, because it's very difficult and we're not getting accurate.

10 "JulieG" (795470336)

00:01:09.330 --> 00:01:26.730

You know, notes taken about it, somebody type on up on, like a PowerPoint or something, your contact information, where we can send questions in the written comment and post that at the end. So, it's visible because then people can grab it from there and not have mistakes in it.

11 "JulieG" (795470336)

00:01:26.730 --> 00:01:32.386

And, you know, that's something maybe you can do the auto recorded section is.

12 "J. Paul Bruton" (153558016)

00:01:32.386 --> 00:01:35.626

Once you can share, we can't.

13 "Keleigh Duey" (1771176192)

00:01:37.405 --> 00:01:41.490

Have that as the last slide? Yeah That'll be um, thank you. Thanks, Julie.

14 "Keleigh Duey" (1771176192)

00:01:41.490 --> 00:01:47.946

Go ahead. Yep. So.

15 "J. Paul Bruton" (153558016)

00:01:47.946 --> 00:01:55.800

I hear you Paul. Okay. So apologies people Murphy's at work here.

16 "J. Paul Bruton" (153558016)

00:01:55.800 --> 00:02:04.200

We did a test 1 earlier, and everything seemed to work fine and now the chat box is just not cooperating, but we're going to go ahead and get.

17 "J. Paul Bruton" (153558016)

00:02:04.200 --> 00:02:07.890

Kicked off here and we're gonna show presentation.

18 "J. Paul Bruton" (153558016)

00:02:07.890 --> 00:02:11.910

And while that presentations going, oh, work behind the scenes.

19 "J. Paul Bruton" (153558016)

00:02:11.910 --> 00:02:16.950

Make sure we get that check going, but, um, 1st, we wanted to welcome in this meeting.

20 "J. Paul Bruton" (153558016)

00:02:16.950 --> 00:02:19.950

And apologize for for the late start.

21 "J. Paul Bruton" (153558016)

00:02:19.950 --> 00:02:32.730

We're doing the Sacramento district, public meeting and a supplemental environmental impact statement subsequent environmental impact report for the American, wherever common features.

22 "J. Paul Bruton" (153558016)

00:02:32.730 --> 00:02:35.790

2016 at risk management project.

23 "J. Paul Bruton" (153558016)

00:02:35.790 --> 00:02:41.100

So so we're going to start with the presentation.

24 "J. Paul Bruton" (153558016)

00:02:41.100 --> 00:02:44.970

Provides a great deal of detail on our sacramental Levy upgrade.

25 "J. Paul Bruton" (153558016)

00:02:44.970 --> 00:02:48.690

1st, there's a couple of quick housekeeping items. We need to mention.

26 "J. Paul Bruton" (153558016)

00:02:48.690 --> 00:02:52.950

Um, the meeting, including all comments written in the chat.

27 "J. Paul Bruton" (153558016)

00:02:52.950 --> 00:02:57.472

Sorry about that because.

28 "Dennis Eckhart" (1106849792)

00:02:57.472 --> 00:03:00.054

You can see the.

29 "J. Paul Bruton" (153558016)

00:03:00.054 --> 00:03:04.192

The presentation for you. Okay. Yeah.

30 "Christine Norman" (4139741952)

00:03:04.192 --> 00:03:07.892

No, so Paul or not and please everyone if you can.

31 "Bailey Hunter" (1289876992)

00:03:07.892 --> 00:03:19.835

Yourselves we, it's not letting us if Paul mutes everyone, it's going to meet me and Kelly as well. So we're going to need you guys to meet yourselves.

32 "J. Paul Bruton" (153558016)

00:03:19.835 --> 00:03:23.514

Can you see that online communication steps? Yeah.

33 "Sean Mcneil" (2588639488)

00:03:23.514 --> 00:03:26.232

I can see a call. Okay.

34 "J. Paul Bruton" (153558016)

00:03:26.232 --> 00:03:42.510

So the meeting, including this meeting, including all comments in the chat, that will be going will be recorded while this meeting is live, the presentation has been Pre recorded to provide equal access to information for everybody who gets to.

35 "J. Paul Bruton" (153558016)

00:03:42.510 --> 00:03:51.900

Come and see it later following presentation, there will be 2 minute time slots. Everyone is asking if there's a chance to speak and we'll provide to me.

36 "J. Paul Bruton" (153558016)

00:03:51.900 --> 00:03:55.710

Time slots after this public presentation.

37 "J. Paul Bruton" (153558016)

00:03:55.710 --> 00:04:06.330

And she have a question a comment we asked the participants, please click on the hand icon. This will allow us to unmute 1 person at a time in order to speak. So, everybody is not speaking over each other.

38 "J. Paul Bruton" (153558016)

00:04:06.330 --> 00:04:11.880

We're going to try to have everybody muted during the initial presentation.

39 "J. Paul Bruton" (153558016)

00:04:11.880 --> 00:04:15.660

And if you, if we find a way to get our tech side.

40 "J. Paul Bruton" (153558016)

00:04:15.660 --> 00:04:21.540

Work in property, if you can mute yourself, that would be very helpful because all it takes is 1 or 2 people to be.

41 "J. Paul Bruton" (153558016)

00:04:21.540 --> 00:04:24.840

It and we'll start getting really destructive.

42 "J. Paul Bruton" (153558016)

00:04:24.840 --> 00:04:29.939

We also ask that if you could at during the presentation, keep the cameras off.

43 "J. Paul Bruton" (153558016)

00:04:29.939 --> 00:04:36.419

Because it takes on bandwidth and we don't want it to get all hurkey jerky. 1, let's plan, run its place smoothly.

44 "J. Paul Bruton" (153558016)

00:04:36.419 --> 00:04:44.039

So, if you run into any audio issues with the Webex, we suggest calling in, like, when gentlemen did.

45 "J. Paul Bruton" (153558016)

00:04:44.039 --> 00:04:48.539

In that information to call and is on our Sacramento, the upgrades would.

46 "J. Paul Bruton" (153558016)

00:04:48.539 --> 00:04:58.529

I will provide that. It's actually the sacramental Libby upgrades page. If you Google, sacramental Levy upgrades, it will pop up for you.

47 "J. Paul Bruton" (153558016)

00:04:58.529 --> 00:05:02.489

And then I'll put that link in the chat box when we get that going.

48 "J. Paul Bruton" (153558016)

00:05:02.489 --> 00:05:07.139

And also keep in mind, though, this has been a rough start.

49 "J. Paul Bruton" (153558016)

00:05:07.139 --> 00:05:19.739

On our website, we will have the presentation that we're showing here and all the slides. The PowerPoint slides are on there already. So you could go there and see those as you wish.

50 "J. Paul Bruton" (153558016)

00:05:19.739 --> 00:05:24.359

So, to get this started fun here.

51 "J. Paul Bruton" (153558016)

00:05:24.359 --> 00:05:27.899

Start the presentation and with a.

52 "J. Paul Bruton" (153558016)

00:05:27.899 --> 00:05:36.179

Can we do is going to the U. S Army Corps of engineers district is going to start the study the project overview.

53 "mike" (2088429312)

00:05:46.846 --> 00:05:55.930

Agency national international, environmental.

54 "Bailey Hunter" (1289876992)

00:05:55.930 --> 00:06:01.907

People can you mute? It is very echoing. I'm having a hard time understanding.

55 "J. Paul Bruton" (1920325632)

00:06:01.907 --> 00:06:16.987

Sequence the board or the resources local government agency. The Sacramento area are the non federal partners for the 2016 project slide. So.

56 "mike" (2088429312)

00:06:16.987 --> 00:06:19.645

116.

57 "J. Paul Bruton" (1920325632)

00:06:19.645 --> 00:06:24.209

Not only includes the projects that we'll be discussing today.

58 "J. Paul Bruton" (1920325632)

00:06:24.209 --> 00:06:38.686

There are many other portions. The 2016 final general reevaluation report was authorized in the water resources development act of 2016 and the construction.

59 "mike" (2088429312)

00:06:38.686 --> 00:06:46.428

Checklist past 25 criticism.

60 "J. Paul Bruton" (1920325632)

00:06:46.428 --> 00:06:50.908

Next slide I wanted to present.

61 "mike" (2088429312)

00:06:50.908 --> 00:06:54.230

For this, um.

62 "J. Paul Bruton" (1920325632)

00:06:54.230 --> 00:06:59.669

That began in 2016 and is still the purpose of this today.

63 "J. Paul Bruton" (1920325632)

00:06:59.669 --> 00:07:13.049

Generally, the purpose is to address the secrets slip stability, erosion and high concerns on levies along the Sacramento and American rivers to improve flood risk management in the Sacramento metropolitan area. Yep.

64 "J. Paul Bruton" (1920325632)

00:07:13.049 --> 00:07:32.489

Sacramento is located with the natural plane, do the due to the confluence of the American and Sacramento rivers, and is actually 1 of the most at risk cities in the entire nation for catastrophic flooding as you can see in this photo of the river. This occurred in 986 it was.

65 "J. Paul Bruton" (1920325632)

00:07:32.489 --> 00:07:42.149

Pretty serious original event in the river Park neighborhood, which is just adjacent to the bridge and it nearly became a catastrophic flood.

66 "J. Paul Bruton" (1920325632)

00:07:42.149 --> 00:08:02.149

There is an unacceptably high risk of flooding from lobby failure that threatens the public safety of over a half 1Million people and nearly 100,000 structures, including homes, the hydraulic modeling completed for the 2016 study, which you can see in these figures on the right.

67 "J. Paul Bruton" (1920325632)

00:08:02.149 --> 00:08:15.089

Frustrated that flooding could reach a depth of over 20 feet in some areas and cause up to 4Billion dollars in damages, which is an enormous economic disaster that would impact the local state and federal economy.

68 "J. Paul Bruton" (1920325632)

00:08:15.089 --> 00:08:23.759

So that that dollar amount is actually in 2016 values. So that does not consider inflation, um, to today in 2024.

69 "J. Paul Bruton" (1920325632)

00:08:23.759 --> 00:08:28.376

Now, since the 2016 study, the.

70 "mike" (2088429312)

00:08:28.376 --> 00:08:38.975

Federal project is completed, increase the maximum, 260 dollars per 2nd.

71 "J. Paul Bruton" (1920325632)

00:08:38.975 --> 00:08:41.395

The current in.

72 "mike" (2088429312)

00:08:41.395 --> 00:08:43.836

Is everything storage? Yeah Yeah.

73 "J. Paul Bruton" (1920325632)

00:08:43.836 --> 00:09:04.559

Combined with flow requires Levy and infrastructure improvements throughout the downstream Levy network increase bills from Folsom, lead to higher water surface, elevations in the river channel, higher velocities due to the constricted Levy system and substantially increased levee erosion that could ultimately lead to levee failure.

74 "J. Paul Bruton" (1920325632)

00:09:04.559 --> 00:09:19.319

We failure has the potential to lead to immediate loss of life and injury to people in neighboring communities as well as health and public safety concerns associated with flood damages, including lack of electricity, clean water or access to emergency care.

75 "J. Paul Bruton" (1920325632)

00:09:19.319 --> 00:09:29.669

Next slide after the 2016 project was authorized by Congress. USA's began the detailed design.

76 "J. Paul Bruton" (1920325632)

00:09:29.669 --> 00:09:49.669

Rivers surveys are completed by boat with visual inspections of each river reach reaches, were ranked by current status and included levels of existing erosion geotechnical and soil sampling was conducted following that visual ranking afterwards reaches regrouped into projects and projects were then prioritized based on their.

77 "J. Paul Bruton" (1920325632)

00:09:49.669 --> 00:09:59.039

Stability and sequence to provide flood risk reduction benefits to communities with the highest life safety risk and most costly flood related damages.

78 "J. Paul Bruton" (1920325632)

00:09:59.039 --> 00:10:15.329

As you can see, there are several projects that have already been completed. Some of these include the Sacramento river East Levy seepage, stability, overlapping project. We have the Sacramento aware, and bypass winding project, which is under construction. Now.

79 "J. Paul Bruton" (1920325632)

00:10:15.329 --> 00:10:25.289

And please note that all of the prior environmental documentation for already constructed contracts is available on the website sack Levy upgrades dot com, which will be provided later.

80 "J. Paul Bruton" (1920325632)

00:10:25.289 --> 00:10:45.929

Next slide, so the need for this supplemental environmental impact statement. Subsequent environmental impact report will refer to it as the is needed to analyze the design refinements that have occurred since the 2016 was finalized.

81 "J. Paul Bruton" (1920325632)

00:10:45.929 --> 00:11:04.889

In the past 8 years there have been design refinements to the following project components, including American river version contract 3 B4, 8 and 4 B, Sacramento river erosion contract 3 the magpie creek project, American river and Sacramento river mitigation sites and a pedometer network.

82 "J. Paul Bruton" (1920325632)

00:11:04.889 --> 00:11:24.889

Some of these design refinements include changes to the scope location design or construction details. These refinements resulted due to new engineering data such as the geotechnical investigations, hydraulic modeling, improve technology and research updates in federal, local.

83 "J. Paul Bruton" (1920325632)

00:11:24.889 --> 00:11:37.109

State and even Levy safety policy and environmental compliance regulations, for example, new executive orders that have been passed regarding climate change, greenhouse gases and environmental justice.

84 "J. Paul Bruton" (1920325632)

00:11:37.109 --> 00:11:46.739

We expect that the record of decision and the California environmental quality X certification will occur. Um, late summer fall this year.

85 "J. Paul Bruton" (1920325632)

00:11:46.739 --> 00:12:03.419

Excellent I want to direct your attention to the map so that you can identify all of the separate project components. They are all within Sacramento County. Um, we will start on the American river.

86 "J. Paul Bruton" (1920325632)

00:12:03.419 --> 00:12:23.419

As you can see towards the East American river erosion contracts, 3, B, North and 3 B, South, they're pink and orange. Also, American progression contract for B is in blue. If you go downstream, there is a yellow polygon that is American river erosion contract for a.

87 "J. Paul Bruton" (1920325632)

00:12:23.419 --> 00:12:29.879

Even further downstream towards the confluence of the Sacramento river is the American river mitigation site and bread.

88 "J. Paul Bruton" (1920325632)

00:12:29.879 --> 00:12:49.879

If we go north, just north of Sacramento, you will see a brown line. That's the magpie creek project. If we go back to the Sacramento river, and we go south into the pocket neighborhoods, we will find Sacramento river erosion contract 3, most to green lines, long levies, further south. And in that separate.

89 "J. Paul Bruton" (1920325632)

00:12:49.879 --> 00:12:59.069

Box is the Sacramento river mitigation site, and that's a little purple triangle and it's along some along the Sacramento river and, um.

90 "J. Paul Bruton" (1920325632)

00:12:59.069 --> 00:13:19.069

Towards down towards the Delta, so the intent of this report that we're presenting today is to present you the proposed project with alternatives, describe the alternative selection process to demonstrate that the analyzation of the short and long term impacts associated with the project, including human.

91 "J. Paul Bruton" (1920325632)

00:13:19.069 --> 00:13:34.559

Ecological and biological and cultural resources Additionally, we will describe, um, if significant impacts rose and, um, in the document, we propose mitigation measures that can be implemented prior during or after construction.

92 "J. Paul Bruton" (1920325632)

00:13:34.559 --> 00:13:37.679

Excellent.

93 "J. Paul Bruton" (1920325632)

00:13:37.679 --> 00:13:58.789

So, I want to briefly go over these design refinements by project component and they will be discussed in detail just after I'm done. So, I'll start with American river. There's a variety of contracts, and the reason that we included these in this document as is because we have refined erosion.

94 "J. Paul Bruton" (1920325632)

00:13:58.789 --> 00:14:11.549

Methods to include, um, illogical toe protection. This erosion protection method is used to provide better onsite mitigation, fisheries, habitat, and actually decreases the impacts to the heritage oak trees.

95 "J. Paul Bruton" (1920325632)

00:14:11.549 --> 00:14:31.549

It also we've refine the whole routes in staging areas. We've added a contract due to new hydraulic modeling to better protect the state route, 160 bridge from severe erosion, due to high velocity in the river channel. And these are fine designs also require more rock and soil materials.

96 "J. Paul Bruton" (1920325632)

00:14:31.549 --> 00:14:44.489

Additionally, the, the contract on the Sacramento river, similarly, we have refined the erosion protection methods for the logical toe protection to provide better onsite mitigation.

97 "J. Paul Bruton" (1920325632)

00:14:44.489 --> 00:15:01.799

There's been identification inside staging areas. Additionally the 2016 document originally assumed that work would be completed in the river by March. Now, we will be operating with construction equipment on the river shoreline.

98 "J. Paul Bruton" (1920325632)

00:15:01.799 --> 00:15:07.529

Similar to the American river, these refined designs require more soil and rock material.

99 "J. Paul Bruton" (1920325632)

00:15:07.529 --> 00:15:19.229

Next slide the magpie creek project north of Sacramento includes the Levy extension, whining and realignment of a portion of the magpie creek diversion channel.

100 "J. Paul Bruton" (1920325632)

00:15:19.229 --> 00:15:35.759

Additionally, this project will include culverts beneath the Sacramento river bike trails, new flow, adjustments to allow for water attention upstream of really? Boulevard. There will be network and a full road closure at really Boulevard for a portion of construction.

101 "J. Paul Bruton" (1920325632)

00:15:35.759 --> 00:15:51.119

The parameter network was not described in the 2016, and this includes a groundwater data collection system that will be implemented after construction to monitor the Levy improvement performance.

102 "J. Paul Bruton" (1920325632)

00:15:51.119 --> 00:16:09.209

The mitigation sites have been further designed than were presented in the 2016 documents. The American river mitigation site is 100 about 120 acres. It'll be newly constructed and that exists in the American river Parkway.

103 "J. Paul Bruton" (1920325632)

00:16:09.209 --> 00:16:13.829

There are the species and habitats here. Um.

104 "J. Paul Bruton" (1920325632)

00:16:13.829 --> 00:16:31.619

That we will get into detail, um, further in the slides, the Sacramento river mitigation site will be also about a newly constructed mitigation site about 200 acres that's located at Grant island. On the Sacramento river near the confluence of the cash. And Steamboat sleeps.

105 "J. Paul Bruton" (1920325632)

00:16:31.619 --> 00:16:41.429

The listed species and habitats that we will be constructing to provide habitat for are listed here. Um, like I said, we'll get into the details further on.

106 "J. Paul Bruton" (1920325632)

00:16:41.429 --> 00:17:01.429

Now, I let my colleague MS Bailey hunter discuss the details of the American river erosion contracts for B, and for a Sacramento river erosion contract, 3, and the magpie creek project. She'll be starting off with American river erosion contract, which has 1 of the highest risks of Levy failure and.

107 "J. Paul Bruton" (1920325632)

00:17:01.429 --> 00:17:06.479

The life safety in the region, and is the number 1 priority for you say Sacramento district.

108 "J. Paul Bruton" (1920325632)

00:17:06.479 --> 00:17:14.669

Hello, my name is Bill Hunter, the Army Corps I'm going to go over some of the projects and the.

109 "J. Paul Bruton" (1920325632)

00:17:14.669 --> 00:17:19.979

Environmental impacts that our team found when we did our analysis.

110 "J. Paul Bruton" (1920325632)

00:17:19.979 --> 00:17:24.539

Let us start on the American river with American river erosion contract 3. D.

111 "J. Paul Bruton" (1920325632)

00:17:24.539 --> 00:17:34.559

This is an erosion project. It's technically actually made up of 2 contracts. 3, the North and south through the North is made up of 3. 1.

112 "J. Paul Bruton" (1920325632)

00:17:34.559 --> 00:17:44.628

Which is in between Avenue and what avenue the north side of the river and site for 2, which is between what Avenue and kind of the bureau.

113 "mike" (2088429312)

00:17:44.628 --> 00:17:48.992

The school area south is made a profit.

114 "J. Paul Bruton" (1920325632)

00:17:48.992 --> 00:17:50.550

Just so.

115 "mike" (2088429312)

00:17:50.550 --> 00:17:52.094

I'm.

116 "J. Paul Bruton" (1920325632)

00:17:52.094 --> 00:17:57.959

He has made up of the version protection measures that we.

117 "J. Paul Bruton" (1920325632)

00:17:57.959 --> 00:18:05.669

Stick site by site very specific locations to try and minimize environmental impacts as much as possible. We have.

118 "J. Paul Bruton" (1920325632)

00:18:05.669 --> 00:18:14.939

Levy and bank think protection, which is placing fulfilled rock over the ground, placing a little bit of soil and pop. So we can play it.

119 "J. Paul Bruton" (1920325632)

00:18:14.939 --> 00:18:22.619

We have very logical trench, which is essentially buried revetment. So, as the riverbank roads away.

120 "J. Paul Bruton" (1920325632)

00:18:22.619 --> 00:18:26.969

Eventually, it'll hit that buried commitment, which will launch and stop further.

121 "J. Paul Bruton" (1920325632)

00:18:26.969 --> 00:18:35.369

Experience so we can put it on top of it. We are honorable toes, which is putting kind of a back over in the river.

122 "J. Paul Bruton" (1920325632)

00:18:35.369 --> 00:18:43.049

Which allows us to have plenty of inches behind it and as the rank roads, it'll launch and stop for the erosion.

123 "J. Paul Bruton" (1920325632)

00:18:43.049 --> 00:18:47.609

Right next to contract is contract for B.

124 "J. Paul Bruton" (1920325632)

00:18:47.609 --> 00:18:54.689

And basically, it when the design team was doing their analysis, they determined that there are some trees right next to that.

125 "J. Paul Bruton" (1920325632)

00:18:54.689 --> 00:18:59.519

Are at risk of what we're calling scour, which essentially is.

126 "J. Paul Bruton" (1920325632)

00:18:59.519 --> 00:19:06.479

Trees kind of by themselves that are pretty big in at certain velocities the eddies kind of, um, of the water.

127 "J. Paul Bruton" (1920325632)

00:19:06.479 --> 00:19:19.499

Kind of go around the tree and roadway around the base of the tree, which puts the Olivia at risk. So is looking at different measures, like placing gravel or placing resentment or in some cases.

128 "J. Paul Bruton" (1920325632)

00:19:19.499 --> 00:19:26.309

Having to cut down the tree to prevent that from occurring and this.

129 "J. Paul Bruton" (1920325632)

00:19:26.309 --> 00:19:36.179

The work is 1 location on our side of the river just downstream of what? And 1 location is on the South Side river, just downstream of large park. Next slide. Please.

130 "J. Paul Bruton" (1920325632)

00:19:36.179 --> 00:19:41.969

The environmental impacts that we found are listed below.

131 "J. Paul Bruton" (1920325632)

00:19:41.969 --> 00:19:55.049

Big 1 is recreation all the projects in the American river Parkway. We will be disrupting during construction and staging, which is going to impact people wanting to recreate.

132 "J. Paul Bruton" (1920325632)

00:19:55.049 --> 00:20:00.779

For transportation and circulation, we're going to be adding a lot of hall trucks to.

133 "J. Paul Bruton" (1920325632)

00:20:00.779 --> 00:20:05.639

Environmental justice, those all tracks are going to pass through disadvantage communities.

134 "J. Paul Bruton" (1920325632)

00:20:05.639 --> 00:20:20.099

Aesthetics and visual impacts the vegetation we have to remove to install the erosion features will decrease the visual character of the area until we're able to get plants and trees to establish.

135 "J. Paul Bruton" (1920325632)

00:20:20.099 --> 00:20:28.109

For water quality, we found that some trees that might be removed near the water's edge could increase the water temperature.

136 "J. Paul Bruton" (1920325632)

00:20:28.109 --> 00:20:39.869

Until vegetation establishes for air quality and climate change there, it was determined. There's high marks and greenhouse gas emissions from the hall trucks and construction equipment.

137 "J. Paul Bruton" (1920325632)

00:20:39.869 --> 00:20:46.829

Noise and vibration, the levies are pretty close to homes so high and we love noise levels from construction could distract.

138 "J. Paul Bruton" (1920325632)

00:20:46.829 --> 00:20:50.069

Sensitive receptors and sensitive receptors and we mean.

139 "J. Paul Bruton" (1920325632)

00:20:50.069 --> 00:20:57.659

People living in their homes, or people are recreating and wanting to enjoy the pristine area that kind of.

140 "J. Paul Bruton" (1920325632)

00:20:57.659 --> 00:21:07.739

Stuff or vegetation, wildlife, fisheries, and special status species. We have to do have a cat removal and disturbance in order to install our version protection features.

141 "J. Paul Bruton" (1920325632)

00:21:07.739 --> 00:21:10.919

As I mentioned, we are going to be replanting.

142 "J. Paul Bruton" (1920325632)

00:21:10.919 --> 00:21:17.159

Slide please, um, the other erosion project on.

143 "J. Paul Bruton" (1920325632)

00:21:17.159 --> 00:21:26.099

The American river is American river ocean contract 4:8:is on the north side of the river just upstream of State route 160.

144 "J. Paul Bruton" (1920325632)

00:21:26.099 --> 00:21:31.889

This makes it looks like it's a really big project, but actually the eroding features is just a small burn.

145 "J. Paul Bruton" (1920325632)

00:21:31.889 --> 00:21:36.689

Um, just next to the bridge.

146 "J. Paul Bruton" (1920325632)

00:21:36.689 --> 00:21:42.629

The problem is and that berm is a velocity diversion firms. So the.

147 "J. Paul Bruton" (1920325632)

00:21:42.629 --> 00:21:54.779

The risk at the site is version from velocities, but also a major risk is erosion from pure scour. So similar to what I was saying about laundry scower the eddies at certain velocities.

148 "J. Paul Bruton" (1920325632)

00:21:54.779 --> 00:22:01.259

Um, kind of go around to the pier and scour away risking putting lobby at risk of failure.

149 "J. Paul Bruton" (1920325632)

00:22:01.259 --> 00:22:06.779

So, we are proposing to build a burn that would deflect those philosophies away.

150 "J. Paul Bruton" (1920325632)

00:22:06.779 --> 00:22:13.499

Problem is the location where that needs to be is on top of the Smith memorial trail.

151 "J. Paul Bruton" (1920325632)

00:22:13.499 --> 00:22:22.169

So, we're having to do a permanent reroute of the memorial trail in order to install this work. So, a lot of that.

152 "J. Paul Bruton" (1920325632)

00:22:22.169 --> 00:22:27.419

Stuff you're seeing on the map is actually the reroute to, um.

153 "J. Paul Bruton" (1920325632)

00:22:27.419 --> 00:22:30.749

Allow, uh, recreation to continue.

154 "J. Paul Bruton" (1920325632)

00:22:30.749 --> 00:22:39.899

Next slide please. So, as I mentioned, a big recreational impact is.

155 "J. Paul Bruton" (1920325632)

00:22:39.899 --> 00:22:49.949

That the origin features are going to block the memorial trail and we're having to do you're out in the floodplain but initially we are still in the American Red Parkway. So we are going to be disrupting during construction.

156 "J. Paul Bruton" (1920325632)

00:22:49.949 --> 00:23:04.589

The transportation and circulation similar to the contract. 3 begin. 4. B we are adding haul trucks to local roads for air quality and climate change. We found high knocks and greenhouse gas emissions associated with haul trucks and construction equipment.

157 "J. Paul Bruton" (1920325632)

00:23:04.589 --> 00:23:12.179

For the vibration, this is a high recreational area, so the noise could disturb recreational lists.

158 "J. Paul Bruton" (1920325632)

00:23:12.179 --> 00:23:21.629

Vegetation wildlife and special status species. We are having to do habitat removal in order to install the erosion features and a little bit.

159 "J. Paul Bruton" (1920325632)

00:23:21.629 --> 00:23:34.049

In order to install the bike trail reroute unfortunately, because of the location of the diversion burn. It is in the vet free zone. So we can't replace the site with Woody vegetation.

160 "J. Paul Bruton" (1920325632)

00:23:34.049 --> 00:23:44.159

So, we would be planting grasses and maybe some Forbes, and in addition we are kind of adjusting the topography for that by trail reroute which.

161 "J. Paul Bruton" (1920325632)

00:23:44.159 --> 00:23:50.099

There's a possibility we could risk increasing training at the site next slide. Please.

162 "J. Paul Bruton" (1920325632)

00:23:50.099 --> 00:23:55.739

For for a we looked at a few different alternatives.

163 "J. Paul Bruton" (1920325632)

00:23:55.739 --> 00:24:04.679

So, the very 1st map you're seeing is the proposed alternative. The 2nd mapped alternative 3 would be a.

164 "J. Paul Bruton" (1920325632)

00:24:04.679 --> 00:24:08.369

That would have similar impact to the proposed action.

165 "J. Paul Bruton" (1920325632)

00:24:08.369 --> 00:24:15.569

Except for there'd be less vegetation, wildlife, fish, special species, habitat impacts less recreational impact.

166 "J. Paul Bruton" (1920325632)

00:24:15.569 --> 00:24:20.939

Reverse impacts and no impact to risk of the streaming.

167 "J. Paul Bruton" (1920325632)

00:24:20.939 --> 00:24:23.939

Alternative it would be a similar.

168 "J. Paul Bruton" (1920325632)

00:24:23.939 --> 00:24:29.279

By trail reroute, except for instead of going under the railroad and connecting.

169 "J. Paul Bruton" (1920325632)

00:24:29.279 --> 00:24:36.899

Further down, we would shoot up parallel to the railroad and connect back to the bacteria just past the berm.

170 "J. Paul Bruton" (1920325632)

00:24:36.899 --> 00:24:42.479

That is similar to proposed action, except they're there to be slightly.

171 "J. Paul Bruton" (1920325632)

00:24:42.479 --> 00:24:47.489

Lower impact to the overall habitat, but slightly higher impact to special species habitat.

172 "J. Paul Bruton" (1920325632)

00:24:47.489 --> 00:24:50.639

Alternatives would.

173 "J. Paul Bruton" (1920325632)

00:24:50.639 --> 00:25:00.359

Be a, instead of going into the flood plain for a bike trail detour we would have the bicycle around the berm. However, we'd still need a temporary detour for.

174 "J. Paul Bruton" (1920325632)

00:25:00.359 --> 00:25:05.849

Hopes to get around during construction, so we would still have to impact those areas.

175 "J. Paul Bruton" (1920325632)

00:25:05.849 --> 00:25:12.869

It would have a similar impact to the production, except for higher impact on edge wildlife.

176 "J. Paul Bruton" (1920325632)

00:25:12.869 --> 00:25:18.809

Special status species, There'll be lower impact. The risk of the standing.

177 "J. Paul Bruton" (1920325632)

00:25:18.809 --> 00:25:32.189

3 D, would have a longer bike trail detour or reroute, which go further down into the floodplain and be similar to the proposed action, except for to have a higher impact on our life.

178 "J. Paul Bruton" (1920325632)

00:25:32.189 --> 00:25:35.819

Special status species next slide please.

179 "J. Paul Bruton" (1920325632)

00:25:35.819 --> 00:25:46.889

Now, we're moving on to the Sacramento river, so this is the only erosion project on the Sacramento river and this environmental document Sacramento river urgent contract 3.

180 "J. Paul Bruton" (1920325632)

00:25:46.889 --> 00:25:56.789

It is along parts of the pocket neighborhood so you see in the 1st map that's on the northern part and the other map is on the southern part.

181 "J. Paul Bruton" (1920325632)

00:25:56.789 --> 00:26:02.879

Is a mixture of kind of a being placed.

182 "J. Paul Bruton" (1920325632)

00:26:02.879 --> 00:26:08.159

Upgrade and launch toe, which I kind of talked about with as well.

183 "J. Paul Bruton" (1920325632)

00:26:08.159 --> 00:26:20.519

And then some tie backs, you'll notice in these maps, there's a lot less access and that is because the materials for construction are being brought in by barges instead of hall trucks.

184 "J. Paul Bruton" (1920325632)

00:26:24.119 --> 00:26:30.179

So, there are some is the visual impacts due to vegetation removal, which would you use the visual character.

185 "J. Paul Bruton" (1920325632)

00:26:30.179 --> 00:26:35.129

On the area for water quality, removal trees along the.

186 "J. Paul Bruton" (1920325632)

00:26:35.129 --> 00:26:40.949

Riverbank could increase the water temperature, air, quality, climate change. We.

187 "J. Paul Bruton" (1920325632)

00:26:40.949 --> 00:26:47.249

Found high knocks and greenhouse gas emissions associated with barges and construction equipment.

188 "J. Paul Bruton" (1920325632)

00:26:47.249 --> 00:26:53.069

For noise and vibration we are near neighborhoods, so There'll be.

189 "J. Paul Bruton" (1920325632)

00:26:53.069 --> 00:26:56.639

The levels that could disrupt sensitive receptors.

190 "J. Paul Bruton" (1920325632)

00:26:56.639 --> 00:27:08.129

For vegetation and fish, fish, wildlife and special style species habitat removal and disturbance is required for installation of the erosion protection features. Next slide. Please.

191 "J. Paul Bruton" (1920325632)

00:27:08.129 --> 00:27:14.189

And then we have a quick project, which is along the.

192 "J. Paul Bruton" (1920325632)

00:27:14.189 --> 00:27:28.349

Division channel if you're unfamiliar, it's north of Sacramento kind of near Rio Linda. If you're familiar with the jet or the water skis, you can see the big ponds just north of the project.

193 "J. Paul Bruton" (1920325632)

00:27:28.349 --> 00:27:33.749

You'll also see, really Boulevard on the right so this project is a mixture.

194 "J. Paul Bruton" (1920325632)

00:27:33.749 --> 00:27:38.609

So, the other products we talked about, where erosion this project is usage instability.

195 "J. Paul Bruton" (1920325632)

00:27:38.609 --> 00:27:45.599

It's a mixture of widening the channel, modifying the channel, extending the Levy and installing some culverts under.

196 "J. Paul Bruton" (1920325632)

00:27:45.599 --> 00:27:49.379

Really Boulevard and the bike trail next slide please.

197 "J. Paul Bruton" (1920325632)

00:27:49.379 --> 00:27:57.659

So, the environmental impacts we are constructing, as I mentioned some culverts under the North.

198 "J. Paul Bruton" (1920325632)

00:27:57.659 --> 00:28:07.649

Northern bike trail, so we're going to require some tours for transportation and circulation. Really? Boulevard would be closed for work and it's going to require some traffic tours.

199 "J. Paul Bruton" (1920325632)

00:28:07.649 --> 00:28:11.219

In addition hot trucks will be added to local roads.

200 "J. Paul Bruton" (1920325632)

00:28:11.219 --> 00:28:15.689

Environmental justice, those all trucks would be going through some disadvantaged communities.

201 "J. Paul Bruton" (1920325632)

00:28:15.689 --> 00:28:21.839

For water, quality construction could cost short term while water, quality issues. Once water is reintroduced to.

202 "J. Paul Bruton" (1920325632)

00:28:21.839 --> 00:28:25.649

To the new and wire channel so basically we're gonna go in.

203 "J. Paul Bruton" (1920325632)

00:28:25.649 --> 00:28:29.609

And kind of dig out the channel and make it wider. Um.

204 "J. Paul Bruton" (1920325632)

00:28:29.609 --> 00:28:40.679

But we're gonna be storing stuff up so once we reintroduce water back into that channel, all that stuff we've kind of stirred up is going to be pushed out. So it only be a water quality impact, right? When we.

205 "J. Paul Bruton" (1920325632)

00:28:40.679 --> 00:28:45.689

We introduced water back in for air quality and climate change. We saw high.

206 "J. Paul Bruton" (1920325632)

00:28:45.689 --> 00:28:50.279

Oxen greenhouse gas emissions associated with hot trucks and construction equipment.

207 "J. Paul Bruton" (1920325632)

00:28:50.279 --> 00:28:54.869

For noise and vibration the rest of homes with the areas that there'd be high noises.

208 "J. Paul Bruton" (1920325632)

00:28:54.869 --> 00:29:04.529

That could disrupt sensitive receptors or hydraulics and butlins. There are impacts to wetlands Easter really? Boulevard. And in addition it was found that there's a.

209 "J. Paul Bruton" (1920325632)

00:29:04.529 --> 00:29:12.629

Downstairs downstream stage increase, just a stream of the northern bike trail on rubble creek due to increased.

210 "J. Paul Bruton" (1920325632)

00:29:12.629 --> 00:29:18.179

I clicked the version channel capacity during high events, larger than.

211 "J. Paul Bruton" (1920325632)

00:29:18.179 --> 00:29:28.139

7% Hi, everyone, I'm the leader, and I'm going to switch gears slightly and move away from the bank improvements. The mitigation.

212 "J. Paul Bruton" (1920325632)

00:29:28.139 --> 00:29:36.989

As we all know the supplemental environmental impact statement is the umbrella document to show compliance with all environmental.

213 "J. Paul Bruton" (1920325632)

00:29:36.989 --> 00:29:44.309

Some of those laws require mitigation, which didn't take many forms, but I'm going to focus on species and habitat medication.

214 "J. Paul Bruton" (1920325632)

00:29:44.309 --> 00:29:50.249

The site design teams start with the entire study area, identifying the need.

215 "J. Paul Bruton" (1920325632)

00:29:50.249 --> 00:29:53.699

So clearly laid out at the beginning.

216 "J. Paul Bruton" (1920325632)

00:29:53.699 --> 00:29:58.139

The risk and the, we narrow in on locations that need the work.

217 "J. Paul Bruton" (1920325632)

00:29:58.139 --> 00:30:03.089

Then, as they design the repair work, the overall sorts of inside.

218 "J. Paul Bruton" (1920325632)

00:30:03.089 --> 00:30:08.879

These steps are known as avoiding and minimizing very impacts.

219 "J. Paul Bruton" (1920325632)

00:30:08.879 --> 00:30:14.579

Then the unavoidable impact 1st, on site as much as possible and then.

220 "J. Paul Bruton" (1920325632)

00:30:14.579 --> 00:30:22.499

Repair works is designed to incorporate native vegetation on the, to the maximum extent possible.

221 "J. Paul Bruton" (1920325632)

00:30:22.499 --> 00:30:29.099

Which can look like very broad stretches silver, laying back things for a softer slope.

222 "J. Paul Bruton" (1920325632)

00:30:29.099 --> 00:30:34.529

And including bioengineering all of these methods allow vegetation to grow back on site.

223 "J. Paul Bruton" (1920325632)

00:30:34.529 --> 00:30:40.979

When construction is finished and the vegetation is planted, it will be irrigated and maintained for a few years.

224 "J. Paul Bruton" (1920325632)

00:30:40.979 --> 00:30:45.899

To ensure that it will continue to grow and recreate the habitat that has been disturbed.

225 "J. Paul Bruton" (1920325632)

00:30:45.899 --> 00:30:54.029

This photograph on the rate show, an example of older repair sites done on the lower American river.

226 "J. Paul Bruton" (1920325632)

00:30:54.029 --> 00:30:58.259

It started in May of 2001 with some.

227 "J. Paul Bruton" (1920325632)

00:30:58.259 --> 00:31:03.119

Basic plantings in proper amendment at the bottom of the legislature.

228 "J. Paul Bruton" (1920325632)

00:31:03.119 --> 00:31:11.099

And then over time, you can see how the vegetation grew back in creating the repairing corridor that we are familiar with today, over by.

229 "J. Paul Bruton" (1920325632)

00:31:11.099 --> 00:31:23.039

Next slide now, unfortunately, not all of our habitat mitigation can be completed within the prepared footprint.

230 "J. Paul Bruton" (1920325632)

00:31:23.039 --> 00:31:32.489

Which requires the project partners to go outside of the construction footprint and identify locations suitable for replacing the loss habitat and functions in.

231 "J. Paul Bruton" (1920325632)

00:31:32.489 --> 00:31:40.139

This next site is on the Sacramento river. It's the Sacramento river mitigation site or s. R. M. S. for short.

232 "J. Paul Bruton" (1920325632)

00:31:40.139 --> 00:31:46.709

The site is strategically located as a confluence of cash street blue, the Sacramento river and Steamboat.

233 "J. Paul Bruton" (1920325632)

00:31:46.709 --> 00:31:49.739

Right on the mandatory corridor for all of our lists.

234 "J. Paul Bruton" (1920325632)

00:31:49.739 --> 00:31:54.119

Currently, the land is upland habitat.

235 "J. Paul Bruton" (1920325632)

00:31:54.119 --> 00:31:59.879

But after the mitigation project will be completed, it's going to provide habitat and a food source.

236 "J. Paul Bruton" (1920325632)

00:31:59.879 --> 00:32:05.759

Salmon Delta smelt in green surgeons. I reconnected the footprint have attached.

237 "J. Paul Bruton" (1920325632)

00:32:05.759 --> 00:32:14.849

Then appropriate, native vegetation will be planted around the higher elevation to ensure their stuff over habitat for a migratory.

238 "J. Paul Bruton" (1920325632)

00:32:14.849 --> 00:32:26.819

Next time the environmental impacts are all resulting from the construction and creating the new habitat such as a water quality turbidity when we're connecting.

239 "J. Paul Bruton" (1920325632)

00:32:26.819 --> 00:32:36.989

The river to the constructive site, greenhouse gas emissions, associated with equipment, moving material around onsite, carving out our channels.

240 "J. Paul Bruton" (1920325632)

00:32:36.989 --> 00:32:45.899

They'll also be some visual impact to the folks driving along highway 160. you can see the grand island sites from across the river.

241 "J. Paul Bruton" (1920325632)

00:32:45.899 --> 00:32:54.749

Next week multiple alternatives are considered to this mitigation site and eliminated before the document to.

242 "J. Paul Bruton" (1920325632)

00:32:54.749 --> 00:33:00.869

The alternatives that remain are the purchase of mitigation credits for all mitigation requirements for LTC.

243 "J. Paul Bruton" (1920325632)

00:33:00.869 --> 00:33:15.509

The next is purchasing a different part of land and constructing connected floodplain, habitat elsewhere on the Sacramento river and Dewey combined base credit purchase for anything that we're not able to construct.

244 "J. Paul Bruton" (1920325632)

00:33:15.509 --> 00:33:26.549

Lastly is a combination project focusing on 1 of national registry service recovery projects, combined with purchasing mitigation credit.

245 "J. Paul Bruton" (1920325632)

00:33:26.549 --> 00:33:31.319

Each of these has their own pros and cons.

246 "J. Paul Bruton" (1920325632)

00:33:31.319 --> 00:33:40.559

And they are discussed further in the document here, we're showing the American river mitigation site or arms.

247 "J. Paul Bruton" (1920325632)

00:33:40.559 --> 00:33:44.999

The site is located next to discovery part on the north bank of America.

248 "J. Paul Bruton" (1920325632)

00:33:44.999 --> 00:33:52.049

Currently area consists of manmade ponds, surrounded by managed upwards with a fringe over a period.

249 "J. Paul Bruton" (1920325632)

00:33:52.049 --> 00:33:59.279

After the mitigation project will be connected for planes that is innovative year round at different water elevation.

250 "J. Paul Bruton" (1920325632)

00:33:59.279 --> 00:34:03.479

Providing really habitat and food sources in and steal that.

251 "J. Paul Bruton" (1920325632)

00:34:03.479 --> 00:34:11.039

The newly adjusted elevations we planted was appropriate native vegetation, which will allow stuff over habitat reserved.

252 "J. Paul Bruton" (1920325632)

00:34:11.039 --> 00:34:16.169

A quarter for all of the wildlife that currently in the warmer.

253 "J. Paul Bruton" (1920325632)

00:34:16.169 --> 00:34:25.409

And will create some elderberry, Savannah, habitat around the highest elevation targeting mitigations for all of our endangered species.

254 "J. Paul Bruton" (1920325632)

00:34:25.409 --> 00:34:38.009

Next late, so there's quite a few environmental impacts associated with this 1 very similar to the cyber mitigation site. The greenhouse gas emissions and noise equipment, moving dirt.

255 "J. Paul Bruton" (1920325632)

00:34:38.009 --> 00:34:43.649

There'll be some water quality impact when we connect the channels to the rivers.

256 "J. Paul Bruton" (1920325632)

00:34:43.649 --> 00:34:49.019

And there will also be temporary impact to the visual aesthetic and recreation.

257 "J. Paul Bruton" (1920325632)

00:34:49.019 --> 00:34:52.379

We will have some trail impacts.

258 "J. Paul Bruton" (1920325632)

00:34:52.379 --> 00:34:59.009

Folks using the parkway for recreation and using the river for recreation. We'll be able to see the construction occurring.

259 "J. Paul Bruton" (1920325632)

00:34:59.009 --> 00:35:04.529

Lastly, this is well known for a cultural significance to local trips.

260 "J. Paul Bruton" (1920325632)

00:35:04.529 --> 00:35:10.529

Next I'm going to hand it over to Mr Josh brown and he's going to talk about our I'll turn it.

261 "J. Paul Bruton" (1920325632)

00:35:10.529 --> 00:35:18.959

Good evening my name is Josh brown, and with the California Department water resources division of flood management, flood project branch.

262 "J. Paul Bruton" (1920325632)

00:35:18.959 --> 00:35:24.419

During scoping written comment was received from the Sacramento County Department of regional parks.

263 "J. Paul Bruton" (1920325632)

00:35:24.419 --> 00:35:33.449

Regional parks requested an alternative for the American river mitigation site that returned that retained a portion of the existing pond, be considered.

264 "J. Paul Bruton" (1920325632)

00:35:33.449 --> 00:35:38.159

Regional parks provided a specific conceptual design in their comment letter.

265 "J. Paul Bruton" (1920325632)

00:35:38.159 --> 00:35:48.959

The alternative design proposed by regional parks was included and analyzed as alternative for a, and, and is shown in the upper left side of this slide.

266 "J. Paul Bruton" (1920325632)

00:35:48.959 --> 00:35:55.379

Although regional parks identified the alternative as requiring little or no soil import.

267 "J. Paul Bruton" (1920325632)

00:35:55.379 --> 00:36:09.389

Subsequent investigations of the armed site indicated that much of the soil material on site is unsuitable for reuse. So the assumption for soil import and export were adjusted the alternative for a.

268 "J. Paul Bruton" (1920325632)

00:36:09.389 --> 00:36:18.269

Based on this newer information alternative for a would modestly reduce the soil handling that would be required as part of the proposed action.

269 "J. Paul Bruton" (1920325632)

00:36:18.269 --> 00:36:21.269

Reducing transportation air quality.

270 "J. Paul Bruton" (1920325632)

00:36:21.269 --> 00:36:26.819

Greenhouse gas impacts, but still not avoiding significant impacts in these topic areas.

271 "J. Paul Bruton" (1920325632)

00:36:26.819 --> 00:36:39.809

Additionally, several sensitive resources and habitats located on the site, including an Eagles nest were not well known at the time that regional parks proposed. The conceptual design that became alternative for a.

272 "J. Paul Bruton" (1920325632)

00:36:39.809 --> 00:36:49.529

After further analysis, it was determined that the proposed design would directly impact the eagles Nest as located on the site.

273 "J. Paul Bruton" (1920325632)

00:36:49.529 --> 00:36:59.279

To avoid impacts on these sensitive resources under alternative for a while still analyzing an alternative that would retain a portion of the pond.

274 "J. Paul Bruton" (1920325632)

00:36:59.279 --> 00:37:05.519

And the central value Protection Board included alternative for B and the.

275 "J. Paul Bruton" (1920325632)

00:37:05.519 --> 00:37:11.699

Alternative for B, illustrate illustrated on the right side of the slide.

276 "J. Paul Bruton" (1920325632)

00:37:11.699 --> 00:37:17.669

Was developed during the use case design process to retain a portion of the pond.

277 "J. Paul Bruton" (1920325632)

00:37:17.669 --> 00:37:27.839

Reduce potential impacts from disturbance on the eagle and create the largest area possible of restored habitat, particularly for sensitive fish species in the remaining area.

278 "J. Paul Bruton" (1920325632)

00:37:27.839 --> 00:37:32.249

Like, alternative for a alternative 4 B would reduce.

279 "J. Paul Bruton" (1920325632)

00:37:32.249 --> 00:37:36.899

The transportation, air, quality, greenhouse, gas emission impacts.

280 "J. Paul Bruton" (1920325632)

00:37:36.899 --> 00:37:41.219

Compared to the proposed action, but would not avoid significant impacts.

281 "J. Paul Bruton" (1920325632)

00:37:41.219 --> 00:37:48.329

American river mitigation sites for a were considered under sequel only in this analysis.

282 "J. Paul Bruton" (1920325632)

00:37:48.329 --> 00:37:54.029

Alternatives for a where rejected from further consideration underneath.

283 "J. Paul Bruton" (1920325632)

00:37:54.029 --> 00:38:02.429

As it was determined that these alternatives would result in the site, not meeting concurrent mitigation requirements for specific habitat types.

284 "J. Paul Bruton" (1920325632)

00:38:02.429 --> 00:38:08.519

Would increase the number of additional mitigation sites needed result in additional land acquisitions.

285 "J. Paul Bruton" (1920325632)

00:38:08.519 --> 00:38:13.680

And result in overall substantial increased costs to fulfill the mitigation requirements.

286 "J. Paul Bruton" (1920325632)

00:38:13.680 --> 00:38:18.540

Both of alternatives for a, and would retain.

287 "J. Paul Bruton" (1920325632)

00:38:18.540 --> 00:38:26.040

A substantial portion of the arms ponds, approximately 20 or 30 acres however, under these alternatives.

288 "J. Paul Bruton" (1920325632)

00:38:26.040 --> 00:38:32.610

The habitat mitigation requirements to address the impacts of the overall project be accommodated on the site.

289 "J. Paul Bruton" (1920325632)

00:38:32.610 --> 00:38:45.270

If alternatives for a, or for B were implemented additional habitat mitigation would need to be constructed elsewhere on the lower American river where opportunities are extremely limited.

290 "J. Paul Bruton" (1920325632)

00:38:45.270 --> 00:38:48.990

Or mitigation credits purchase, which may not be readily available.

291 "J. Paul Bruton" (1920325632)

00:38:52.170 --> 00:39:01.440

The last project component discussed in this is the network is a tool that measures underground water pressure.

292 "J. Paul Bruton" (1920325632)

00:39:01.440 --> 00:39:16.650

And we use it to monitor ground water levels and flow patterns. So this network will be installed after the construction of each project component and it will be located within the 2016 authorized project footprint as you can see outlined in this figure.

293 "J. Paul Bruton" (1920325632)

00:39:16.650 --> 00:39:24.210

The purpose is to collect data to evaluate the long term performance of the Levy improvements, and the flood risk reduction measures.

294 "J. Paul Bruton" (1920325632)

00:39:24.210 --> 00:39:39.870

The image of this parameter is shown on your right to give you an idea of the scale. This actually was taken on a Sacramento river East Levy or swell and was installed by use case.

295 "J. Paul Bruton" (1920325632)

00:39:39.870 --> 00:39:59.870

Now, we will be, There'll be a little bit different, because they will have a solar panel so that the data can be collected and sent remotely to the district. So there will be minor and minor environmental impacts associated with the installation of these. And it does require a drill rate.

296 "J. Paul Bruton" (1920325632)

00:39:59.870 --> 00:40:04.170

To install down to, um, to drill down to the groundwater level.

297 "J. Paul Bruton" (1920325632)

00:40:04.170 --> 00:40:21.120

So there will be noise and visual and, and some recreational impacts associated with the installation and that would be a temporary and minor disruption to maybe, um, people on the bike trail. There would not be full closures. But it may be loud in the area for a day or 2.

298 "J. Paul Bruton" (1920325632)

00:40:21.120 --> 00:40:26.820

Mitigation measures would be implemented to ensure that there is no groundwater contamination.

299 "J. Paul Bruton" (1920325632)

00:40:26.820 --> 00:40:36.270

So, now that we have wrapped up all of the different project components, I did want to discuss cultural resources briefly.

300 "J. Paul Bruton" (1920325632)

00:40:36.270 --> 00:40:56.270

Our cultural resources specialist put together this slide, but could not make it to this presentation today. However, I did want to discuss that usage has identified potential impacts related to cultural, historic archaeological and tribal resources resulting from the project. This process involves completion of a programmatic agreement. With the California historic preservation.

301 "J. Paul Bruton" (1920325632)

00:40:56.270 --> 00:41:06.120

State Historic Preservation officer excuse me or the Shippo each phase of has a uniquely developed process to protect these resources.

302 "J. Paul Bruton" (1920325632)

00:41:06.120 --> 00:41:22.950

Resources have been identified through research site, surveys, ground, testing and consultation with the public and Native American tribes. Additionally we welcome any information from the public regarding via local knowledge, or identification of cultural resources.

303 "J. Paul Bruton" (1920325632)

00:41:26.010 --> 00:41:30.480

So, I wanted to discuss the milestone schedule for this document.

304 "J. Paul Bruton" (1920325632)

00:41:30.480 --> 00:41:50.480

Going back, we started this process October of 2022. we opened up for scoping for public scoping in November of 2022. I wanted to note that comments received during the scoping period are included in an appendix in this and have responses from both. You say.

305 "J. Paul Bruton" (1920325632)

00:41:50.480 --> 00:41:54.570

And the project partners, um, so those are available to review any time.

306 "J. Paul Bruton" (1920325632)

00:41:54.570 --> 00:42:03.840

We released this draft as and, um, just last month December the public comment period is open now and ends February. 5th.

307 "J. Paul Bruton" (1920325632)

00:42:03.840 --> 00:42:10.500

I have outlined just the basic milestones as we use, expect them to come for finalizing this document.

308 "J. Paul Bruton" (1920325632)

00:42:10.500 --> 00:42:28.980

We expect that the Federal Register notification will go out into either August or September of this year with, um, the record of decision being signed and certification occurring in the fall briefly in the movie followed by the delta stewardship council consistency determination.

309 "J. Paul Bruton" (1920325632)

00:42:28.980 --> 00:42:50.400

Next line, so we have outlined the general construction schedule as we anticipate it. Now, of course, this is subject to change based on comments, received our contracting process. How the weather goes all that kind of stuff, but this is as best as we can predict at the time.

310 "J. Paul Bruton" (1920325632)

00:42:50.400 --> 00:43:02.880

Oh, I won't go through too many details but, um, is the project scheduled to just be a single season construction window in 2027?

311 "J. Paul Bruton" (1920325632)

00:43:02.880 --> 00:43:22.880

American river erosion contract 3 B is scheduled to start summer of 2024 and complete in the winter of 2026. American river erosion contract for a, um, is a 2 season window in the summer of 2026 and the winter of 2027 American river contract.

312 "J. Paul Bruton" (1920325632)

00:43:22.880 --> 00:43:28.770

For B is in the very early designs, and we are not sure when that will happen quite yet.

313 "J. Paul Bruton" (1920325632)

00:43:28.770 --> 00:43:36.450

Sacramento river, erosion contract 3 will begin summer 2025. it'll be just a single season and that year.

314 "J. Paul Bruton" (1920325632)

00:43:36.450 --> 00:43:45.690

The mitigation site for the American river will begin in the summer 2025 likely through the end of 2027.

315 "J. Paul Bruton" (1920325632)

00:43:45.690 --> 00:43:56.370

A, or a sacrament or whatever mitigation site is expected to start summer 2025 as well. Ahm and only last 2 seasons until the winter of 2026.

316 "J. Paul Bruton" (1920325632)

00:43:56.370 --> 00:44:07.620

Our pedometer network installation will occur as each project component, um, is completed and so we expect that to go through all the way until the end of 2029.

317 "J. Paul Bruton" (1920325632)

00:44:07.620 --> 00:44:20.310

So you want to know that generally our construction, you know, we begin mobilizing in the spring of the year, but we have to wait until the rain stop to really get going. So, generally the construction starts in the summer.

318 "J. Paul Bruton" (1920325632)

00:44:20.310 --> 00:44:23.610

And it wraps up by the time the, the winter rains come.

319 "J. Paul Bruton" (1920325632)

00:44:23.610 --> 00:44:30.090

So that is all for, um, the.

320 "J. Paul Bruton" (1920325632)

00:44:30.090 --> 00:44:33.240

Here is that the upgrades website?

321 "J. Paul Bruton" (1920325632)

00:44:33.240 --> 00:44:38.400

And Michael, you already found it because you're here and you found the Webex links and everything.

322 "J. Paul Bruton" (1920325632)

00:44:38.400 --> 00:44:44.850

I wanted to point out these red arrows that you can subscribe for instruction update.

323 "J. Paul Bruton" (1920325632)

00:44:44.850 --> 00:45:00.450

So you can get on our email list so, once construction begins, you'll have all that information available to you. There's also, um, a work inquiry, and, um, a concern submission form. So, this is someplace you can go. You can submit something here and we will look into it.

324 "J. Paul Bruton" (1920325632)

00:45:00.450 --> 00:45:10.020

And finally, I have provided, um, the email addresses so that you can submit formal comments.

325 "J. Paul Bruton" (1920325632)

00:45:10.020 --> 00:45:16.650

I've also provided our mailing addresses for both Army Corps of engineers, and the Department of water resources.

326 "J. Paul Bruton" (1920325632)

00:45:16.650 --> 00:45:21.120

We have received comments already, so we are getting them.

327 "J. Paul Bruton" (1920325632)

00:45:21.120 --> 00:45:41.120

We appreciate all of them and we do value your input. We are providing now, at the end of this presentation, a 2 minutes time slot for each participant. So that you can have any clarifications needed. But we do request that you provide written comments. So that they can be fully considered in the final as the.

328 "J. Paul Bruton" (1920325632)

00:45:41.120 --> 00:46:00.450

Thank you so much for attending. Great. Well, keep her part, but be fully. Now, clarify, be fully considered in the final.

329 "J. Paul Bruton" (1920325632)

00:46:00.450 --> 00:46:14.717

Thank you so much for attending.

330 "Keleigh Duey" (1771176192)

00:46:14.717 --> 00:46:20.450

Yeah, Paul, that'd be great if you could leave it up on the screen. So we have a.

331 "Keleigh Duey" (1771176192)

00:46:20.450 --> 00:46:28.470

Those email addresses handy. Um, we also have mailing addresses if someone does want to send something through the mail.

332 "Keleigh Duey" (1771176192)

00:46:28.470 --> 00:46:33.510

We're going to get started with the live portion of this meeting.

333 "Keleigh Duey" (1771176192)

00:46:33.510 --> 00:46:48.276

Can I go ahead and turn my camera on? I am glad that we have the chat back. Um, thank you, Paul for working on that.

334 "J. Paul Bruton" (153558016)

00:46:48.276 --> 00:46:54.074

In the background yeah. Again apologies everybody scrambling.

335 "Keleigh Duey" (1771176192)

00:46:54.074 --> 00:46:59.070

But they are coming in quickly, so I'm, I'm, uh.

336 "Keleigh Duey" (1771176192)

00:46:59.070 --> 00:47:11.430

Where we've got a lot of people in the background tonight, I'm just gonna be the face of the presentation again. Like, last week we have so many people probably, I don't even know 40 or so.

337 "Keleigh Duey" (1771176192)

00:47:11.430 --> 00:47:31.430

Um, people with army corps of engineers, Department of water resources. Um, we probably have people from the board and that are listening on on this presentation and seeing all these comments as they come in. Um, so I just wanted to thank you again for joining. This is the 2nd public meeting for the American.

338 "Keleigh Duey" (1771176192)

00:47:31.430 --> 00:47:37.080

Common features I wanted to.

339 "Keleigh Duey" (1771176192)

00:47:37.080 --> 00:47:48.600

Update you that with changes that have happened since on that public meeting, we have posted the slides. So those are available on sac Levy upgrades dot com.

340 "Keleigh Duey" (1771176192)

00:47:48.600 --> 00:48:08.600

And then we've also posted that presentation, um, from last week, um, with a live recording, um, and that can be found under the public engagement section of upgrades once again. Um, Paul is recording this presentation.

341 "Keleigh Duey" (1771176192)

00:48:08.600 --> 00:48:28.600

So will be capturing all of this, um, verbal participation, um, from the public? Um, I did want to note that yeah, we have received several comments about quality of the figures, um, in this presentation. Um, we encourage you to download the documents to get your computer.

342 "Keleigh Duey" (1771176192)

00:48:28.600 --> 00:48:45.360

There is a table of contents that is linked, so you can just click on a figure if you're looking for American river mitigation site figure click on it takes right to the page. You can blow it up on your screen a much better. Um, I agree. I need some new glasses myself, so that's what I'm going to be doing.

343 "Keleigh Duey" (1771176192)

00:48:45.360 --> 00:48:50.100

Um, we have been receiving a live your comments via email.

344 "Keleigh Duey" (1771176192)

00:48:50.100 --> 00:48:54.150

Um, everything in the chat will also be recorded tonight.

345 "Keleigh Duey" (1771176192)

00:48:54.150 --> 00:49:01.290

Um, when we receive an email, we are sending out an automatic response so that, you know, it was received.

346 "Keleigh Duey" (1771176192)

00:49:01.290 --> 00:49:04.290

Some of the comments have been.

347 "Keleigh Duey" (1771176192)

00:49:04.290 --> 00:49:12.660

Quite technical in nature as I can see, they're already starting, which is great. Um.

348 "Keleigh Duey" (1771176192)

00:49:12.660 --> 00:49:21.450

I did want to note that we have been getting a lot of comments regarding the extension of a public comment, period. Um, that decision.

349 "Keleigh Duey" (1771176192)

00:49:21.450 --> 00:49:40.410

Is elevated to leadership at this time. Um, and we are hoping to have a decision next week that decision will be posted on the upgrades and as required underneath regulations. Um, a public notice will occur if the extension is granted.

350 "Keleigh Duey" (1771176192)

00:49:40.410 --> 00:49:48.300

We've also received and I can see them in the chat tonight comments regarding an in person public meeting.

351 "Keleigh Duey" (1771176192)

00:49:48.300 --> 00:50:08.300

That was quite a surprise for us. We've been offering virtual public meetings since the pandemic. Um, and we've actually had such great success. We've had so many more people able to join. Um, so, um, I'm, I'm glad to hear that. That is an option.

352 "Keleigh Duey" (1771176192)

00:50:08.300 --> 00:50:14.070

And that you are interested in, and we are considering that for future public outreach.

353 "Keleigh Duey" (1771176192)

00:50:14.070 --> 00:50:21.360

I wanted to tell you the plan for tonight, um, similar to Wednesday.

354 "Keleigh Duey" (1771176192)

00:50:21.360 --> 00:50:24.810

We are all going to be here listening.

355 "Keleigh Duey" (1771176192)

00:50:24.810 --> 00:50:30.750

Um, but we are not responding to these verbal comments tonight. Um.

356 "Keleigh Duey" (1771176192)

00:50:30.750 --> 00:50:48.030

Let's see, so that, you know, the decision for that is, we don't have a lot of time. I'm already feeling pressured, right? At 6:30: We want to hear everyone. We're already running behind. Um, so we want everyone to be able to speak. Um.

357 "Keleigh Duey" (1771176192)

00:50:48.030 --> 00:50:53.994

We are already in the process of comment response. However.

358 "J. Paul Bruton" (1920325632)

00:50:53.994 --> 00:50:56.436

So, everything that we've received so far.

359 "Keleigh Duey" (1771176192)

00:50:56.436 --> 00:51:08.030

It's already being categorized, it's being logged, it's being tracked. Um, and it's being assigned to a subject matter expert whoever that may be um, this ensures that we have a clear.

360 "Keleigh Duey" (1771176192)

00:51:08.030 --> 00:51:11.190

A response from the Army Corps of engineers.

361 "Keleigh Duey" (1771176192)

00:51:11.190 --> 00:51:22.920

The board, and they've got all the project components need to have a say, it can't just come out of my mouth. Okay. Um, I wish that I could, um.

362 "Keleigh Duey" (1771176192)

00:51:22.920 --> 00:51:33.390

And then each of those responses goes through a, um, a very thorough and multiple cycles of quality control and review.

363 "Keleigh Duey" (1771176192)

00:51:33.390 --> 00:51:53.390

That being said we acknowledge tonight, we acknowledge all the other comments that there may be substantive comments that we receive that will require changes or additions to this draft document. Any of those changes will be incorporated into the final and.

364 "Keleigh Duey" (1771176192)

00:51:53.390 --> 00:52:13.390

Noticing we'll go out for that when that happens, and there will be a very large appendix, hundreds of pages with every comment that we've received, um, with a response. Um, and all the public will be noticed when that final is released, um, any changes that resulted from comments.

365 "Keleigh Duey" (1771176192)

00:52:13.390 --> 00:52:17.190

Be included that in not appendix as well.

366 "Keleigh Duey" (1771176192)

00:52:17.190 --> 00:52:30.360

So, as for the public participation portion of this evening, each participant will be offered 2 minutes. Um, you will use the raise hand icon at the bottom.

367 "Keleigh Duey" (1771176192)

00:52:30.360 --> 00:52:34.020

Um, I will send you a request to unmute.

368 "Keleigh Duey" (1771176192)

00:52:34.020 --> 00:52:39.780

And I will go in the order of the IC on my screen. It might look a little different to, you.

369 "Keleigh Duey" (1771176192)

00:52:39.780 --> 00:52:59.780

But do not worry, we will get to you we got to everyone, um, last week, I do want to ask that, um, if you attended last week, if you could hold your comments until the very end, we'd like to hear from any new people that joined. We do have more people here tonight.

370 "Keleigh Duey" (1771176192)

00:52:59.780 --> 00:53:19.780

We did last week, um, and if you could try to reduce kind of redundant comments in the chat, um, we'd like to see, um, you know, all those new comments. Um, I know some of this is, you know, you want to talk to other people in the chat who are on the meeting and I understand that. Um, it does it does help us.

371 "Keleigh Duey" (1771176192)

00:53:19.780 --> 00:53:36.420

Insulting comments and responding to you better if, if we can reduce some of those redundancies. So that all being said, I would like to begin. So, if you would like to participate, um, please raise your hand.

372 "Keleigh Duey" (1771176192)

00:53:36.420 --> 00:53:45.660

And we will get started I see some of you or are back again.

373 "Keleigh Duey" (1771176192)

00:53:45.660 --> 00:53:55.460

Uh, okay, we're gonna start with Pete Spaulding. I'm gonna send you a request on mute.

374 "Pete Spaulding" (1927767296)

00:54:00.736 --> 00:54:15.480

Okay, thanks, Kelly. And we hope we appreciate your efforts and sure hope you're getting comp time for sticking around and running these meetings. I know. You just said the request for an in person meeting.

375 "Pete Spaulding" (1927767296)

00:54:15.480 --> 00:54:23.520

1 Are coming in loud and clear um, I think that should be a joint meeting from you guys.

376 "Pete Spaulding" (1927767296)

00:54:23.520 --> 00:54:28.050

And a central valley flood, controlled Protection board, you guys all have a stake in this.

377 "Pete Spaulding" (1927767296)

00:54:28.050 --> 00:54:35.730

And you all are responsible for flood control and erosion control. So I hope your leadership listens.

378 "Pete Spaulding" (1927767296)

00:54:35.730 --> 00:54:55.730

2 Um, the maps and diagrams, like you said, I've I've downloaded them to my computer. I blow them up. You still can't see the detail that you need, in order to comment properly on, uh, on this project. And this is a repeat from what I said last week right now, we have flood protection.

379 "Pete Spaulding" (1927767296)

00:54:55.730 --> 00:55:15.730

3 From the flow of 160,000 cubic feet per 2nd, when this project is done, we're going to have protection for 160,000 cubic feet per. 2nd if this project is not done, we're still going to have protection from 160,000 cubic feet per 2nd. So, we're not getting an extra protection instead. We're losing a lot of.

380 "Pete Spaulding" (1927767296)

00:55:15.730 --> 00:55:27.420

Of the repairing vegetation that is providing erosion contract protection. Like, it has for all these years. And this is not an emergency contract. Let's take a breath.

381 "Pete Spaulding" (1927767296)

00:55:27.420 --> 00:55:38.220

You know, listen to everybody that's making comments. Give people an extra extra time to comment. Give you guys extra time to respond to those comments.

4 382 "Pete Spaulding" (1927767296)

00:55:38.220 --> 00:55:58.220

And and and do that, and come up with an alternative design that can provide protection without devastation. If this project continues as planned, especially for all I can say, is the blood of the American river Parkway is going to be on your hands forever.

383 "Pete Spaulding" (1927767296)

00:55:58.220 --> 00:56:04.710

My name is Pete. Spaulding. I'm the volunteer steward for the American river Parkway. My 11 s.

384 "Pete Spaulding" (1927767296)

00:56:04.710 --> 00:56:11.876

I live on Rio Bravo circle and have been here since July and 94. thanks for listening.

385 "Keleigh Duey" (1771176192)

00:56:11.876 --> 00:56:25.110

Thanks Pete, I think yeah, I think we will try to take a deeper dive into those figures. Maybe we can produce a separate appendix that we can get up on the website. Um.

386 "Keleigh Duey" (1771176192)

00:56:25.110 --> 00:56:33.150

So, yeah, I, I hear everything else that you're saying, but I did want to make a note of those figures. Um.

387 "Keleigh Duey" (1771176192)

00:56:33.150 --> 00:56:44.640

Don't worry I am taking notes. I do better. My brain works better when I, when I write, I'm writing everyone's names. I'm writing things that stand out to me. Um.

388 "Keleigh Duey" (1771176192)

00:56:44.640 --> 00:56:52.500

But do not worry. We have a lot of people taking notes in the background and we have, um, we will be transcribing all of this as well.

389 "Keleigh Duey" (1771176192)

00:56:52.500 --> 00:56:59.178

All right Daniel alola.

390 "Daniel Airola" (1076124160)

00:56:59.178 --> 00:57:19.250

Hola, Hi there I did speak last time, so I'm going to be very brief and just touch on a couple of issues that I didn't mention last time. Um, 1st of all, I think that if not just an in person meeting, but a field meeting would be valuable.

391 "Daniel Airola" (1076124160)

00:57:19.250 --> 00:57:39.710

We really need to understand and have communication back and forth as to what this project is really going to look like there's existing protection out there within these reaches. That has been put in place. That actually looks very good to me. I don't know whether what you're going to produce is similar to.

392 "Daniel Airola" (1076124160)

00:57:39.710 --> 00:57:49.020

Were different from that, but I can't get an answer because, you know, we can't have a discussion about it. I find that very frustrating.

393 "Daniel Airola" (1076124160)
00:57:49.020 --> 00:58:03.780

Another point that I want to make is there's no alternatives in terms of the types of erosion control measures that are being prescribed. It's kind of, you know, either we don't do it or we.

6 394 "Daniel Airola" (1076124160)
00:58:03.780 --> 00:58:23.780

Or we do it, and I think we really, considering the value of the resources here, we really need to look more at the design different designs and what level of flood protection and habitat protection they convey. Lastly, I would just predict that in particular.

395 "Daniel Airola" (1076124160)
00:58:23.780 --> 00:58:43.780

7 If the comment, period is not extended, I think that the document is probably going to have to be re, issued because, you know, there are so many issues with the environmental analysis, and the project itself that responding to those comments and putting them into the final.

396 "Daniel Airola" (1076124160)
00:58:43.780 --> 00:58:59.556

Is going to be so different from the draft that the public deserves an opportunity to respond to the changes in the final before it is certified. So I believe it at that. And I, thank you for your time and your patients with us and.

397 "Keleigh Duey" (1771176192)
00:58:59.556 --> 00:59:08.100
Thanks Dan aliza Morris.

398 "Eliza J. Morris" (666889728)
00:59:11.335 --> 00:59:20.216

Hi, thank you. Um, I actually got to go last time so if there's other people that want to go before me, I don't know what order are you just.

399 "Keleigh Duey" (1771176192)
00:59:20.216 --> 00:59:23.136
Calling people, um, it shows up on.

400 "Eliza J. Morris" (666889728)
00:59:23.136 --> 00:59:31.710

An order on my screen. Okay. That's fine. I'll go ahead. Um, okay, so I had a few points that I came up since last time.

401 "Eliza J. Morris" (666889728)
00:59:31.710 --> 00:59:46.856

1st of all, I found a lower American river separates to summary of bank protection, conceptual design process document for the stuff over by sack state. It was amazing. It had, like, stretched by stretch.

8 402 "J. Paul Bruton" (1920325632)

00:59:46.856 --> 00:59:48.198

Uh, what the soil.

403 "Eliza J. Morris" (666889728)

00:59:48.198 --> 00:59:50.695

Was what the flow rates in the river all the.

404 "J. Paul Bruton" (1920325632)

00:59:50.695 --> 00:59:54.079

Details of the technical details that you'd want to look at.

405 "Eliza J. Morris" (666889728)

00:59:54.079 --> 00:59:58.860

I'm hoping that exists for ours and you guys can tell us where to find it.

406 "Eliza J. Morris" (666889728)

00:59:58.860 --> 01:00:18.860

Also, I'm hoping for more information about I know a lot of people are asking about the trees on the Levy and the trees along the edges and what's going to happen to all the trees. But I'm actually concerned about the ones in larchmont park. So that's our neighborhood park, and the ones that are over at the top edge of the staging area, by the.

407 "Eliza J. Morris" (666889728)

01:00:18.860 --> 01:00:38.860

It was unclear if they were marked for removal or what the plan is for those ones, but they're really important to our part. So I wanted to check on those and also the play structure in the park. I'm sure you guys know is really, really close to your staging area. So, is there a plan to build a new 1 further down the park? So that people.

408 "Eliza J. Morris" (666889728)

01:00:38.860 --> 01:01:00.650

Kids can still play also. I, after I told you, I know you probably remember the biking, because I biking to work. I actually asked around a little bit and it turns out we have a lot of students living in the area, and it's not just me as an employee, but we also have a lot of students who use that bike path to commute as well. So, I'm really hoping for.

409 "Eliza J. Morris" (666889728)

01:01:00.650 --> 01:01:15.570

Some information on what our alternate buy group can look like and then my final 1 was oh, yes, I was looking through all of your guys's mitigation notes. I noticed that it says that the trucks will always be covered.

410 "Eliza J. Morris" (666889728)

01:01:15.570 --> 01:01:35.570

If they're going on major roads and I wanted to make sure that our roads are considered major roads and so they will be covered to reduce the dust exposure in our neighborhood. And then also, it said that they were going to be hosed down every hour in order to limit the dust but talking with people over at the.

411 "Eliza J. Morris" (666889728)

01:01:35.570 --> 01:01:40.290

State site it sounds like that did not happen there. And there just exposure was.

412 "Eliza J. Morris" (666889728)
01:01:40.290 --> 01:01:47.070

Substantially higher than what the documents indicate they should be. So, I just wanted to check double check.

413 "Eliza J. Morris" (666889728)
01:01:47.070 --> 01:01:51.819

On the plans for hosing down everything throughout the process and that's everything. Thank you.

414 "Keleigh Duey" (1771176192)
01:01:51.819 --> 01:01:58.650
Thank you bill.

415 "Bill Brattain" (1551186944)
01:02:02.538 --> 01:02:09.480

Hi, yeah. Hi, this is Bill. Brighton. Um, yeah, I wanted a 2nd, um.

416 "Bill Brattain" (1551186944)
01:02:09.480 --> 01:02:16.380

The calls for a public meeting, and I wanted to suggest that back in 2004 when the Army Corps.

417 "Bill Brattain" (1551186944)
01:02:16.380 --> 01:02:20.790

Height and the Levy and put in a deeper clay core.

418 "Bill Brattain" (1551186944)
01:02:20.790 --> 01:02:24.600

13

North East of the major drain we had a.

419 "Bill Brattain" (1551186944)
01:02:24.600 --> 01:02:31.320

Public meeting at their early wine, elementary school, which is right next to the large ball park and I had a.

420 "Bill Brattain" (1551186944)
01:02:31.320 --> 01:02:35.400

Gymnasium there that was plenty big for a whole bunch of people.

421 "Bill Brattain" (1551186944)
01:02:35.400 --> 01:02:41.070

And I was thinking if we could schedule the meeting earlier in the day, and maybe even on a weekend.

422 "Bill Brattain" (1551186944)
01:02:41.070 --> 01:02:48.060

There would be time to go out and actually walk along the Levy next to the large mount park and observe.

423 "Bill Brattain" (1551186944)
01:02:48.060 --> 01:02:51.180

Where the trees are so that army corps can.

424 "Bill Brattain" (1551186944)

01:02:51.180 --> 01:02:56.100

Can tell us which trees they expect would be removed because right now we're.

425 "Bill Brattain" (1551186944)

01:02:56.100 --> 01:03:06.540

Were basically speculating on where these, what trees are being removed there's all these heritage jokes. Some are fairly close to the Levy. Some are more distant.

426 "Bill Brattain" (1551186944)

01:03:06.540 --> 01:03:10.170

But I took measurements of those books this morning. The circumference.

427 "Bill Brattain" (1551186944)

01:03:10.170 --> 01:03:19.230

1 of them was 16 and a half feet in diameter, which corresponds with a 315 year old.

428 "Bill Brattain" (1551186944)

01:03:19.230 --> 01:03:22.500

Oak tree and then the others were up to.

429 "Bill Brattain" (1551186944)

01:03:22.500 --> 01:03:27.540

Well, there was a 250 year old 1 and a 275 year old 1.

430 "Bill Brattain" (1551186944)

01:03:27.540 --> 01:03:30.660

And then down along the shoreline to.

431 "Bill Brattain" (1551186944)

01:03:30.660 --> 01:03:35.640

It's not clear how, how far back are the trees going to be removed?

432 "Bill Brattain" (1551186944)

01:03:35.640 --> 01:03:38.910

And, um, you know, right now.

433 "Bill Brattain" (1551186944)

01:03:38.910 --> 01:03:41.910

The way it is.

434 "Bill Brattain" (1551186944)

01:03:41.910 --> 01:03:49.800

Basically, we have to assume all the trees are being removed all the way from the.

435 "Bill Brattain" (1551186944)

01:03:49.800 --> 01:03:57.030

Levee all the way down to the water line. That's what was done at Sacramento state and now that's a complete barren moon escape.

436 "Bill Brattain" (1551186944)

01:03:57.030 --> 01:04:05.250

With no trees, no grass, the erosion. I don't know why that's even being called erosion control work, because it's loose soil.

437 "Bill Brattain" (1551186944)

01:04:05.250 --> 01:04:09.960

And the plantings along the shoreline and look dead to me, I'm looking at it on my.

14

438 "Bill Brattain" (1551186944)

01:04:09.960 --> 01:04:15.000

Tv screen right now from the news cast today, this CBS News.

439 "Bill Brattain" (1551186944)

01:04:15.000 --> 01:04:19.500

To show the sack state, it's just a complete.

440 "Bill Brattain" (1551186944)

01:04:19.500 --> 01:04:27.750

So, anyway, um, once again, I wanted to suggest early line, uh, elementary, next to the large ballpark.

441 "Bill Brattain" (1551186944)

01:04:27.750 --> 01:04:32.910

And to combine it with a field trip, so we can go out and see.

442 "Bill Brattain" (1551186944)

01:04:32.910 --> 01:04:38.658

You know, what's which trees are being removed? Because we, we just don't know.

443 "Keleigh Duey" (1771176192)

01:04:38.658 --> 01:04:47.714

Thank you bill, I'm going to go to Daniel. Kay.

444 "Daniel Kay" (1617177088)

01:04:47.714 --> 01:05:09.710

Hello, my name's Danny. K, and I did not speak last time. I'm kind of concerned about the 2 legged humans that live around this area. I have a question about I think it's I really can't tell by the maps. I live on waterton way and my backyard.

15

445 "Daniel Kay" (1617177088)

01:05:09.710 --> 01:05:19.350

Is butts up against a surge protection from the flood zone or something?

446 "Daniel Kay" (1617177088)

01:05:19.350 --> 01:05:27.510

Technical, however, I'm just curious if that is going to be used as a staging zone. Are we going to have heavy equipment? Just.

447 "Daniel Kay" (1617177088)

01:05:27.510 --> 01:05:41.850

Inches away from my back fence there's about 25 houses. That's my main question. I'm just concerned about me and my neighbors and thank you for doing all the hard work. Everybody and all our experts on on both sides of this. Um.

448 "Daniel Kay" (1617177088)

01:05:41.850 --> 01:05:50.654

I need all of you clearly. So thank you. Uh, that's it. I look forward to not having tractors in my backyard.

449 "Keleigh Duey" (1771176192)

01:05:50.654 --> 01:05:52.057

Okay.

450 "Daniel Kay" (1617177088)

01:05:52.057 --> 01:05:53.796

Thanks Danny.

451 "Keleigh Duey" (1771176192)

01:05:53.796 --> 01:06:11.250

Matt Matt car are you there?

452 "J. Paul Bruton" (153558016)

01:06:19.819 --> 01:06:26.250

Sorry, I think I can you try it know that.

453 "J. Paul Bruton" (153558016)

01:06:38.670 --> 01:06:41.670

I think I unmuted you are you speaking.

454 "J. Paul Bruton" (153558016)

01:06:48.900 --> 01:06:55.950

Hmm.

455 "J. Paul Bruton" (153558016)

01:07:06.060 --> 01:07:09.797

Can you send him an invite to unmute? Because I.

456 "Bailey Hunter" (1289876992)

01:07:09.797 --> 01:07:13.200

I mean, Matt.

457 "Bailey Hunter" (1289876992)

01:07:13.200 --> 01:07:16.950

It looks like he's already unmuted or maybe he's on there twice.

458 "Bailey Hunter" (1289876992)

01:07:16.950 --> 01:07:32.859

Let me.

459 "Keleigh Duey" (1771176192)

01:07:32.859 --> 01:07:36.950

We won't forget you, Matt. It's okay.

460 "Keleigh Duey" (1771176192)

01:07:36.950 --> 01:07:43.470

You can raise your hand it will be easier for us to find you in the chat.

461 "Keleigh Duey" (1771176192)

01:07:43.470 --> 01:07:48.660

Or, I mean, at the participant list where we unmute everyone, so if you can, like, raise your hand again.

462 "Keleigh Duey" (1771176192)

01:07:58.110 --> 01:08:01.221

Okay.

463 "J. Paul Bruton" (153558016)

01:08:01.221 --> 01:08:05.340

Well, why don't you go ahead and, uh.

464 "J. Paul Bruton" (153558016)

01:08:05.340 --> 01:08:09.498

Answer someone else right now I'll see if I can bring me to.

465 "Keleigh Duey" (1771176192)

01:08:09.498 --> 01:08:14.850

Okay, the next person is Andre. Wiley.

466 "Keleigh Duey" (1771176192)

01:08:24.990 --> 01:08:29.340

So a request has been set and you'll check the box so you can be unmuted.

467 "Keleigh Duey" (1771176192)

01:08:29.340 --> 01:08:36.618

Andrea Wiley. Willie. Okay. Am I unmuted?

468 "Andrea Willey, MD" (2046977024)

01:08:36.618 --> 01:08:56.840

I can hear you now. I well, thank you for the opportunity to speak. I did attend last meeting and I didn't speak about time as I think I'll put my comments in writing, but I do want to just speak up and say, I'm a native of Sacramento. Am born lived through my entire life. I live on the levy on my old 10, which has been identified as the critical.

469 "Andrea Willey, MD" (2046977024)

01:08:56.840 --> 01:09:16.840

And I'm concerned about flood control as much as to anyone I'm also a physician with a long background in veterinary medicine. And I've spent the last 5 months studying the waterbirds in the habitat along mile 11 north of the American river. And I have witnessed the complete devastation of the water bird and wildlife habitat downstream near the call.

470 "Andrea Willey, MD" (2046977024)

01:09:16.840 --> 01:09:36.840

College campus that has completely destroyed the habitat and displaced countless numbers of birds, waterbirds and wildlife. The efforts of the Army Corps of engineers to preserve. The repairing habitat has been fully inadequate. And the planned mitigation is in no way adequate. It doesn't provide enough shelter or protection for these.

471 "Andrea Willey, MD" (2046977024)

01:09:36.840 --> 01:09:56.840

Animals the concept of destroying miles of river habitat and replacing it with a single area. 2 years later is simply flawed. Further action of the Army Corps in this area would devastate the wildlife and likely be permanent and simply acknowledging the loss of habitat and is not.

472 "Andrea Willey, MD" (2046977024)

01:09:56.840 --> 01:10:12.900

Enough, it's like taking all the people in an old neighborhood, and putting all the families in a parking lot and expecting them to thrive. I just urge you to suspend this project so that you can create a targeted approach that will not destroy the habitat in this rare and scenic river.

473 "Keleigh Duey" (1771176192)

01:10:12.900 --> 01:10:23.417

Thank you for your comment. I will go next to Don.

474 "Dom" (2643824384)

01:10:23.417 --> 01:10:37.320

Yeah, can you hear me? Yeah. Yeah. Uh, so, 1 of the things that really concerned me was the talk of removing these heritage trees and the increased water temperature.

475 "Dom" (2643824384)

01:10:37.320 --> 01:10:42.120

I'm sure you're aware of how dire the salmon fishery is.

476 "Dom" (2643824384)

01:10:42.120 --> 01:10:51.720

And so, every little bit of habitat matters at this point, since it's in such terrible shape and the idea that where they're rearing.

17

477 "Dom" (2643824384)

01:10:51.720 --> 01:11:02.490

They're young would have increased tabs when we're already looking at increased temps, going into the future with climate change. And your own pictures that you showed us to the recovery is like a 15 year timeframe.

478 "Dom" (2643824384)

01:11:02.490 --> 01:11:10.860

So, what what are we supposed to do during that time? And I, people have already said this, but from the looks terrible.

479 "Dom" (2643824384)

01:11:10.860 --> 01:11:30.150

And I get the long term goal, and, you know, I appreciate what you're doing for safety in this area. But, um, what about the water temperature for that entire stretch? Is it not going to be increased? I'm hoping that that has been studied and if not, I urge you to study the water temperature effect on salmon.

480 "Dom" (2643824384)

01:11:30.150 --> 01:11:48.630

Um, and then if you could kind of explain more why you're not doing barges, because the, um, excavators, I had a huge impact. And then I just want to say that, like, yes, there's these people who live right next to the river, but they're not the only people who are using the American river bike trail. Right? I live in Alhambra triangle.

481 "Dom" (2643824384)

01:11:48.630 --> 01:11:54.420

And I use that stretch to the bike trail all the time, and people all over the Sacramento region, use this.

482 "Dom" (2643824384)

01:11:54.420 --> 01:12:02.940

And then, um, the other thing I wanted to talk about is biking safety with this bike path. I really hope you're not going to put the alternate path.

483 "Dom" (2643824384)

01:12:02.940 --> 01:12:06.980

On some public roadway, because the American river bike trail is pretty much the only.

484 "J. Paul Bruton" (1920325632)

01:12:06.980 --> 01:12:10.939

Safe bike path we have in this region and as mentioned before.

485 "Dom" (2643824384)

01:12:10.939 --> 01:12:19.920

A lot of people use that for commuting myself included and so people out on the major roadways would not be an adequate solution.

486 "Dom" (2643824384)

01:12:19.920 --> 01:12:34.435

And then, let me look through my list of things I wanted to say. Yeah. And then, lastly, I just want to reiterate that I really hope you're effectively reaching out to tribes and not just tribe that are in this region, but tribes that have a spiritual connection. Um.

487 "J. Paul Bruton" (1920325632)

01:12:34.435 --> 01:12:36.461

Thank you for your time and your work.

488 "Keleigh Duey" (1771176192)

01:12:36.461 --> 01:12:45.840

Thank you don. Um, Nancy.

489 "Keleigh Duey" (1771176192)

01:13:02.100 --> 01:13:06.278

Nancy, and I sent you the request. I know we heard from, you.

490 "Nancy Kniskern" (2425283328)

01:13:06.278 --> 01:13:25.190

Last week, I know I'm a slow learner. Thanks so much. Um, I understand the 45 day review, period is by law, and it doesn't really get adjusted for the amount of paperwork you're looking at and I want to be sure.

Everybody knows the volume of what we are supposed to know here. This report that we're looking at is 900.

491 "Nancy Kniskern" (2425283328)

01:13:25.190 --> 01:13:37.800

48 is 840 pages. That's 1780 pages and 45 days you average to have to reading.

492 "Nancy Kniskern" (2425283328)

01:13:37.800 --> 01:13:57.800

40 technical pages a day if you take 10 days off, let's say, for Christmas and for weekends, that would bring you to 50 pages a day. Now, if you want the history of the project, where you have to go to get some of the mitigation, especially for habitat, then you're looking at another report, a 459 pages with 13 appendices.

493 "Nancy Kniskern" (2425283328)

01:13:57.800 --> 01:14:17.800

Have 1962 pages bringing you to 202,451 pages divided by 45 days. That's 53 pages. 53+the original 40 is 90 pages a day. I think that's incredible. If you expect anybody to even read that and I'm not talking about understanding it. I'm just talking about playing.

494 "Nancy Kniskern" (2425283328)

01:14:17.800 --> 01:14:26.310

Reading, and I think this is way too short at time. And again, I just want to be like those other people encouraging. Please.

495 "Nancy Kniskern" (2425283328)

01:14:26.310 --> 01:14:29.820

To give us an extension just so we can get through the paperwork.

496 "Nancy Kniskern" (2425283328)

01:14:29.820 --> 01:14:42.660

The other thing is, I think it's very difficult for us. We don't have to read every page, but because the projects we're all lumped together in 1 report, it was very hard to sift out. What project.

22

497 "Nancy Kniskern" (2425283328)

01:14:42.660 --> 01:14:51.720

It applies to you and where are those pages that apply to you? So, I think next time I would hope that you would have different sections for different projects.

498 "Nancy Kniskern" (2425283328)

01:14:51.720 --> 01:15:11.720

It's difficult to understand and not all all acronyms are included in the front. So, I'm just guessing at what you mean to say here. 1 section. I look at is the executive summary page. 4. it's talking about the environmental resource categories, transportation, and they talk about trucks and they talk about. Will this also include.

499 "Nancy Kniskern" (2425283328)

01:15:11.720 --> 01:15:18.180

23

The 1st phase includes adding 50 or more new truck trips during am or PM peak hours.

500 "Nancy Kniskern" (2425283328)

01:15:18.180 --> 01:15:24.870

And How's that going to be addressed with some of these acronyms? I don't understand the sequence significant.

501 "Nancy Kniskern" (2425283328)

01:15:24.870 --> 01:15:30.360

Conclusion is the same as the this finding is significant, and it's unavoidable.

502 "Nancy Kniskern" (2425283328)

01:15:30.360 --> 01:15:38.160

These trucks, okay, that doesn't answer any questions for me. And I'd like to have some form to talk about that.

503 "Nancy Kniskern" (2425283328)

01:15:38.160 --> 01:15:42.180

Um, to be fair to the public.

504 "Nancy Kniskern" (2425283328)

01:15:42.180 --> 01:15:48.150

Give us the extension. I already said that I'm sorry please provide meetings that's been asked for me.

505 "Nancy Kniskern" (2425283328)

01:15:48.150 --> 01:15:54.240

I want to point out that in your appendix burnt appendix. There is a.

506 "Nancy Kniskern" (2425283328)

01:15:54.240 --> 01:15:58.620

24 Portion called chapter 4 are calling future public involvement.

507 "Nancy Kniskern" (2425283328)

01:15:58.620 --> 01:16:16.350

And it says here you says, also plans on opportunities for public awareness, involvement, participation, including website, updates and formal and informal meetings with interested members of the public community groups and individuals as requested. So we are requesting that. Thank you very much. Um.

508 "Nancy Kniskern" (2425283328)

01:16:16.350 --> 01:16:28.440

Nature provides a lot of erosion possibilities that we think are going to be ruined because of this construction. But I want to ask for 2 things and 1 of those was the extension and the other 1 is I would like to invite.

509 "Nancy Kniskern" (2425283328)

01:16:28.440 --> 01:16:41.010

The core members to the park to look at the Parkway in the bicyclists on it to come with us at any week. And we set we set up pop ups to talk with the public come with us.

25 510 "Nancy Kniskern" (2425283328)

01:16:41.010 --> 01:16:44.400

Learn what these people are saying, and what they're concerned about.

511 "Nancy Kniskern" (2425283328)

01:16:44.400 --> 01:16:57.660

Um, also we have a beautiful aquatic center supported by North of Tomas dam, and they provide all kinds of water sports that they will teach you again. We, we.

512 "Nancy Kniskern" (2425283328)

01:16:57.660 --> 01:17:17.567

Get lessons there and we come down to the river and we use them canoeing, kayaking, paddleboarding, sailing and it's just a wonderful, wonderful event. So, we would like to invite people who are not familiar with the river and are part of this project to come and see what it's about. Person to person. Thank you very much. Thank you. Nancy.

513 "Keleigh Duey" (1771176192)

01:17:17.567 --> 01:17:21.930

I'm going to go to a.

514 "Keleigh Duey" (1771176192)

01:17:21.930 --> 01:17:26.106

Her whole Jensen we heard from you last week as well.

515 "Mikkel Herholdt Jensen" (848738304)

01:17:26.106 --> 01:17:38.880

Yes, hi so I was here last week in the meanwhile I had some time to look through some of the technical reports and some of the information that's out there.

516 "Mikkel Herholdt Jensen" (848738304)

01:17:38.880 --> 01:17:47.490

And so I want to make a couple of points that I didn't make last time based on reading these reports. My impression is that the project 3 P is.

517 "Mikkel Herholdt Jensen" (848738304)

01:17:47.490 --> 01:17:50.490

Uh, disruptive to the area it's excessive.

518 "Mikkel Herholdt Jensen" (848738304)

01:17:50.490 --> 01:17:59.280

I and disastrously detrimental to the neighborhood, and it doesn't seem in line with the recommendations from reports made just a few year previous.

519 "Mikkel Herholdt Jensen" (848738304)

01:17:59.280 --> 01:18:15.810

In fact, the previous reports and peer reviews, vastly offer vastly different measurements that are not as destructive and detrimental to the neighborhood. In the interest of time. I want to just draw attention to 1 report the 2017 lower American rivers stream bank, erosion, monitoring report.

520 "Mikkel Herholdt Jensen" (848738304)

01:18:15.810 --> 01:18:21.000

Um, this report models flows at 145,000 cubic feet a 2nd, which is.

521 "Mikkel Herholdt Jensen" (848738304)

01:18:21.000 --> 01:18:28.980

Um, what they said is the female base flood flow, and they note that the, if you look at their panels that the of the model flow.

522 "Mikkel Herholdt Jensen" (848738304)

01:18:28.980 --> 01:18:43.080

The flow in the channels in most places is moderate, and certainly near the banks is less than 70 per. 2nd they also note that sales with vegetative copper can support 6 to 7 fee per 2nd flow and the main channel velocity.

523 "Mikkel Herholdt Jensen" (848738304)

01:18:43.080 --> 01:18:51.270

And they go on to say at the lower American river river mile 9.8 which is right around the areas we be for projects.

524 "Mikkel Herholdt Jensen" (848738304)

01:18:51.270 --> 01:18:55.710

They say that the planting that they've done there appears to have reduced the rate of erosion.

525 "Mikkel Herholdt Jensen" (848738304)

01:18:55.710 --> 01:19:03.540

And it has not progressed significantly on page. 10 of that report for river mile. 10.5 which is right around large 1 part that I believe.

526 "Mikkel Herholdt Jensen" (848738304)

01:19:03.540 --> 01:19:13.380

They say the upstream portion of the site has not integrated significantly, and they recommend for erosion control. They recommend.

527 "Mikkel Herholdt Jensen" (848738304)

01:19:13.380 --> 01:19:17.520

Cobbles with vegetation or other bio technical measures.

528 "Mikkel Herholdt Jensen" (848738304)

01:19:17.520 --> 01:19:26.004

And they do not mention what is currently in project. So their recommendation in practice is totally at odds with this previous reports. Just a few.

529 "" (0)

01:19:26.000 --> 01:19:32.810

Earlier, and I think the U s, Army Corps of engineers should really thoroughly address why these measured laid out just a few years earlier.

530 "" (0)

01:19:32.810 --> 01:19:40.129

Are insufficient all of a sudden, um, for this stretch of the river so I think that needs to be thoroughly addressed.

531 "" (0)

01:19:40.129 --> 01:19:45.259

Um, the other point I want to make is that the current projects we be in a current form.

532 "" (0)

01:19:45.259 --> 01:19:48.410

Does not adequately accommodate recreational use of the river.

533 "" (0)

01:19:48.410 --> 01:19:57.380

And again, it goes against previous recommendations siding again the 2017 report, they say on page 10 of the report repair of the site.

534 "" (0)

01:19:57.380 --> 01:20:05.750

We'll need to integrate recreational use, which is currently not captured in projects. We B, the current project to disrupt the use of the river for 3 years.

535 "" (0)

01:20:05.750 --> 01:20:13.550

It will include many more years to be growing before the veteran's vegetation will resemble anything near the usable state for the public.

536 "" (0)

01:20:13.550 --> 01:20:18.710

And you can just go and look at the north bank of sack state to see what it's going to look like, from any seasons to come.

537 "" (0)

01:20:18.710 --> 01:20:22.520

And I think the U s, Army Corps of engineers needs to address this.

538 "" (0)

01:20:22.520 --> 01:20:28.850

This is a significant loss of the neighborhood, and they need to provide adequate alternatives for the duration of the project.

539 "" (0)

01:20:28.850 --> 01:20:32.930

And similarly, the final product after those many years.

540 "" (0)

01:20:32.930 --> 01:20:36.110

Needs to be a recreational equivalency to the current river.

541 "" (0)

01:20:36.110 --> 01:20:42.410

If you look at the South side, which you stated in your Pre recorded project report the presentation.

542 "" (0)

01:20:42.410 --> 01:20:49.520

That's stretched by the guy with bridge is now a canal. He does not offer the same equivalent to what our river has.

543 "" (0)

01:20:49.520 --> 01:20:57.980

It's artificially straightened. It has no variation in the in the travel of the edge. There's no still standing water in which you can go in or explore the river.

544 "" (0)

01:20:57.980 --> 01:21:01.160

And it doesn't have the same areas for fish to stand in the water.

545 "" (0)

01:21:01.160 --> 01:21:07.370

They're not building pathways to access the river. The vegetation is right with invasive species. Like.

546 "" (0)

01:21:07.370 --> 01:21:10.580

And it's just not equivalent to what we have here in this area.

547 "" (0)

01:21:10.580 --> 01:21:18.770

And it's recreationally more like a canal, and it's not the equivalent of what we have around the lower American river river miles.

548 "" (0)

01:21:18.770 --> 01:21:21.830

And I think the U s, Army Corps of engineers needs to ensure.

549 "" (0)

01:21:21.830 --> 01:21:26.900

That the recreational use of the river is equivalent both during the project and after.

550 "" (0)

01:21:26.900 --> 01:21:30.553

And I would say this should also be brought into commuting as other people brought up.

551 "Keleigh Duey" (1771176192)

01:21:30.553 --> 01:21:36.576

And finally, I know this is more to go over there. It's okay. Submit.

552 "Mikkel Herholdt Jensen" (848738304)

01:21:36.576 --> 01:21:44.330

Please okay, I want to say, finally, I think that the U s Army Corps engineer also need to ensure that the project is not negatively impact.

553 "Mikkel Herholdt Jensen" (848738304)

01:21:44.330 --> 01:21:49.917

The health of the community before they proceed with their current destructive plan. Thank you. Okay. Thank you.

554 "Keleigh Duey" (1771176192)

01:21:49.917 --> 01:21:56.630

I see Matt car has his hand up so I'm going to try this again.

555 "Keleigh Duey" (1771176192)

01:21:56.630 --> 01:22:02.690

That car had been unmuted.

556 "Keleigh Duey" (1771176192)

01:22:09.170 --> 01:22:16.375

We cannot hear you though, if you're on your phone, what do we have to press.

557 "Bailey Hunter" (1289876992)

01:22:16.375 --> 01:22:22.260

A star 6, um, and I.

558 "Matt Carr" (134787840)

01:22:22.260 --> 01:22:24.316

I see Matt, you're on there twice.

559 "Keleigh Duey" (1771176192)

01:22:24.316 --> 01:22:26.654

Sorry can you hear me? Yes.

560 "Matt Carr" (134787840)

01:22:26.654 --> 01:22:40.400

Wonder, I'm struggling with my microphone and not on any other platform so I apologize. Thank you so much for the other comments. I agree with many of your comments. I'll try to be concise and not repetitive.

561 "Matt Carr" (134787840)

01:22:40.400 --> 01:22:47.900

The thrust of my 2 main comments are that the aesthetic analysis and the recreational analysis.

30

562 "Matt Carr" (134787840)

01:22:47.900 --> 01:22:51.800

In the is woefully deficient.

563 "Matt Carr" (134787840)

01:22:51.800 --> 01:23:00.950

The most important point that I'd like to make is with regard to rip wrap the proposal posits putting miles of.

564 "Matt Carr" (134787840)

01:23:00.950 --> 01:23:04.100

Really.

565 "Keleigh Duey" (1771176192)

01:23:08.095 --> 01:23:14.974

The well, there you are, we missed we missed a like a sentence or 2.

566 "Matt Carr" (134787840)

01:23:14.974 --> 01:23:21.770

Okay, I'll I apologize. My audio is a nightmare today. No matter how I try it.

567 "Matt Carr" (134787840)
01:23:21.770 --> 01:23:29.750

The recreational analysis in the environment document says that there will be short term disruption during construction and staging.

31

568 "Matt Carr" (134787840)
01:23:29.750 --> 01:23:49.750

But it doesn't mention at all the miles of rip wrap that are proposed along the river. There is no mention of long term effects due to losses of beaches, including sandy beaches cove where people recreate mature trees, natural river banks and the likewise there's no alternative to contract 3.

569 "Matt Carr" (134787840)
01:23:49.750 --> 01:23:58.489

That step for us it is this way or no way. I'd like to see some alternatives positive that allow us to keep our natural shortly.

570 "Matt Carr" (134787840)
01:23:58.489 --> 01:24:06.499

The aesthetics analysis likewise says vegetation removal would decrease visual character until plans re-established.

571 "Matt Carr" (134787840)
01:24:06.499 --> 01:24:17.869

32

I can't believe that the aesthetics analysis does not mentioned miles of rip wrap along the river. If you look at that sad state stretch stretch, which the Army Corps counts as being.

572 "Matt Carr" (134787840)
01:24:17.869 --> 01:24:21.409

Beautiful and equivalent and all of that.

573 "Matt Carr" (134787840)
01:24:21.409 --> 01:24:41.409

It it's like a canal there's no natural features along the shoreline. And if you're recreating from the water, it is important. You merely need to look between the 2 stretches of contract between larchmont park and downstream are lot. There is a current section that's rip wrap and it's a terrible looking section. Nobody recreates their every.

574 "Matt Carr" (134787840)
01:24:41.409 --> 01:25:01.409

33

Great upstream or downstream you are going to turn miles of the river into that. And I don't think that anything anyone won. I would also say echo that combining all of these disparate projects into 1 environmental analysis does not allow for any sort of detailed examination. It doesn't allow for alternatives.

575 "Matt Carr" (134787840)
01:25:01.409 --> 01:25:09.409

Any of the on contract, um, and I really, really have to ask for, um.

576 "Matt Carr" (134787840)
01:25:09.409 --> 01:25:13.189

34

Better diagrams it's impossible to, um.

577 "Matt Carr" (134787840)

01:25:13.189 --> 01:25:19.519

To evaluate this project, meaningfully with the maps and diagrams that are so.

578 "Matt Carr" (134787840)

01:25:19.519 --> 01:25:34.159

Um, non granular, there's no detail no construction map no tree inventory and I've read the appendices. I read all 6,500 pages of the document, which I agree is very difficult to read because of the 5 or so projects that are put together in it.

579 "Matt Carr" (134787840)

01:25:34.159 --> 01:25:47.719

35

But the lack of detail is appalling for a project of the magnitude that it is. Finally, I was the lead. I'm an environmental attorney. I was the lead drafter of an environmental, uh.

580 "Matt Carr" (134787840)

01:25:47.719 --> 01:25:52.219

Comment letter on the 2016 initial documentation.

581 "Matt Carr" (134787840)

01:25:52.219 --> 01:26:03.379

36

My my most forceful comment is that I'm appalled to see that the 4 pages of that letter, which were signed by nearly every environmental organization in the Sacramento region and beyond.

582 "Matt Carr" (134787840)

01:26:03.379 --> 01:26:12.079

This this current supplemental environmental document doesn't discuss it. I mean, the, the lack of attention to rip wrap alone is, is.

583 "Matt Carr" (134787840)

01:26:12.079 --> 01:26:28.399

Emblematic of the lack of consideration of previous comments made in 2016. I have many other comments. I'll submit them in written form. Thank you so much. And I, thank all of the fellow advocates who are here on this call and hope that we can organize to have this project.

584 "Matt Carr" (134787840)

01:26:28.399 --> 01:26:34.015

Exist because it's probably needed, but it needs to be done with a much much more nuanced approach.

585 "Keleigh Duey" (1771176192)

01:26:34.015 --> 01:26:38.659

Thank you. Thanks Matt. Glad we were able to hear from you.

586 "Keleigh Duey" (1771176192)

01:26:38.659 --> 01:26:43.669

I'll go to the next, uh, David be.

587 "Keleigh Duey" (1771176192)

01:26:43.669 --> 01:26:47.613

Can I send you a request to unmute?

588 "Keleigh Duey" (1771176192)

01:26:49.656 --> 01:26:51.515

Yeah, I think that's me. Can you hear me.

589 "David B" (854901760)

01:26:51.515 --> 01:26:57.949

Yes, yeah, hi. Yeah, my name's David ball. Um, I did comment last time. Um.

590 "David B" (854901760)

01:26:57.949 --> 01:27:01.369

And I don't want, I don't want to repeat what I said last time and, uh.

591 "David B" (854901760)

01:27:01.369 --> 01:27:07.339

I don't think I could probably say anything with any more detail that there's already been said by many.

592 "David B" (854901760)

01:27:07.339 --> 01:27:18.889

Concerned and intelligent neighbors um, I agree with what the comments made so far and I'd just like to add, um, you know, how concerned I am about the project design.

593 "David B" (854901760)

01:27:18.889 --> 01:27:23.569

My family really enjoy the natural beauty of the river, you know, as it is.

594 "David B" (854901760)

01:27:23.569 --> 01:27:27.769

We've been here for for 30 years and like it the way it is.

595 "David B" (854901760)

01:27:27.769 --> 01:27:34.399

37 Um, and that 3 B design, and it looks to totally remake our section of river.

596 "David B" (854901760)

01:27:34.399 --> 01:27:37.759

In the trail, not to mention the trail that are down there that we use.

597 "David B" (854901760)

01:27:37.759 --> 01:27:40.969

And to what looks like a man made river escape.

598 "David B" (854901760)

01:27:40.969 --> 01:27:52.009

Um, lastly, I'd probably I'd asked that maybe the project timeline be slowed down some if that's possible recommend that more outreach be attempted.

38

599 "David B" (854901760)

01:27:52.009 --> 01:27:59.352

Uh, because when I talk to my neighbors around here, a lot of them don't even know the process about to kick off. So, um, that's all. I have.

600 "Keleigh Duey" (1771176192)

01:27:59.352 --> 01:28:02.389

Thank you David.

601 "Keleigh Duey" (1771176192)

01:28:02.389 --> 01:28:09.333

Thank you, Jamie, I sent you a request.

602 "Keleigh Duey" (1771176192)

01:28:11.255 --> 01:28:13.650

Yes, thank you. You can hear me. Yep.

603 "Jaime" (3438995968)

01:28:13.650 --> 01:28:32.949

39

Perfect, I live in the neighborhood of contract the river's my backyard, which I use on a regular basis i2nd 1 of the previous speakers. Also, those in neighborhood aren't the only ones that use the Parkway and the public at large should have been notified. Not.

604 "Jaime" (3438995968)

01:28:32.949 --> 01:28:37.549

Just the neighborhood on small postcards that were sent out not that long ago.

605 "Jaime" (3438995968)

01:28:37.549 --> 01:28:51.769

But I did talk a little bit about this last time I want to touch on mental health. This is something that is very important. Very important to me and many others of all ages and is not taken into consideration regarding this project.

606 "Jaime" (3438995968)

01:28:51.769 --> 01:29:11.769

40

The destruction of the green space on the American river will impact the mental health of those who regularly use the river for a multitude of activities, including, but not limited to walking, hiking, running biking and meditation. There is extensive, empirical literature on the association between exposure to nature and health nature.

607 "Jaime" (3438995968)

01:29:11.769 --> 01:29:31.769

Closure improves cognitive function, brain activity, blood pressure, mental, health, physical activity, and sleep results from a multitude of studies, provide evidence of protective effects of exposure to natural environments on mental health outcomes and cognitive function. Research has linked to exposure to trees to both.

608 "Jaime" (3438995968)

01:29:31.769 --> 01:29:51.769

And mental restoration, for example, a number of studies have found that exposure to urban for is generally reduces mental and physical stress, anxiety and depression, and that. They improve moods. These conclusions of the benefits of mental health through the exposure of green spaces are supported by cited by the American Psychiatric Association.

609 "Jaime" (3438995968)

01:29:51.769 --> 01:29:56.731

National Institute of health and yellow climate connections, just to name a few.

610 "Keleigh Duey" (1771176192)

01:29:56.731 --> 01:30:02.539

Thank you. Thanks, Jamie.

611 "Keleigh Duey" (1771176192)

01:30:02.539 --> 01:30:06.013

Alicia East fold.

612 "Alicia Eastvold" (1940704768)

01:30:06.013 --> 01:30:11.899

All right. Can you hear me? Yes. Yeah.

613 "Alicia Eastvold" (1940704768)

01:30:11.899 --> 01:30:17.719

I want to express, um, the importance of your care with this project.

614 "Alicia Eastvold" (1940704768)

01:30:17.719 --> 01:30:33.049

This river is a part of the fabric of our community. It's the pride of Sacramento, and when you go to Disneyland and go for right on soaring over California, it's this river that the world sees and this project needs more care and buy in from your community. As you go.

41

615 "Alicia Eastvold" (1940704768)

01:30:33.049 --> 01:30:44.869

When it comes down to the thing that we are all most expressing our concern and care about is that you can make this project as least impactful as possible. Because at the end of the day.

616 "Alicia Eastvold" (1940704768)

01:30:44.869 --> 01:31:04.869

When you all go home to your different communities, we're here to live with what you do, and will be permanently impacted. Um, not just in the construction type, but possibly for generations to come. So, as a community, we're wanting to know that this is handled not with a large pickax, but with the scalpel and from everything.

617 "Alicia Eastvold" (1940704768)

01:31:04.869 --> 01:31:17.719

Thing that I've been gathering from the pixelated pictures to the lack of detail on the swath of the river that's going to have trees removed. It's really unclear how you're.

618 "Alicia Eastvold" (1940704768)

01:31:17.719 --> 01:31:37.719

Handling this with the scalpel that this type of work needs, we all want what you're wanting and what your organization helps to do, which is have a safer infrastructure for our community. And I, I haven't heard 1 commenter that has disagreed with that goal. I think we all have that in mind.

42

619 "Alicia Eastvold" (1940704768)

01:31:37.719 --> 01:31:49.729

But I have to believe that a group is brilliant as the Army Corps of engineers, which is doing this work across the United States, not just with the American river. But as I've spoken with friends in Montana.

620 "Alicia Eastvold" (1940704768)

01:31:49.729 --> 01:31:55.819

That many communities across the United States are facing these same challenges that we're facing.

621 "Alicia Eastvold" (1940704768)

01:31:55.819 --> 01:32:00.799

But I want to believe that your brilliance, which I believe is there and.

622 "Alicia Eastvold" (1940704768)

01:32:00.799 --> 01:32:06.769

That you can live up to the ideals that California is all about, and preserve the ecology of a place.

623 "Alicia Eastvold" (1940704768)

01:32:06.769 --> 01:32:10.939

While also developing an infrastructure to keep our home safe.

624 "Alicia Eastvold" (1940704768)

01:32:10.939 --> 01:32:28.849

But to do, that requires getting into the detail, you're, you're interacting with simple. I, I feel like a simple minded neighbor. I don't understand all of the engineering of it, but I do understand the ecology of a place and I understand that innovation can do 2 things at once.

625 "Alicia Eastvold" (1940704768)

01:32:28.849 --> 01:32:44.599

But that's going to require getting into the detail and I just want to reiterate why I, I think that results in needing to have a more in person detailed reports, um, where we can walk through and see what sorts of.

626 "Alicia Eastvold" (1940704768)

01:32:44.599 --> 01:32:48.379

Possible trees are going to have to go down. What sort of.

627 "Alicia Eastvold" (1940704768)

01:32:48.379 --> 01:32:51.499

Alternatives we've seen the evidence of what you've done.

628 "Alicia Eastvold" (1940704768)

01:32:51.499 --> 01:33:07.699

Um, at the lower sex state area, and I think our goal is to make sure that that doesn't happen further along because I know we're all impacted. I'd also like to express. I've lived here since 2021 and I never received any notice of anything in 2022 is what you've shared.

629 "Alicia Eastvold" (1940704768)

01:33:07.699 --> 01:33:11.809

I'd like to understand better where the public.

630 "Alicia Eastvold" (1940704768)

01:33:11.809 --> 01:33:19.808

Um, outreach was being done and how will continue, because it's been very difficult to understand the, the scope of this project along the way.

631 "Keleigh Duey" (1771176192)

01:33:19.808 --> 01:33:32.419

Thank you thank you Alicia. Um, let's see I have a guest.

632 "Keleigh Duey" (1771176192)

01:33:40.219 --> 01:33:47.214

So, if you've logged on as a guest, I've unmuted you or sent you a request on mute.

633 "christy epperson" (2187569152)

01:33:47.214 --> 01:33:48.756

Huh.

634 "Keleigh Duey" (1771176192)

01:33:48.756 --> 01:33:53.174

Hello Hi, I guess.

635 "christy epperson" (2187569152)

01:33:53.174 --> 01:33:58.039

My name's Christie and my grandmother's house backs up.

636 "christy epperson" (2187569152)

01:33:58.039 --> 01:34:01.189

To the, uh, construction area.

637 "christy epperson" (2187569152)

01:34:01.189 --> 01:34:05.989

That is being discussed and I'm concerned about his health and wellbeing.

638 "christy epperson" (2187569152)

01:34:05.989 --> 01:34:16.969

But I'm also concerned about everybody in the community of Sacramento, because, as other people have said, the American river Parkway is the jewel of Sacramento and in.

639 "christy epperson" (2187569152)

01:34:16.969 --> 01:34:34.039

I think it was 9,972 the wild senior caregivers act was passed that prohibits activities that could damage soil water, timber, habitat close to the river. It also bars the water board and other state agencies from assisting a licensing facilities.

640 "christy epperson" (2187569152)

01:34:34.039 --> 01:34:37.729

That could harm the wild and seek values of the protected river.

641 "christy epperson" (2187569152)

01:34:37.729 --> 01:34:47.449

And I want to point out what a low percentage of rivers in California are actually designated wild and scenic. So I don't understand.

642 "christy epperson" (2187569152)
01:34:47.449 --> 01:34:50.899
How this extensive.

643 "christy epperson" (2187569152)
01:34:50.899 --> 01:34:55.009
Construction and change in the habitat.

644 "christy epperson" (2187569152)
01:34:55.009 --> 01:34:59.869
Is allowable I don't understand how it's been circumvented.

645 "christy epperson" (2187569152)
01:34:59.869 --> 01:35:04.794
Because that's what it seems to me. I appreciate your time.

646 "Keleigh Duey" (1771176192)
01:35:04.794 --> 01:35:21.179
Fine, thank you. Christie seems like, okay, next on the list is Brian Whalen.

647 "Brian Whalen, P.G." (3429058048)
01:35:21.179 --> 01:35:26.599
Hi, good evening. Um.

648 "Brian Whalen, P.G." (3429058048)
01:35:26.599 --> 01:35:30.379
All right, a few comments here, I'll go through them quickly.

649 "Brian Whalen, P.G." (3429058048)
01:35:30.379 --> 01:35:34.489
Public outreach for the proposed work has been insufficient.

650 "Brian Whalen, P.G." (3429058048)
01:35:34.489 --> 01:35:39.769
1 postcard being provided with a 45 day opportunity for public comment.

651 "Brian Whalen, P.G." (3429058048)
01:35:39.769 --> 01:35:47.359
2 weeks of which occurred during the holidays is not sufficient to review and comment on 1000 page technical documents.

652 "Brian Whalen, P.G." (3429058048)
01:35:47.359 --> 01:35:51.529
Pixelated figures showing unclear information to the affected community.

653 "Brian Whalen, P.G." (3429058048)
01:35:51.529 --> 01:36:05.299
Is insufficient I would assume that the Army Corps and its consultants have had years to plan and prepare these evaluations and documents and it is only fair to provide the affected communities with a command certain amount of time to respond.

654 "Brian Whalen, P.G." (3429058048)

01:36:05.299 --> 01:36:12.229

Additional outreach is especially warranted considering that the beginning of the 2nd, online meeting for opportunity.

655 "Brian Whalen, P.G." (3429058048)

01:36:12.229 --> 01:36:16.489

For a public to contribute was botched by technical issues.

656 "Brian Whalen, P.G." (3429058048)

01:36:16.489 --> 01:36:26.329

Um, and, uh, all the questions being provided by the publisher in this meeting, and the 1 last week, we'll hopefully be addressed by, um.

657 "Brian Whalen, P.G." (3429058048)

01:36:26.329 --> 01:36:33.709

The core of engineers with opportunity for the community to review and accept those responses.

658 "Brian Whalen, P.G." (3429058048)

01:36:33.709 --> 01:36:38.149

Um, it's fine that meetings have been, um.

659 "Brian Whalen, P.G." (3429058048)

01:36:38.149 --> 01:36:45.679

Conducted online via zoom previously. However, there's been a significant number of people just during this meeting.

47

660 "Brian Whalen, P.G." (3429058048)

01:36:45.679 --> 01:36:50.749

Who have requested an in person, public meeting and, um.

661 "Brian Whalen, P.G." (3429058048)

01:36:50.749 --> 01:36:55.909

I would advocate for the core, um, holding a public meeting and not being, um.

662 "Brian Whalen, P.G." (3429058048)

01:36:55.909 --> 01:36:59.329

Uh, for lack of better word of cowards.

663 "Brian Whalen, P.G." (3429058048)

01:36:59.329 --> 01:37:14.419

Um, a couple of questions 1 is has a cost analysis been performed on how much more it will cost for rock protection to be installed surrounding these existing trees, rather than trying to remove them.

664 "Brian Whalen, P.G." (3429058048)

01:37:14.419 --> 01:37:18.199

An appropriate cost analysis would.

48

665 "Brian Whalen, P.G." (3429058048)

01:37:18.199 --> 01:37:25.429

Include loss of hundreds of trees, which are hundreds of years old, which are essentially and replaceable.

666 "Brian Whalen, P.G." (3429058048)

01:37:25.429 --> 01:37:34.009

A loss of associated tourism and recreation and commuter aspects associated with those trees and loss of property value in the.

667 "Brian Whalen, P.G." (3429058048)

01:37:34.009 --> 01:37:39.289

In the effective communities, um, another question is.

668 "Brian Whalen, P.G." (3429058048)

01:37:39.289 --> 01:37:53.809

And, you know, is it correct um, in reviewing these documents that the nearest Levy or whole samples used to characterize the condition of the Levy in the area around we're collected over a mile away near how Avenue.

669 "Brian Whalen, P.G." (3429058048)

01:37:53.809 --> 01:37:59.779

And that there were only 5 samples collected from that area and that a decent number of.

670 "Brian Whalen, P.G." (3429058048)

01:37:59.779 --> 01:38:03.349

Decisions are being made on that data.

49

671 "Brian Whalen, P.G." (3429058048)

01:38:03.349 --> 01:38:23.349

Um, a significant amount of shoreline geology along section 3 has lots of what the technical documents referred to as a Pleistocene barracks formation, which is a hard pan clay resistant to erosion the relevant erosion protection report, recommended that.

672 "Brian Whalen, P.G." (3429058048)

01:38:23.349 --> 01:38:36.469

The U. S Army Corps map out those pherox formations in order to minimize the amount of work that, um, the amount of erosion control work that they would have to be performed.

673 "Brian Whalen, P.G." (3429058048)

01:38:36.469 --> 01:38:45.919

And, you know, it doesn't look like that happens. So, my question is, why did the Army Corps not follow through with the recommendations from the erosion protection report?

674 "Brian Whalen, P.G." (3429058048)

01:38:45.919 --> 01:38:56.389

50

Why we're why we're more samples not collected and why were the areas with the pharaohs formation? Not mapped out sufficiently.

675 "Brian Whalen, P.G." (3429058048)

01:38:56.389 --> 01:39:10.069

Um, as somebody else, uh, stated contract offers no alternatives. Uh, there is just the, the, the path offered forward and, um.

676 "Brian Whalen, P.G." (3429058048)

01:39:10.069 --> 01:39:25.999

51

You know, typically, there is an analysis of alternatives, different methods, which may be taken to perform this work and protect public health. That doesn't appear to really have been provided with the analysis.

677 "Brian Whalen, P.G." (3429058048)

01:39:25.999 --> 01:39:32.989

1 of the slides I noted it said that the planning for contract.

678 "Brian Whalen, P.G." (3429058048)

01:39:32.989 --> 01:39:40.009

On the north side of the American river, um, was planned for the future, but that has not been completed yet.

679 "Brian Whalen, P.G." (3429058048)

01:39:40.009 --> 01:39:43.369

My personal take is that, um.

680 "Brian Whalen, P.G." (3429058048)

01:39:43.369 --> 01:39:53.359

That planning and design will never be completed because that's the side of the river where the residents have money. So surprise. Surprise. That is, um.

52

681 "Brian Whalen, P.G." (3429058048)

01:39:53.359 --> 01:39:56.869

You know, 1st, in line for all this stuff um.

682 "Brian Whalen, P.G." (3429058048)

01:39:56.869 --> 01:40:00.979

For B is, you know, just tentative out there in the future.

683 "Brian Whalen, P.G." (3429058048)

01:40:00.979 --> 01:40:20.979

I'm sure I'm sure those rich neighborhoods will be just, uh, lining up to have this work performed in their backyards. Um, and my last question slash comment is whether each of the questions typed out in this meeting chat will be transcribed and responded to in future.

53

684 "Brian Whalen, P.G." (3429058048)

01:40:20.979 --> 01:40:25.813

Final version of the environmental impact report documents.

685 "Keleigh Duey" (1771176192)

01:40:25.813 --> 01:40:28.969

Very much Thank you Brian.

686 "Keleigh Duey" (1771176192)

01:40:28.969 --> 01:40:33.649

Um, the only question I can answer is yes, this entire chat.

687 "Keleigh Duey" (1771176192)

01:40:33.649 --> 01:40:39.529

Um, will be recorded and transcribed as well as everything that, um.

688 "Keleigh Duey" (1771176192)

01:40:39.529 --> 01:40:45.183

Is verbal I'll go to C Duke.

689 "C Duke" (527039488)

01:40:45.183 --> 01:40:49.969

Can you guys hear me? Okay? Yes.

690 "C Duke" (527039488)

01:40:49.969 --> 01:40:56.449

All right, so my name's Clint Duke. I live near the larchmont community park in college, so.

691 "C Duke" (527039488)

01:40:56.449 --> 01:41:02.389

Basically ground 0 for the chorus project. 3 B South.

692 "C Duke" (527039488)

01:41:02.389 --> 01:41:05.899

Footprint I fly fish.

693 "C Duke" (527039488)

01:41:05.899 --> 01:41:09.949

Pretty regularly, both in this river and other rivers. So.

54

694 "C Duke" (527039488)

01:41:09.949 --> 01:41:16.129

I've kind of view these documents the, and I are through the lens of.

695 "C Duke" (527039488)

01:41:16.129 --> 01:41:23.179

You know, salmon and steel head and half Pounder fishing. They're all particular interest to me, as are their habitats.

696 "C Duke" (527039488)

01:41:23.179 --> 01:41:37.099

So, in reviewing the documents, I've noticed that project South is really in direct contrast with some of the American river Parkway, planned goals and policies in terms of habitat protection for those.

697 "C Duke" (527039488)

01:41:37.099 --> 01:41:45.709

Some on its so think, like I said earlier, salmon, steelhead, et cetera. So.

698 "C Duke" (527039488)

01:41:45.709 --> 01:41:58.279

And, you know, the reason this lower American river was granted a while in Phoenix status in the 1st place has a lot to do with those very fish. So, um, but, but within.

699 "C Duke" (527039488)

01:41:58.279 --> 01:42:03.259

The American river Parkway plan gold policy 3.11States.

700 "C Duke" (527039488)

01:42:03.259 --> 01:42:09.409

And I quote, agencies managing the parkway shall identify enhance and protect.

701 "C Duke" (527039488)

01:42:09.409 --> 01:42:14.749

Areas where maintaining repair and vegetation will benefit the aquatic.

702 "C Duke" (527039488)

01:42:14.749 --> 01:42:26.629

And terrestrial resources, and current shaded and aquatic habitat a lot of times that's referred to as SRA that's shaded aquatic habitat.

703 "C Duke" (527039488)

01:42:26.629 --> 01:42:29.809

The central valley flood protection plan.

704 "C Duke" (527039488)

01:42:29.809 --> 01:42:33.769

Has a very similar statement to this in section 5.207.

705 "C Duke" (527039488)

01:42:33.769 --> 01:42:41.539

Of their 2016 conservation strategy, listing a need for continuous corridors of repairing vegetation.

706 "C Duke" (527039488)

01:42:41.539 --> 01:42:47.179

And shady river and aquatic habitat that's that SRA popping up again.

707 "C Duke" (527039488)

01:42:47.179 --> 01:42:53.359

And in the USA says own 4.2.1.

708 "C Duke" (527039488)

01:42:53.359 --> 01:42:58.579

It quotes SRA as represented by overhead canopy cover.

709 "C Duke" (527039488)

01:42:58.579 --> 01:43:08.299

Overhanging vegetation moderate water temperatures, which is an important factor for various life stages of native fish species. So I basically.

710 "C Duke" (527039488)

01:43:08.299 --> 01:43:12.169

I am quoting all these various policies because.

711 "C Duke" (527039488)

01:43:12.169 --> 01:43:30.889

It's this canopy in project South is so important. Basically what this boils down to is high water temperatures, equal, limited migration, success for selma's and limited survival of eggs and their fry fingerings, various stages of a life cycle. And.

712 "C Duke" (527039488)

01:43:30.889 --> 01:43:40.849

Moreover, rip wrapped banks are terrible for habitat complexity and diversity, which are important for survival growth, migration, reproduction, et cetera.

713 "C Duke" (527039488)

01:43:40.849 --> 01:43:45.919

So, like, the 2 main aspects of this South project.

714 "C Duke" (527039488)

01:43:45.919 --> 01:43:49.069

So, I completely in the face of.

55

715 "C Duke" (527039488)

01:43:49.069 --> 01:43:55.519

Recommendations from the American river Parkway plan as well as the central valley flood protection plan.

716 "C Duke" (527039488)

01:43:55.519 --> 01:44:01.279

Uh, their conservation strategy, you were moving a canopy of over 500 trees.

717 "C Duke" (527039488)

01:44:01.279 --> 01:44:05.209

And installing unnecessary. Rep. rep revetment.

718 "C Duke" (527039488)

01:44:05.209 --> 01:44:14.989

As proposed, and 3 B, South will lead to a substantial loss of shade and habitat diversity, which could lower the survival rate of various species of.

719 "C Duke" (527039488)

01:44:14.989 --> 01:44:21.169

Um, among other animals really? And these are just 2 policies that that I found.

720 "C Duke" (527039488)

01:44:21.169 --> 01:44:25.999

Just scanning through the project is just bulldozing.

721 "C Duke" (527039488)

01:44:25.999 --> 01:44:33.709

Right over in this quest for erosion, potential protection, but they really have yet to even show exists.

722 "C Duke" (527039488)

01:44:33.709 --> 01:44:38.749

In the specific area of the river so it's very concerning from a.

723 "C Duke" (527039488)

01:44:38.749 --> 01:44:45.529

You know, from a recreational standpoint, and a conservation standpoint, and I just, I haven't seen.

724 "C Duke" (527039488)

01:44:45.529 --> 01:44:52.849

Uh, a need for it, uh, uh, described in the documentation, um, backed by data.

725 "C Duke" (527039488)

01:44:52.849 --> 01:44:57.559

So, again, echoing the sentiments of people from earlier were really asking for.

726 "C Duke" (527039488)

01:44:57.559 --> 01:45:00.739

A specific targeted solution.

727 "C Duke" (527039488)

01:45:00.739 --> 01:45:06.625

Not a 1 size fits all bulldoze job. It just, it just does not make sense.

728 "Keleigh Duey" (1771176192)

01:45:06.625 --> 01:45:10.159

So, thanks, Clint.

729 "Keleigh Duey" (1771176192)

01:45:10.159 --> 01:45:18.859

I'm going to go the next speaker I want to make sure that we can get to everyone. So I'm going to try to be a little, um.

730 "Keleigh Duey" (1771176192)

01:45:18.859 --> 01:45:22.999

Keeping everyone to 2 minutes um, Joe O Connor.

731 "Joe O'Connor" (3956556544)

01:45:26.308 --> 01:45:30.799

Yes, I assume you can hear me.

732 "Joe O'Connor" (3956556544)

01:45:30.799 --> 01:45:38.449

Yes, okay. Yes, I'm aware of something called the core standard level.

733 "Joe O'Connor" (3956556544)

01:45:38.449 --> 01:45:41.509

Which, uh, has to do with design.

734 "Joe O'Connor" (3956556544)

01:45:41.509 --> 01:45:44.929

Among other things and the.

735 "Joe O'Connor" (3956556544)

01:45:44.929 --> 01:45:49.009

Trees not being allowed 1 and near levee.

736 "Joe O'Connor" (3956556544)

01:45:49.009 --> 01:45:52.489

The.

737 "Joe O'Connor" (3956556544)

01:45:52.489 --> 01:45:58.009

Sacramento area of flood control agency put on a few years ago.

738 "Joe O'Connor" (3956556544)

01:45:58.009 --> 01:46:04.159

2 symposiums were engineers and geologists so forth.

739 "Joe O'Connor" (3956556544)

01:46:04.159 --> 01:46:08.959

From Europe and all around the United States.

57

740 "Joe O'Connor" (3956556544)

01:46:08.959 --> 01:46:13.519

To a large meeting to discuss flood control.

741 "Joe O'Connor" (3956556544)

01:46:13.519 --> 01:46:22.939

Types of soil and importantly, the advisory ability or permitting trees on, or near.

742 "Joe O'Connor" (3956556544)

01:46:22.939 --> 01:46:26.539

I think if we had in person meetings.

743 "Joe O'Connor" (3956556544)

01:46:26.539 --> 01:46:29.689

Of the engineers, the core of engineers.

744 "Joe O'Connor" (3956556544)

01:46:29.689 --> 01:46:36.169

Could kind of explain to the public what constraints they're operating under.

745 "Joe O'Connor" (3956556544)

01:46:36.169 --> 01:46:43.999

And with regards to consideration of the information that came from those 2 symposiums.

746 "Joe O'Connor" (3956556544)

01:46:43.999 --> 01:46:47.239

1 of which I attended.

747 "Joe O'Connor" (3956556544)

01:46:47.239 --> 01:46:50.929

I think it's important for the public to understand.

748 "Joe O'Connor" (3956556544)

01:46:50.929 --> 01:46:55.849
Number 1, reasoning behind the cores design.

749 "Joe O'Connor" (3956556544)
01:46:55.849 --> 01:46:59.029
And also how much leeway they have.

58 750 "Joe O'Connor" (3956556544)
01:46:59.029 --> 01:47:05.240
With regards to things like the trees on and near the levee.

751 "Keleigh Duey" (1771176192)
01:47:05.240 --> 01:47:09.349
All I have, thank you, Joe.

752 "Keleigh Duey" (1771176192)
01:47:09.349 --> 01:47:13.909
I'll go to Ellen gantz.

753 "Keleigh Duey" (1771176192)
01:47:13.909 --> 01:47:18.244
Joe.

754 "Joe O'Connor" (3956556544)
01:47:18.244 --> 01:47:19.581
I'm going to mute, you.

755 "Keleigh Duey" (1771176192)
01:47:19.581 --> 01:47:21.862
Okay.

756 "Ellen Ganz" (1757378304)
01:47:21.862 --> 01:47:25.579
Okay, thanks, Joe. Ellen, you're up. Hi. Can you hear me.

757 "Ellen Ganz" (1757378304)
01:47:25.579 --> 01:47:30.979
Yes, thank you. So at the last meeting, I did speak and I want to.

59 758 "Ellen Ganz" (1757378304)
01:47:30.979 --> 01:47:46.039
To have some questions answered, because I live on the 1 of the streets where the trucks will be going by to, to the park. My street is listed and I am 3 houses down from larchmont park that.

759 "Ellen Ganz" (1757378304)
01:47:46.039 --> 01:47:59.359
I need to know how much smog and air quality to expect. I need to know if this is safe for my 8 year old child to to live. And it, it's.

760 "Ellen Ganz" (1757378304)
01:47:59.359 --> 01:48:04.219

Disheartening to have this be called a public meeting when.

761 "Ellen Ganz" (1757378304)

01:48:04.219 --> 01:48:11.689

When it's when we're not able to ask questions that are answered by what presumably is a very.

762 "Ellen Ganz" (1757378304)

01:48:11.689 --> 01:48:21.349

Qualify knowledgeable group of people back there for someone to just be able to answer questions. And so I would join in the request for.

763 "Ellen Ganz" (1757378304)

01:48:21.349 --> 01:48:38.989

Meetings where our questions are answered and to have an in person public meeting. Um, it is the section that I am talking about that everyone else is, um, I was very curious that.

764 "Ellen Ganz" (1757378304)

01:48:38.989 --> 01:48:43.219

That miss doing, you said early on that, there would be some new.

765 "Ellen Ganz" (1757378304)

01:48:43.219 --> 01:48:48.949

Or different information from the questions last week, because I really did want.

766 "Ellen Ganz" (1757378304)

01:48:48.949 --> 01:48:51.979

It's very stressful, not knowing what to expect.

767 "Ellen Ganz" (1757378304)

01:48:51.979 --> 01:49:07.909

And I don't see why if we have this extensive proposal that these questions can't just be answered in a straightforward way of how many trucks will be down my street every day. Is this going to be on and off? Will it be constant? What hours.

768 "Ellen Ganz" (1757378304)

01:49:07.909 --> 01:49:19.369

What are the toxins that are in the air? Um, what are there? Is there any way to measure that into measure if it gets to unsafe levels? Is there any plan for that?

769 "Ellen Ganz" (1757378304)

01:49:19.369 --> 01:49:34.639

Is there any contact information we can reach out to, um, the, the early wine, elementary school backs up to a construction area? Is it going to be safe for the children in that?

770 "Ellen Ganz" (1757378304)

01:49:34.639 --> 01:49:41.359

That school and what mitigation efforts if any are going to take place so, it it can be safe.

771 "Ellen Ganz" (1757378304)

01:49:41.359 --> 01:49:45.469

Um, I really need to know if I should move.

772 "Ellen Ganz" (1757378304)

01:49:45.469 --> 01:49:52.069

Or relocate temporarily, because I don't want to expose my child to harmful.

773 "Ellen Ganz" (1757378304)

01:49:52.069 --> 01:50:04.459

Chemicals, it's, it's it's quite scary and as, as someone said at the last meeting, we're all reasonable people here who are educated and want protection.

774 "Ellen Ganz" (1757378304)

01:50:04.459 --> 01:50:07.519

For the, the levies and just want.

775 "Ellen Ganz" (1757378304)

01:50:07.519 --> 01:50:23.269

To be heard and be included, because, as people have said, this is going to be absolutely devastating for our neighborhood that I chose to live here for this outdoor space thinking that this would be a place. My child can come back to as an adult. That's now all being.

776 "Ellen Ganz" (1757378304)

01:50:23.269 --> 01:50:40.069

Taken away, and if it were the case where I understood that there weren't other options, and they were taking into account I think we'd be a lot more agreeable to that. But just this lack of understanding in the short period of time is.

777 "Ellen Ganz" (1757378304)

01:50:40.069 --> 01:50:46.189

It is disheartening that that I am hoping as as other commenters have stated that.

778 "Ellen Ganz" (1757378304)

01:50:46.189 --> 01:51:02.059

That the Army Corps of engineers with all this feedback about how important this area is, can take a look at how to use a scalpel, rather than an ax that someone said, are there ways to minimize the impacts on the recreational use?

779 "Ellen Ganz" (1757378304)

01:51:02.059 --> 01:51:08.329

On the nature and and on on the noise and the smog and.

780 "Ellen Ganz" (1757378304)

01:51:08.329 --> 01:51:23.179

And keeping this as safe as possible, if we're going to be staying in these communities that I just really ask for any kind of more thoughtful approach and inclusion that that is happening.

781 "Ellen Ganz" (1757378304)

01:51:23.179 --> 01:51:26.869

Right now, um.

782 "Ellen Ganz" (1757378304)

01:51:26.869 --> 01:51:37.579

That that the loss of vegetation and habitat is going to be a strong negative impact on the community. In any way. This can be offset would just be.

783 "Ellen Ganz" (1757378304)

01:51:37.579 --> 01:51:47.749

Just needs to be ensured that the US that we're, I'm asking that this project.

784 "Ellen Ganz" (1757378304)

01:51:47.749 --> 01:51:55.563

Does not negatively impact the health of our community um, and if there's any way to avoid that, that's what I'm.

785 "Keleigh Duey" (1771176192)

01:51:55.563 --> 01:52:06.126

Helping Thank you thank you, Ellen. Kate Rosen. Lee.

786 "Kate Rosenlieb" (388975616)

01:52:06.126 --> 01:52:09.199

Can you hear me.

787 "Kate Rosenlieb" (388975616)

01:52:09.199 --> 01:52:25.309

Yep, I just want to think all the other speakers who have already talked and and done such an outstanding job. There's not a lot I can add I to live near South and.

64

788 "Kate Rosenlieb" (388975616)

01:52:25.309 --> 01:52:38.329

Been here almost 30 years, and it just the, the level of destruction proposed in this project is mind boggling to me and it absolutely will, uh, rip the fabric of our community to shreds.

789 "Kate Rosenlieb" (388975616)

01:52:38.329 --> 01:52:50.929

And I do want to see a more targeted approach. I'm disappointed at the lack of public outreach. I'm disappointed at the short amount of time to respond to these environmental documents.

65

790 "Kate Rosenlieb" (388975616)

01:52:50.929 --> 01:52:56.809

And certainly the timeline for having them come out just before the major holidays.

791 "Kate Rosenlieb" (388975616)

01:52:56.809 --> 01:53:16.809

66

I'm disappointed when I hear the responses from, from various officials connected to this project, when we ask about wildlife while it'll, it'll simply move upstream or downstream. I was here when the slurry wall went in and, you know, a lot.

792 "Kate Rosenlieb" (388975616)

01:53:16.809 --> 01:53:33.559

Wildlife poured into our neighborhood and and and we were left, um, with, with all this wildlife in our neighborhood that's not something there's no mitigation that you're proposing for this. Um, and I'm, I'm, I'm really disappointed.

793 "Kate Rosenlieb" (388975616)

01:53:33.559 --> 01:53:37.069

To hear these comments, especially when you show these.

794 "Kate Rosenlieb" (388975616)

01:53:37.069 --> 01:53:40.699

Pictures on the on site re, vegetation.

795 "Kate Rosenlieb" (388975616)

01:53:40.699 --> 01:53:48.439

By sac state and G, you know, and it practically looks the same in 10 years and and that's just that's.

796 "Kate Rosenlieb" (388975616)

01:53:48.439 --> 01:53:56.899

That's a different type of project, uh, you know, you, you didn't even show what what it looked like before you went in and did the revetment.

797 "Kate Rosenlieb" (388975616)

01:53:56.899 --> 01:54:06.649

And in a lot of the pictures are different angles and the taller trees that you show 15 years later, aren't even on the levee or or on the river bank. They're back at.

798 "Kate Rosenlieb" (388975616)

01:54:06.649 --> 01:54:26.649

Behind everything, it's set state itself and it just, it feels frustrating and disingenuous uh, in that regard. Yes. We all want flood control and appreciate what you're trying to do, but the way this has been rolled out and you hear how desperate we are to keep.

799 "Kate Rosenlieb" (388975616)

01:54:26.649 --> 01:54:32.218

This jewel that is absolutely why all of us are living here.

800 "Keleigh Duey" (1771176192)

01:54:32.218 --> 01:54:39.022

Thank you. Thank you Julie.

801 "JulieG" (795470336)

01:54:41.179 --> 01:55:01.179

I thank you for taking my comment. I posted this last time, and I support so many of the comments that have already been made. I don't want to repeat that. But 1 thing that just keeps stuck in my mind is particularly for contract 3 B, when reviewing the documents, I saw a section that talked about performance assurance.

802 "JulieG" (795470336)

01:55:01.179 --> 01:55:20.569

Before, and after of the project, and the areas, particularly in the, the sites related to contract, if I'm interpreting the materials correctly, seem to indicate that at best, it's gonna be a 60% performance assurance in a 200 year flood event.

803 "JulieG" (795470336)

01:55:20.569 --> 01:55:36.229

Which is what I believe that the project is targeting is a 200 year flood scenario, although a lot of the materials do indicate that you want to support further conveyance or from the increased storage that now capable.

804 "JulieG" (795470336)

01:55:36.229 --> 01:55:40.699

In Boston down and so I really think that that that's important because.

805 "JulieG" (795470336)

01:55:40.699 --> 01:56:00.699

It's what are we getting for what we're losing and if you look at assurances for areas down river, there are areas that are getting higher assurances. And I still am supportive. And in the belief that there is a better approach, a much more surgical approach that I think so many.

806 "JulieG" (795470336)

01:56:00.699 --> 01:56:20.699

People have been asking for and it is extremely critical that we maintain the canopy and corridors and not create islands of these. Because the wildlife that's here that's already threatened or in danger. And those that are just, maybe not on that list are that are struggling to survive are not going to make it.

807 "JulieG" (795470336)

01:56:20.699 --> 01:56:28.159

And the health of our river isn't attached to our health from mental. Well, being physical health, it's our water supply.

808 "JulieG" (795470336)

01:56:28.159 --> 01:56:46.729

You know, gentleman was talking about the Sam and fishery. My husband's an avid flight Fisher as well, but from the salmon fish fishery itself right now we're 1 of the theater locations to 1 of the largest stock areas of salmon.

809 "JulieG" (795470336)

01:56:46.729 --> 01:56:51.259

And, you know, they are a 1.4000.

810 "JulieG" (795470336)

01:56:51.259 --> 01:57:08.029

Industry that supports an estimated 23,000 jobs. It's close right now on all the coast, and all the rivers, because those populations are crashing and in such struggle, and they can't survive if you denuded everything along the Parkway.

811 "JulieG" (795470336)

01:57:08.029 --> 01:57:16.039

Even the fish coming out of the hatchery, trying to feed and grow as they move to and migrate from different areas and out into the ocean.

812 "JulieG" (795470336)

01:57:16.039 --> 01:57:28.759

They are in need and must have the right pairing habitat as well as an appropriate habitat within the riverbed itself. Um, so I just, you know, I think there's a number of issues.

813 "JulieG" (795470336)

01:57:28.759 --> 01:57:34.249

But it is really hard to digest, especially to the.

814 "JulieG" (795470336)

01:57:34.249 --> 01:57:47.210

Level of destruction that appears to be coming to us to see that. We're only going to achieve potentially a 60% or 57% in the other case of 1 of the sites.

815 "JulieG" (795470336)

01:57:47.210 --> 01:57:53.000

Where we're at 45 to maybe 47 today without the.

816 "JulieG" (795470336)

01:57:53.000 --> 01:57:56.948

So, I think it would be really helpful to have more information on that.

817 "Keleigh Duey" (1771176192)

01:57:56.948 --> 01:58:07.058

Thank you thank you, Julie. I'm going to go to the.

818 "Nae" (1566494464)

01:58:07.058 --> 01:58:24.230

Yes, Hello, thank you for the chance to share. And I really appreciate everyone's amazing insights tonight. It's just so inspiring to hear the knowledge that's coming forth from all my neighbors and thank you. Everybody.

819 "Nae" (1566494464)

01:58:24.230 --> 01:58:33.170

So, I'm just sharing some concerns. I live near Sacramento State University and yes, I can attest to the fact that.

820 "Nae" (1566494464)

01:58:33.170 --> 01:58:43.040

The noise during the project was had a negative impacts on my mental health on many days. Um.

821 "Nae" (1566494464)

01:58:43.040 --> 01:59:01.010

Building the buildings building was shaking finally towards the end of the, after most of the, the shaking was done, they put in the meters to try to measure the vibration that should have happened before the project started to monitor that. Um.

822 "Nae" (1566494464)

01:59:01.010 --> 01:59:10.580

So, I have a few requests 1st and foremost stop the project as it currently is without adjustments and without.

72

823 "Nae" (1566494464)

01:59:10.580 --> 01:59:18.740

Without more as everyone else has said more surgical approach without removing these large trees.

824 "Nae" (1566494464)

01:59:18.740 --> 01:59:25.070

And give more time for everyone to read through the documents. Understand ask questions.

825 "Nae" (1566494464)

01:59:25.070 --> 01:59:39.650

73

Also, I would I concur with the request to have opportunities to actually interact on site with, with representatives to be able to have field days like others have suggested and.

826 "Nae" (1566494464)

01:59:39.650 --> 01:59:50.360

74

Another request, at least 1 to 2 months before the project is supposed to begin, please provide a map of the trees that are scheduled for removal on both the North and South sides.

827 "Nae" (1566494464)

01:59:50.360 --> 01:59:57.140

You know, the hope is that with these meetings, those trees are not going to be removed because.

828 "Nae" (1566494464)

01:59:57.140 --> 02:00:00.470

Of the canopy that they're providing, um.

829 "Nae" (1566494464)

02:00:00.470 --> 02:00:13.520

75

The the shade that's being provided in those access points these are the most highly traffic access points along the American river Parkway between the guy West bridge. And what Avenue.

830 "Nae" (1566494464)

02:00:13.520 --> 02:00:30.200

And I don't know about the sell side because I don't live on the South side, but I know that this whole area is a highly access point. I'm concerned about the large mature trees and vegetation between how Avenue water Avenue on the north side.

831 "Nae" (1566494464)

02:00:30.200 --> 02:00:37.490

It provides a substantial shade protection in the summer, and I can't imagine.

832 "Nae" (1566494464)

02:00:37.490 --> 02:00:44.030

The, you know, the increase in heat that those, the removal of those will provide around the river area.

833 "Nae" (1566494464)

02:00:44.030 --> 02:00:49.070
I saw bobcat in that area this fall.

834 "Nae" (1566494464)
02:00:49.070 --> 02:00:54.980
Um, must present alternatives to these large canopy trees being removed.

835 "Nae" (1566494464)
02:00:54.980 --> 02:01:01.280
Even with the watering that happened, there was still layers of dust that got on my car.

836 "Nae" (1566494464)
02:01:01.280 --> 02:01:04.940
And, you know, in in the window cells.

837 "Nae" (1566494464)
02:01:04.940 --> 02:01:11.990
And also, why does the project work east of the J street bridge? Not have any regrowth after 2 years.

838 "Nae" (1566494464)
02:01:11.990 --> 02:01:15.950
That was done before the even the current. So this would have been.

839 "Nae" (1566494464)
02:01:15.950 --> 02:01:23.990
On the work by river park, and I'm still not seeing grass. It's still brown and that's after 2 years. That's very concerning.

840 "Nae" (1566494464)
02:01:23.990 --> 02:01:30.410
So also the public outreach efforts, I agree with that.

841 "Nae" (1566494464)
02:01:30.410 --> 02:01:45.680
I wasn't notified about the work until it already started and that was last year, and I put in a request to the Army Corps to do better outreach to the public and apparently, that hasn't happened. So, a lot of changes please.

842 "Nae" (1566494464)
02:01:45.680 --> 02:01:48.885
Thank you so much for the opportunity and thank you again. All.

843 "Keleigh Duey" (1771176192)
02:01:48.885 --> 02:01:50.960
Neighbors.

844 "Keleigh Duey" (1771176192)
02:01:50.960 --> 02:02:10.160
Thank you, Nick um, if you could write your full name, um, in the chat, um, that might be helpful. Um, just as a recommendation for anyone. Um, it's easier to get hold of you if we have your contact information and

you, you know, it's best to submit via email that way. We have your email, and we can put you on our list as well.

845 "Keleigh Duey" (1771176192)

02:02:10.160 --> 02:02:13.640

Going to go to let's see.

846 "Keleigh Duey" (1771176192)

02:02:13.640 --> 02:02:20.422

Um, Mark, Barry.

847 "Keleigh Duey" (1771176192)

02:02:22.298 --> 02:02:24.737

Hello can you hear me? Yep, I.

848 "Mark Berry" (807891968)

02:02:24.737 --> 02:02:28.880

Mark, thank you. Thanks. Thanks for doing this. Sure. It's not easy.

849 "Mark Berry" (807891968)

02:02:28.880 --> 02:02:33.500

It even though there's some hard things going on.

850 "Mark Berry" (807891968)

02:02:33.500 --> 02:02:46.580

So, it has been some comments about the wild and scenic river aspect of the, uh, the American river Parkway and people referred to it as a regional asset. But really.

851 "Mark Berry" (807891968)

02:02:46.580 --> 02:02:53.690

The American river at lower American river wild and scenic river aspect of it. It's.

852 "Mark Berry" (807891968)

02:02:53.690 --> 02:03:07.700

Uh, it is really the only wild and scenic river flowing through a major metropolitan area in the United States. It's not only a unique regional asset. It's a unique U s asset and.

78

853 "Mark Berry" (807891968)

02:03:07.700 --> 02:03:18.710

You know, it serves as an example, you know, we're all concerned about climate change or whatever aspect of that. But, you know, it's an example of whether humans and wildlife can actually exist.

854 "Mark Berry" (807891968)

02:03:18.710 --> 02:03:31.820

And it is a wild and scenic river for its outstanding remarkable values. 2 of them. 1 is its fishery and the other is it's a recreational aspects.

855 "Mark Berry" (807891968)

02:03:31.820 --> 02:03:35.060

And really those unique values.

856 "Mark Berry" (807891968)

02:03:35.060 --> 02:03:49.010

I think you, what you're hearing from the public here, have not been adequately balanced with the project as proposed. We look at the common features project and open the.

857 "Mark Berry" (807891968)

02:03:49.010 --> 02:03:57.740

Described maybe as a escape there and really that habitats, you know, really been obliterated but when you look at.

858 "Mark Berry" (807891968)

02:03:57.740 --> 02:04:07.730

What the core proposed they did propose very similar kinds of mitigation measures, and there was some performance standards, but now when we turn around and we look at that.

859 "Mark Berry" (807891968)

02:04:07.730 --> 02:04:18.710

That's that's really not acceptable to us to continue in our wild and scenic river corridor. And so what we're asking really of the core is.

860 "Mark Berry" (807891968)

02:04:18.710 --> 02:04:21.860

We're asking for that, not to be repeated.

861 "Mark Berry" (807891968)

02:04:21.860 --> 02:04:41.860

We're asking for more creativity and a much more measured response to what is a truly unique American asset and to treat it, like, any other river and to just chat, analyze it and to get closer to some of these horribly tanalised rivers like La river is is.

862 "Mark Berry" (807891968)

02:04:41.860 --> 02:05:01.860

It's just not appropriate. The American river Parkway plan is really the management plan for the wild and scenic river, which the American river is and that management plan discourages rip wrap on the river. It does require and want to have.

863 "Mark Berry" (807891968)

02:05:01.860 --> 02:05:07.850

Shaded areas, and it does have areas designated as protected areas.

864 "Mark Berry" (807891968)

02:05:07.850 --> 02:05:16.580

And when we look at the plan is proposed, although it's, it really is honestly very hard to follow because it just so generalized but.

865 "Mark Berry" (807891968)

02:05:16.580 --> 02:05:34.550

It doesn't adequately address those protections for the federal and state wild and scenic river that that's under the American river Parkway plan. And I look at the Arusha property, which I guess if you purchased it for the there's 1 tree with an Eagles nest.

866 "Mark Berry" (807891968)

02:05:34.550 --> 02:05:48.140

Well, if you're a Parkway user, like, many of the people here, we see the eagles resting on a lot of the trees. Now again, you see all sorts of birds using those trees and not only are they shades for the fishery and part of the recreational use.

867 "Mark Berry" (807891968)

02:05:48.140 --> 02:05:51.800

But all that's combined with the habitat there so.

868 "Mark Berry" (807891968)

02:05:51.800 --> 02:05:57.740

I just like to suggest that the core of engineers is don't treat this like this, any other place.

869 "Mark Berry" (807891968)

02:05:57.740 --> 02:06:11.300

It really is a unique place. It's a unique American place. There's a goal here goal for the future. Well, for the future of kin, humans really coexist with with the environment.

870 "Mark Berry" (807891968)

02:06:11.300 --> 02:06:17.660

And I think what what's really need here is, is the recognition that's the special project.

871 "Mark Berry" (807891968)

02:06:17.660 --> 02:06:22.708

It really doesn't need some special considerations and I hope that that takes you.

872 "Keleigh Duey" (1771176192)

02:06:22.708 --> 02:06:30.950

Take that into account, thank you. Thanks mark. Going to go to John.

873 "Jon" (3872378368)

02:06:35.737 --> 02:06:43.310

Hi, yeah. Can you hear me? Yep. Great. Thank you. Um.

874 "Jon" (3872378368)

02:06:43.310 --> 02:06:48.020

My full up by phone name in the chat. Um.

875 "Jon" (3872378368)

02:06:48.020 --> 02:06:56.210

Thanks for having this meeting uh, this is the 1st 1 I've attended and, um, you know, other.

876 "Jon" (3872378368)

02:06:56.210 --> 02:07:00.890

Then the postcard I received, um.

877 "Jon" (3872378368)

02:07:00.890 --> 02:07:04.280

This was the 1st, um.

878 "Jon" (3872378368)

02:07:04.280 --> 02:07:11.690

Communications, I received on it besides what I've seen down at the river itself. Um, I'm located between.

879 "Jon" (3872378368)

02:07:11.690 --> 02:07:29.900

How, and what on the northern side and I'm not just, you know, I'm not particularly close to the river. Um, so I i2nd, you know, the idea that this is not just an issue for people who are living, right? Or on the river. I also voice, um.

880 "Jon" (3872378368)

02:07:29.900 --> 02:07:35.810

Consideration and understanding that.

881 "Jon" (3872378368)

02:07:35.810 --> 02:07:41.810

You know, we do need to be mindful of flooding, but I think.

882 "Jon" (3872378368)

02:07:41.810 --> 02:07:48.650

All the comments that were hearing, and today I I don't think we've heard someone say.

883 "Jon" (3872378368)

02:07:48.650 --> 02:08:05.780

Go ahead, with this project, we'd love it. It's great. That may not be that's probably not typical for, for these kinds of meetings where someone comes and says I really wholeheartedly support it. But you're really hearing from a lot of people here, um, who are opposed to it. Um, and.

884 "Jon" (3872378368)

02:08:05.780 --> 02:08:11.090

I think what it comes down to is, do we trust the process that.

885 "Jon" (3872378368)

02:08:11.090 --> 02:08:31.090

Husband laid out for us. Um, do we trust that this? Um, I don't this this thing that's important to our neighborhoods and our communities might, you know, and for transportation. My kid, my kids take the trail, um, to get school because they don't want to ride on the roads, um, to be.

82

886 "Jon" (3872378368)

02:08:31.090 --> 02:08:51.090

So, they won't be exposed to cars, so it's, you know, there's the transportation thing um, I'd also like to, to 2nd or 3rd, the part about mental health here we are on the on the back end of the pandemic where so many people found, um, solas and recharge in the outdoors and now you're gonna be taking away.

887 "Jon" (3872378368)

02:08:51.090 --> 02:09:03.680

That value from them in this place and that's a big deal. Um, you know, I've witnessed wildlife along there. I've seen species that aren't listed um.

888 "Jon" (3872378368)

02:09:03.680 --> 02:09:13.970

You know, I found a rubber boa down there. 1 time. I've seen all this snakes. I've seen otters. I've heard, you know, I've seen a sea line in there, um, between that area. So.

83

889 "Jon" (3872378368)

02:09:13.970 --> 02:09:20.780

This is an important area for wildlife, um, in an area that I use often and my family does and, um.

890 "Jon" (3872378368)

02:09:20.780 --> 02:09:32.330

That, to me, the trust issue is important because I've seen I've spent a lot of time down by a river park and.

84

891 "Jon" (3872378368)

02:09:32.330 --> 02:09:37.388

If it's going to look like that, I don't see how that helps. I'm sorry.

892 "Keleigh Duey" (1771176192)

02:09:37.388 --> 02:09:40.358

That those things are auto generated on my oh, it's fun.

893 "Jon" (3872378368)

02:09:40.358 --> 02:09:44.720

Yeah, Webex I, here you go. Um, I don't see how that.

894 "Jon" (3872378368)

02:09:44.720 --> 02:09:52.700

That improves the situation, but removing vegetation to help. Serge is counter to every sort of.

85

895 "Jon" (3872378368)

02:09:52.700 --> 02:09:57.140

River things about river's eyes after I've ever heard, um.

896 "Jon" (3872378368)

02:09:57.140 --> 02:10:00.650

2nd, you know, uh.

897 "Jon" (3872378368)

02:10:00.650 --> 02:10:04.400

There is this issue of, you know, your.

898 "Jon" (3872378368)

02:10:04.400 --> 02:10:14.390

I'm just looking at some of the documents and 1 of the things that it mentions yellow build cuckoo's and it's not yellow build cuckoo's. It's yellow build magpies and that's.

86

899 "Jon" (3872378368)

02:10:14.390 --> 02:10:21.470

That's an endangered species that would seem like something that people would pay attention to. It is important. And so, um.

900 "Jon" (3872378368)

02:10:21.470 --> 02:10:25.700

I'm having trouble trusting what's going on.

901 "Jon" (3872378368)

02:10:25.700 --> 02:10:44.180

And I just don't see how that kind of project. And what I've seen along the way is going to improve things. I, we just had 1 of the biggest water years in history along this area, despite a little bit of flooding underneath the, what? Um, bridge along the path.

902 "Jon" (3872378368)

02:10:44.180 --> 02:10:50.810

In this area, there wasn't that much fudging and I realized it's an erosion project, but it's related to flooding. And so if.

903 "Jon" (3872378368)

02:10:50.810 --> 02:10:55.610

There weren't huge negative consequences in this area.

904 "Jon" (3872378368)

02:10:55.610 --> 02:11:02.210

During last year, and I went down to, um, uh.

905 "Jon" (3872378368)

02:11:02.210 --> 02:11:11.060

Glen hall park, I don't see how that's going to help and someone mentioned does does the long term benefit.

906 "Jon" (3872378368)

02:11:11.060 --> 02:11:31.060

Of removing this worth the short term pain and I don't I don't see it and so I'm very concerned about this project about something that I use practically every day and people in my family use every day. And I, I just, I don't have that level of trust with the way things. I look down the river and it's the rep. rep and a generalization.

907 "Jon" (3872378368)

02:11:31.060 --> 02:11:35.862

I'm a fly fisherman too. I just I don't see it so I offer that respectfully.

908 "Keleigh Duey" (1771176192)

02:11:35.862 --> 02:11:41.522

I appreciate your time Thank you, John.

909 "Jon" (3872378368)

02:11:41.522 --> 02:11:48.661

Hi, Mara I, she basically.

910 "amara" (2952901376)

02:11:50.900 --> 02:11:51.884

Are you.

911 "Keleigh Duey" (1771176192)

02:11:51.884 --> 02:11:53.944

Here am I here to hear you.

912 "amara" (2952901376)

02:11:53.944 --> 02:12:04.160

Yeah. Okay. Hello. Hi, this is my 1st time attending so I've been keeping up with everything, but I have physically been in the meeting, but I just wanted to add like, my 2 questions.

913 "amara" (2952901376)

02:12:04.160 --> 02:12:09.380

When I was in school, I went to the and studied architecture and graphic design.

914 "amara" (2952901376)

02:12:09.380 --> 02:12:12.470

And I was just curious if there was.

88

915 "amara" (2952901376)

02:12:12.470 --> 02:12:15.770

An environmental designer.

916 "amara" (2952901376)

02:12:15.770 --> 02:12:35.770

Or an environmental graphic designer, even working on the project, because for me, if I were to submit a proposal or project like this to my professor, I would fail. Because in any profession of that regard, like, the main purpose of that is to create functional design that's supplements. You know.

917 "amara" (2952901376)

02:12:35.770 --> 02:12:40.400

The environment, you know what I mean? So.

918 "amara" (2952901376)

02:12:40.400 --> 02:13:00.400

With most Eco designers, they'd be appalled at a project of this magnitude, because they aim to create spaces that are both functional and aesthetically pleasing now, promote a sustainable relationship between people and the environment. And so most designers, environmental architects and regular architects who know who are supposed to call.

919 "amara" (2952901376)

02:13:00.400 --> 02:13:14.210

So, they create environments that are stimulating, normally focus on green spaces and preserve a lot of the grid spaces and topography that balance with the climate. The core of this project from what I've seen in the other, you know.

920 "amara" (2952901376)

02:13:14.210 --> 02:13:19.610

Places where it's been done is ugly. Like, no, in my opinion, and, like.

921 "amara" (2952901376)

02:13:19.610 --> 02:13:28.070

Most of my classmates, any of my professors would agree with me. A pile of dirt that's very poorly executed is not attractive.

922 "amara" (2952901376)

02:13:28.070 --> 02:13:36.380

So, is there anybody in charge of those things? Like, is there anyone even, you know, uh, helping with that, or, like.

923 "amara" (2952901376)

02:13:36.380 --> 02:13:45.170

Is there any of that? Because from my perspective, it doesn't seem like there is you know what I mean? And if so, like, where did they get their credentials from? You know what I mean? Like.

924 "amara" (2952901376)

02:13:45.170 --> 02:13:48.650

It's, it's very, um, absurd in my opinion.

925 "amara" (2952901376)

02:13:48.650 --> 02:13:52.280

And then my other question is just if.

926 "amara" (2952901376)

02:13:52.280 --> 02:14:01.910

This has a projected time, period of like, you know, 15 years or whatever it's going to be so beneficial. Why not wait to have physical data?

927 "amara" (2952901376)

02:14:01.910 --> 02:14:09.980

Of this benefit, instead of ball parking. Oh, maybe this will happen. Or maybe it will just having, like, unclear.

928 "amara" (2952901376)

02:14:09.980 --> 02:14:19.280

Um, evidence, physical evidence, instead of just a projected projection. So, those are just my 2.

929 "amara" (2952901376)

02:14:19.280 --> 02:14:29.300

Well, thanks society and I really like when I tell you, it's ugly, it's just ugly. Like, it's dirt and Sam in piles with little sticks.

930 "amara" (2952901376)

02:14:29.300 --> 02:14:36.230

That have, like, Twine that are, you know, where the plants are going to grow back that they took out, which is.

931 "amara" (2952901376)

02:14:36.230 --> 02:14:50.630

Uh, redundant, I think when you already have natural trees and plants that are already there to remove the ones that are there to put in ones that are not growing yet. Um, and haven't grown in some areas still.

932 "amara" (2952901376)

02:14:50.630 --> 02:14:55.220

Like, what I learned in school that's something that you would absolutely not do.

933 "amara" (2952901376)

02:14:55.220 --> 02:14:59.270

That's very bad. Um, so that's just kind of my, my question.

934 "amara" (2952901376)

02:14:59.270 --> 02:15:06.198

When it comes to all of that, you know, in my little area of study, I just really confused and, um.

935 "Keleigh Duey" (1771176192)

02:15:06.198 --> 02:15:09.650

You know, thanks tomorrow. Yeah, I appreciate your comments.

936 "Keleigh Duey" (1771176192)

02:15:09.650 --> 02:15:14.930

I'm going to go to, um, gay Jones.

937 "Keleigh Duey" (1771176192)

02:15:14.930 --> 02:15:23.480

And we are almost at 8 o'clock. I know we started a little late. So, um, I see a few more hands up.

938 "Keleigh Duey" (1771176192)

02:15:23.480 --> 02:15:29.077

So, we're gonna try to get over to everyone. Um, but I just wanted to let everyone know it's about.

939 "Gay Jones" (2652174336)

02:15:29.077 --> 02:15:37.220

5 minutes date. Oh, okay. Hey, Kate. Good. Good evening. Sorry you got the short straw on this 1 but here it goes.

940 "Gay Jones" (2652174336)

02:15:37.220 --> 02:15:42.920

I have multiple points to make. I have lived in this area since 987.

941 "Gay Jones" (2652174336)

02:15:42.920 --> 02:15:46.280

By the Christmas Recreation area of the Parkway.

942 "Gay Jones" (2652174336)

02:15:46.280 --> 02:15:50.630

Given all the concerns and questions raised about data and outreach.

943 "Gay Jones" (2652174336)

02:15:50.630 --> 02:15:56.000

The court needs to pause, the court needs to pause.

944 "Gay Jones" (2652174336)

02:15:56.000 --> 02:16:03.140

On any new work, given all these questions about data let's see how the project work.

945 "Gay Jones" (2652174336)

02:16:03.140 --> 02:16:06.680

That has already been done will perform.

946 "Gay Jones" (2652174336)

02:16:06.680 --> 02:16:12.980

Under real life events is there any real life example? Anywhere?

947 "Gay Jones" (2652174336)

02:16:12.980 --> 02:16:16.640

Where this type of project was successful.

948 "Gay Jones" (2652174336)

02:16:16.640 --> 02:16:29.060

Now, the point concerned about proposed mitigation past experience, given the lack of sustained attention at gristmill as well as revetment area by Sarah park behind Bill griffin's old house.

949 "Gay Jones" (2652174336)

02:16:29.060 --> 02:16:37.070

Does not lend a high degree of confidence in any sustained mitigation reparation project.

950 "Gay Jones" (2652174336)

02:16:37.070 --> 02:16:45.320

Another point the existing islands upstream from how, and what avenues have a role in slowing down flows.

951 "Gay Jones" (2652174336)

02:16:45.320 --> 02:16:48.950

Where is this discussed in the course report?

952 "Gay Jones" (2652174336)

02:16:48.950 --> 02:16:58.670

For example, the barrier islands of the East Coast of us have displayed effective impacts on reducing shoreline erosion.

953 "Gay Jones" (2652174336)

02:16:58.670 --> 02:17:11.576

Peers, it's very similar here. Last point at the very least a significant at the very, very least a significant extension of the comment. Period is needed. Thank you.

954 "Keleigh Duey" (1771176192)

02:17:11.576 --> 02:17:19.520

Me for any questions, thank you. Okay. I'm going to go to Elton.

955 "Keleigh Duey" (1771176192)

02:17:19.520 --> 02:17:23.300

Our crew.

956 "Keleigh Duey" (1771176192)
02:17:23.300 --> 02:17:32.868
Or miss do we, can you hear me? I can.

957 "Elton Grau" (2650010112)
02:17:32.868 --> 02:17:43.280
Here you now speak a little louder, though please no problem either. I'm I live right off the American river 2 thoughts. Thought number 1 is.

958 "Elton Grau" (2650010112)
02:17:43.280 --> 02:17:51.920
Mystery, you've been great the last 2 hearings or meetings that we had. And 1 of the things I've enjoyed is the fact that on your video, you have.

959 "Elton Grau" (2650010112)
02:17:51.920 --> 02:17:58.370
These this beautiful woodland right behind you right? And what was interesting and I find it kind of more like.

94

960 "Elton Grau" (2650010112)
02:17:58.370 --> 02:18:07.220
Satirical, maybe that that's the background all of us have, and on the American river, right? We have this beautiful forest behind there with that. We can walk.

961 "Elton Grau" (2650010112)
02:18:07.220 --> 02:18:23.540
We can jog, we can run, we can have a breakdown at times and have conversations with our partners. We can enjoy this nature. And what the core is trying to do right now is to eradicate that nature, destroy those trees.

962 "Elton Grau" (2650010112)
02:18:23.540 --> 02:18:36.380
Or a project that we're all kind of going is it necessary to do all those things at such a level where we are changing the habitat? We are changing the fundamental look.

963 "Elton Grau" (2650010112)
02:18:36.380 --> 02:18:41.570
Of that American river in this location and I hate talking about my job.

964 "Elton Grau" (2650010112)
02:18:41.570 --> 02:18:48.620
But the 2nd point that I wanted to make is a more important point, which is due process. I'm a prosecutor county.

965 "Elton Grau" (2650010112)
02:18:48.620 --> 02:18:52.970
And before I can prosecute them, or I can, we can punish them.

966 "Elton Grau" (2650010112)
02:18:52.970 --> 02:18:56.810

They have a right to see the evidence that people have.

967 "Elton Grau" (2650010112)

02:18:56.810 --> 02:19:02.840

Look at that evidence to question that evidence to study that evidence and to question me.

968 "Elton Grau" (2650010112)

02:19:02.840 --> 02:19:11.630

And the 1 thing the core hasn't done is this ability to give us this 900 page report within the last, what? Maybe month or so.

969 "Elton Grau" (2650010112)

02:19:11.630 --> 02:19:17.660

And all of us are going through it and let me say this, it is a miracle that we have engineers.

970 "Elton Grau" (2650010112)

02:19:17.660 --> 02:19:24.080

That we have biologists that we have therapists that we have people who have looked at this project and.

971 "Elton Grau" (2650010112)

02:19:24.080 --> 02:19:29.750

Kind of analyzed it because in reality we're being forced to look at this project and it's been accepted.

972 "Elton Grau" (2650010112)

02:19:29.750 --> 02:19:45.560

And it doesn't work, you know, when you look at it, when you analyze it, when you look at what they're claiming, I don't think it's there. And that's why, when I bring back, the idea of due process is we need an ability to speak to these engineers to speak with these various people that have signed.

973 "Elton Grau" (2650010112)

02:19:45.560 --> 02:19:51.710

Hey, it's necessary to do something like this. And now I'm not saying, because I'm not a scientist. I'm not an engineer.

974 "Elton Grau" (2650010112)

02:19:51.710 --> 02:19:54.980

I'm a dude that goes up to the court and I make an argument.

975 "Elton Grau" (2650010112)

02:19:54.980 --> 02:19:59.630

And the argument that I think that's necessary right now to make is this simple point.

976 "Elton Grau" (2650010112)

02:19:59.630 --> 02:20:08.000

95 We don't have due process. We haven't had an ability to analyze this project and actually say, is it necessary? And in the conclusions that the core is made.

977 "Elton Grau" (2650010112)

02:20:08.000 --> 02:20:27.740

They're not backed by the science that we are bringing into this analysis and with that, I'm gonna close with this. Really simple point. Everybody who's been on this last 2 nights have been incredible. They've showed passion. They showed knowledge. They showed it an understanding of the science and what the core is about to do it is eradicate.

978 "Elton Grau" (2650010112)

02:20:27.740 --> 02:20:31.520

The national, like the natural habitat of birds.

979 "Elton Grau" (2650010112)

02:20:31.520 --> 02:20:35.570

Dears of turtles.

980 "Elton Grau" (2650010112)

02:20:35.570 --> 02:20:55.865

waterbirds fly and birds you name it it's changing the skunk. The raccoons it's all going to change for them and all because of an idea of erosion control. That. None of us really kind of appreciate and understand. And that the court isn't even willing to sit down and have a conversation with us. And with that.

981 "Keleigh Duey" (1771176192)

02:20:55.865 --> 02:21:03.920

I kind of rest Thank you, Elton. See um.

982 "Keleigh Duey" (1771176192)

02:21:03.920 --> 02:21:10.850

Carrie next. Oh, I'm sorry. You.

983 "Carey Knecht" (3670544128)

02:21:10.850 --> 02:21:28.780

Pretty unmuted and I muted you again. Sorry? Hi. Yeah. Okay. Good evening. Well, thank you for staying late with all of us. Um, I'm very glad at the outset, you mentioned that there were members of the Safeco board here and I really appreciate that and also would like to.

984 "Carey Knecht" (3670544128)

02:21:28.780 --> 02:21:48.780

The suggestion made early on that we do have an in person meeting 1 that involves safety, you know, all of the decision makers here because I think it's really important to have this conversation with folks who are local and who really understand the value of this river. And how it stretches far beyond.

985 "Carey Knecht" (3670544128)

02:21:48.780 --> 02:22:08.780

You know, those of us who live in the neighborhood, I spoke last time about how I see so many families out there, swimming, rafting, fishing and, you know, we walk the stretch as well. My son and I have to say, we studiously avoid the section with rap. We go up and around it because it's just so unpleasant on that.

986 "Carey Knecht" (3670544128)

02:22:08.780 --> 02:22:28.780

So, I would suggest and request that you hold that public workshop, not just with staff, but with board members, and in advance that There'll be broader outreach. I would really like to see posters up at larchmont park for all the soccer families that come out there. I'd like to see posters on all the.

987 "Carey Knecht" (3670544128)

02:22:28.780 --> 02:22:51.700

Says to the parkway, there's so many places where those of us those who didn't get postcards may not know how their lives are about to be impacted for years or decades to come. You could also do TV news outreach. I mean, the pest control district regularly gets media coverage for their mosquito updates. So I'm sure this plan would be something the media would be really interested in.

988 "Carey Knecht" (3670544128)

02:22:51.700 --> 02:23:13.150

I personally look forward to reading those thousands of pages and hope that you provide an extension because, you know, I'd really like to learn more about the air toxins. I'm concerned because I have 1 child at early wine, and another child who's too young, but we'll be entering kindergarten and I go there regularly at lunchtime and I see every day.

989 "Carey Knecht" (3670544128)

02:23:13.150 --> 02:23:33.150

There's hundreds of children out there, and I hope you can as f*** you can think of your children, your grandchildren, maybe yourself at ages 5 and 6, when you're in the playground and think about, you know, from the flag pole of early wine in my younger years. I probably could have thrown a softball and hit this area where you're proposing to have all of this extensive equipment.

990 "Carey Knecht" (3670544128)

02:23:33.150 --> 02:23:53.150

Staging, so I think it's going to have an enormous impact on the neighborhood and on all of those children, and I'm really interested in concern to learn more about what all of those health repercussions could be for those little bodies running around the playground. They have a Jonathan and you just see them panting and it really concerns me to think about what they could be breathing in the.

991 "Carey Knecht" (3670544128)

02:23:53.150 --> 02:23:57.826

Long term impacts that could have on their health. So thank you for your time this evening and.

992 "Keleigh Duey" (1771176192)

02:23:57.826 --> 02:24:06.950

And I look forward to learning more Thank you, Jerry. I'm so, I'm not I.

993 "Keleigh Duey" (1771176192)

02:24:06.950 --> 02:24:25.160

I see another hand has been raised. I I know people are trying to get their final comments in I asked that we don't have any new hand's raised. I see. The people you've already commented I've already heard from you, but I would like to hear your final remarks. So go ahead. Pete. Spaulding.

994 "Pete Spaulding" (1927767296)

02:24:29.606 --> 02:24:51.190

Okay, I thought I was going to go last, but that's okay. Hailey. I, I just hope some of the project leadership are on the line tonight, or they'll listen to this because this is not not in my backyard problem.

995 "Pete Spaulding" (1927767296)

02:24:51.190 --> 02:25:03.320

The Parkway is a regional park, it has more visitors per year than Yosemite, national park. What's being done to the parkway?

996 "Pete Spaulding" (1927767296)

02:25:03.320 --> 02:25:23.320

100

Is a direct violation of the American river Parkway plan, and have been representatives on the call tonight from supervisor office and from the American river Parkway Association. And I hope they report back to them because it's it's.

997 "Pete Spaulding" (1927767296)

02:25:23.320 --> 02:25:30.260

Yeah, it's in our backyard, it's in my backyard, but this is not a, not a, not in my backyard problem. This is a.

998 "Pete Spaulding" (1927767296)

02:25:30.260 --> 02:25:34.310

A regional problem, and as Mark Barry pointed out.

999 "Pete Spaulding" (1927767296)

02:25:34.310 --> 02:25:54.310

We're 1 of the few urban areas in the country that has a wild and scenic river that runs right through the middle of the city. So, something like this that goes out and asks for public input of a project of this magnitude is ridiculous.

101

1000 "Pete Spaulding" (1927767296)

02:25:54.310 --> 02:26:14.977

So, I just hope that your leadership will listen to this. Listen to us, we can have an open public meeting at early wine school, right? Next door and and let them listen to what's going on. And when all this is over. I promise I'm going to buy you a bottle of wine. I'm done.

1001 "Keleigh Duey" (1771176192)

02:26:14.977 --> 02:26:21.080

Thanks Pete based on merit.

1002 "Lisa Merritt MD" (3035440384)

02:26:24.379 --> 02:26:33.980

Good evening everybody so I made a beeline to get back here from clinic in the hospital and.

1003 "Lisa Merritt MD" (3035440384)

02:26:33.980 --> 02:26:46.430

Thank you very much for giving us this time because we need some kind of process. There was significant mental health ramifications or just the anticipatory anxiety of what.

1004 "Lisa Merritt MD" (3035440384)

02:26:46.430 --> 02:26:50.150

102

Our community has been thrown into and that should be recognized.

1005 "Lisa Merritt MD" (3035440384)

02:26:50.150 --> 02:27:00.140

This is a public process, and I agree with the attorney Thank you for the due process. So I specialize in catastrophic care. The situation reminds me from a medical standpoint.

1006 "Lisa Merritt MD" (3035440384)

02:27:00.140 --> 02:27:07.070

The importance of properly Pre having and evaluating and coordinating care and communicating to achieve.

1007 "Lisa Merritt MD" (3035440384)

02:27:07.070 --> 02:27:19.130

Optimal outcomes and satisfaction I have a diabetic patient with several with and have amputations, et cetera, but, you know, maybe that an infection you try to work together with vascular, you get the testing, the Labs, et cetera.

1008 "Lisa Merritt MD" (3035440384)

02:27:19.130 --> 02:27:30.080

You're trying to save the limb. Sometimes you can't. That's only after you fully evaluate everything, unless you have an emergency situation, and you do the best you can, and then you try to put them back together as best. You can.

1009 "Lisa Merritt MD" (3035440384)

02:27:30.080 --> 02:27:34.400

Um, no same thing with brain surgery or anything else.

1010 "Lisa Merritt MD" (3035440384)

02:27:34.400 --> 02:27:40.550

But this project, if it were to take it as a medical analogy, would be considered a significant.

1011 "Lisa Merritt MD" (3035440384)

02:27:40.550 --> 02:27:43.730

Just, I mean, this is malpractice.

1012 "Lisa Merritt MD" (3035440384)

02:27:43.730 --> 02:27:47.540

This is not based on, you know, the proper.

1013 "Lisa Merritt MD" (3035440384)

02:27:47.540 --> 02:27:53.030

Evaluation the proper data all of a sudden we're in a rush, there's no threat.

1014 "Lisa Merritt MD" (3035440384)

02:27:53.030 --> 02:27:57.110

There's no immediate threat we've already with stood high levels of water here.

1015 "Lisa Merritt MD" (3035440384)

02:27:57.110 --> 02:28:04.850

It's like amputating, dense, long, established, vegetation and exchange exchange for lo moves sandy soil.

1016 "Lisa Merritt MD" (3035440384)

02:28:04.850 --> 02:28:13.100

Based on a founding Pre assessment, it's not even properly examining the patient beforehand saying, well, I think we should just cut this out. It'll be better like this, you know.

1017 "Lisa Merritt MD" (3035440384)

02:28:13.100 --> 02:28:22.280

That's very, very, um, not not what we'd like to see happening is something of this magnitude of what's at stake here.

1018 "Lisa Merritt MD" (3035440384)

02:28:22.280 --> 02:28:36.980

This is significant. There was a doctor approaching this. We moved our license. I've worked, I'm licensing 8 States. I worked across this pandemic across this whole thing on the front lines, and we had to work together. We had to work hard and fast of Saint Pete.

1019 "Lisa Merritt MD" (3035440384)

02:28:36.980 --> 02:28:46.280

And it was tough, but we did that because we pulled together and we use the available information. We exchange it and worked on across the world as best. We could.

1020 "Lisa Merritt MD" (3035440384)

02:28:46.280 --> 02:28:53.810

Army Corps of Engineers has been given lots of information has been faced in this conversation before and it's a power and a money issue and we should just.

1021 "Lisa Merritt MD" (3035440384)

02:28:53.810 --> 02:29:03.350

Put that on the open, what does it take to redirect this? And you can continue to get the funding that wants to be secured for this.

1022 "Lisa Merritt MD" (3035440384)

02:29:03.350 --> 02:29:07.100

And at the same time, feel authoritative by me, turning to your own.

1023 "Lisa Merritt MD" (3035440384)

02:29:07.100 --> 02:29:15.080

Data and using it properly, you know, I mean, there's things like like, when was the last time that there was any overlapping.

1024 "Lisa Merritt MD" (3035440384)

02:29:15.080 --> 02:29:23.000

I don't think ever in this area, when you look at the velocity flow measures and things, it's like, if I were to have the vast decision.

1025 "Lisa Merritt MD" (3035440384)

02:29:23.000 --> 02:29:27.080

So that there's good blood supply, would I tell them to go ahead and cut the leg off now?

1026 "Lisa Merritt MD" (3035440384)

02:29:27.080 --> 02:29:32.900

We, we, we have the person we have to couple tools, but we'd, we have that leg.

1027 "Lisa Merritt MD" (3035440384)

02:29:32.900 --> 02:29:39.680

Okay, and when we look at this, we know that there have been the scientific reports showing that vegetation.

1028 "Lisa Merritt MD" (3035440384)

02:29:39.680 --> 02:29:47.000

Helps, why are we having this contradiction in terms? Sponsoring? The vegetation is a risk. What what's this about?

1029 "Lisa Merritt MD" (3035440384)

02:29:47.000 --> 02:29:52.520

I believe I believe I'm concerned and we know the water temperature is a real issue.

1030 "Lisa Merritt MD" (3035440384)

02:29:52.520 --> 02:29:55.520

And we're going to deny this and climate change and.

1031 "Lisa Merritt MD" (3035440384)

02:29:55.520 --> 02:30:15.520

Air quality issues, and I have a daughter who you heard speak by eloquently has health issues. People in my neighborhood have health issues. We have young children at that school that was raised earlier. They're just supposed to be collateral damage for this. Nope, this wonderful noble project. That's not even indicated again, that's not.

1032 "Lisa Merritt MD" (3035440384)

02:30:15.520 --> 02:30:23.780

Practice public health malpractice, so I really want to understand this and I wonder why are they hiding them while they putting you guys up in front.

1033 "Lisa Merritt MD" (3035440384)

02:30:23.780 --> 02:30:28.280

If it's with such confidence and such swagger, then come on out and tell us then.

1034 "Lisa Merritt MD" (3035440384)

02:30:28.280 --> 02:30:33.410

Explain this to me. Okay, that's what I want to really know.

1035 "Lisa Merritt MD" (3035440384)

02:30:33.410 --> 02:30:41.690

As a clinician I stand by what I say, when I say something I sit and talk with people until we're all the same level of understanding this 1st do no harm.

1036 "Lisa Merritt MD" (3035440384)

02:30:41.690 --> 02:30:45.500

That's the standard well, 2 engineers, my father was an engineer.

1037 "Lisa Merritt MD" (3035440384)

02:30:45.500 --> 02:30:52.850

He raised me well, and that's why it's over 3 and a half decades ago. I assess this area and I knew it to be safe. And I chose this home.

1038 "Lisa Merritt MD" (3035440384)

02:30:52.850 --> 02:30:56.750

And it has been, and it's a beautiful community. We have a blues on here.

1039 "Lisa Merritt MD" (3035440384)

02:30:56.750 --> 02:31:06.650

The balanced community, and there's a lot of love in this room and that's why there's so much concern because we understand what we experienced the magic here and we don't want it to get destroyed.

1040 "Lisa Merritt MD" (3035440384)

02:31:06.650 --> 02:31:10.370

Especially not for justifiable reason.

1041 "Lisa Merritt MD" (3035440384)

02:31:10.370 --> 02:31:14.090

So, the service surgery, thank you.

1042 "Lisa Merritt MD" (3035440384)

02:31:14.090 --> 02:31:24.395

But I love the analogy of the surgical approach so let's try to be targeted. Let's go back to the barges. Let's let's go back to the drawing board together and let's come on over and visit. You're gonna really like it here.

1043 "Keleigh Duey" (1771176192)

02:31:24.395 --> 02:31:27.980

You like us we're really nice. Thank you.

1044 "Keleigh Duey" (1771176192)

02:31:27.980 --> 02:31:32.300

Um, I have 1 more hand up Brenda.

1045 "Brenda Gustin" (2711304960)

02:31:39.869 --> 02:32:02.380

A couple of years doing my best and so have some others to talk with U. S Army Corps of engineers about the flood weigh, um, up river. And the thing that I don't understand that people do here is we district ourselves and we segment and.

1046 "Brenda Gustin" (2711304960)

02:32:02.380 --> 02:32:22.380

Uh, we have a reduction this model that we're working with here and yet the river is contiguous, it runs, and all of the animals that live alongside it and live INS in the river. They, they don't see districts separating us. So I haven't understood. Why the U. S, army care.

1047 "Brenda Gustin" (2711304960)

02:32:22.380 --> 02:32:31.820

Engineers central Valley, flood, protection agency. Safe are all of us aren't working together with the community.

1048 "Brenda Gustin" (2711304960)

02:32:31.820 --> 02:32:48.590

And why is it that the U s, Army Corps of engineers couldn't or wouldn't weigh in on a flood way just up river and protect it? That is the central valley flood protection agencies designated.

1049 "Brenda Gustin" (2711304960)

02:32:48.590 --> 02:33:08.590

107

Where nature has already carved out an area, take to take this access flow. And instead, you know, people were, um, you know, considering the idea of building and filling in a flood way because that's something we've done in the past. But to do things that we've done in the past, that we.

1050 "Brenda Gustin" (2711304960)

02:33:08.590 --> 02:33:15.890

Oh, are not wise doesn't make any sense and why don't we take a look at this? Um.

1051 "Brenda Gustin" (2711304960)

02:33:15.890 --> 02:33:27.920

From a community standpoint, all together and see what nature is already created to help us to stay out of harm's way when the water starts to rise.

1052 "Brenda Gustin" (2711304960)

02:33:27.920 --> 02:33:31.190

So, I'll stop there, but.

1053 "Brenda Gustin" (2711304960)

02:33:31.190 --> 02:33:47.810

108

Seems to me that we could all work together and I was very disappointed to hear tonight that they don't even have a way into extend the public comment uh, past tonight or past the February. 5th. I think that's very short sighted.

1054 "Brenda Gustin" (2711304960)

02:33:47.810 --> 02:33:52.610

Thank you very much though, for what you're doing to facilitate tonight.

1055 "Brenda Gustin" (2711304960)

02:33:52.610 --> 02:33:57.510

109

And, uh, I do hope that we will we'll be able to have a public meeting and.

1056 "Keleigh Duey" (1771176192)

02:33:57.510 --> 02:33:59.090

Person, thank you.

1057 "Keleigh Duey" (1771176192)

02:33:59.090 --> 02:34:19.090

Thanks, Brenda. So that wraps up the public participation portion of the evening. I, um, I really appreciate all of you being here. Um, all of these words are not lost. Um, they're not just in 1 ear out the other. We do have leadership on the meeting. We do have all members of.

1058 "Keleigh Duey" (1771176192)

02:34:19.090 --> 02:34:36.680

All of the project proponents on the meeting, it's not just U. S Army Corps of engineers. Um, it's not just federal. It's local state. All the agencies are here listening to these concerns and we hope that this is just the start of our public outreach.

1059 "Keleigh Duey" (1771176192)

02:34:36.680 --> 02:34:55.790

You know, there's a lot more that we realize, um, can be done. Um, we do see, like, um, your emails in the chat and your phone name's on the chat. Um, if you email us with your written comments, um, we'll have a better record of your email. So that you can be put on any notification lists in the future. Um, we have been putting, um.

1060 "Keleigh Duey" (1771176192)

02:34:55.790 --> 02:35:01.550

The emails in the chat, so that you can email us directly. Um.

1061 "Keleigh Duey" (1771176192)

02:35:01.550 --> 02:35:21.550

We see those every day coming in like I said at the beginning, but I'll say it again. Um, in case, you miss the portion we have been receiving, um, a lot of comments regarding extension of the public comment, period. Um, a decision has not yet been made, but it is, um, it has to go up through the chain and it has to be.

1062 "Keleigh Duey" (1771176192)

02:35:21.550 --> 02:35:41.550

Um, you know, it's it's not just I can decide tonight. Um, all of these comments are being considered, um, and will make stronger argument of course, um, for leadership to make that decision. So, once that's decided, I was told this morning that, um, that we hope to have an answer next week.

1063 "Keleigh Duey" (1771176192)

02:35:41.550 --> 02:36:01.550

That will be posted on Saturday the upgrades if that extension is granted and how many days um, um, that would include and I, you know, if a new, um, end date, um, for, for accepting comments, would be included with that. And then everyone who, um, who has asked for an extension would be notified. Um.

1064 "Keleigh Duey" (1771176192)

02:36:01.550 --> 02:36:05.870

Via email, um, as we've received them already, so.

1065 "Keleigh Duey" (1771176192)

02:36:05.870 --> 02:36:25.870

I think that that wraps it up for me. Um, once again, all of these comments will be included in a final document. Um, and they will have responses from our huge inter, disciplinary team. Um, not just myself. I'm a, a biologist by education, but they will.

1066 "Keleigh Duey" (1771176192)

02:36:25.870 --> 02:36:45.870

Be directed to our subject matter experts like our hydraulic engineers. Maybe you have a civil engineering question, the people who deal with erosion protection measures and why is this the best for this area? You will have answers for your comment. I'm sorry that we can't get you those answers tonight, but you will get if those.

1067 "Keleigh Duey" (1771176192)

02:36:45.870 --> 02:36:56.240

Answers and you will see them in writing and they'll be long. Um, and everyone will get the answer they deserve. Um, but I'm sorry that we couldn't give them to you tonight. Um.

1068 "Keleigh Duey" (1771176192)

02:36:56.240 --> 02:37:07.490

I think that's all that I have. I really appreciate everyone. Everyone, um, just spoke beautifully. Um, everyone had so many important comments. You really pulled on my heart strings. Um.

1069 "Keleigh Duey" (1771176192)

02:37:07.490 --> 02:37:18.710

So, thank you very much for your time. I put any last comments in the chat. We'll leave it open for a few more minutes. Thank you for attending. And I hope you have a great evening.

1070 "Keleigh Duey" (1771176192)

02:38:27.680 --> 02:38:32.780

Okay, um, that's not what I wanted.

Chat

joshua thomas

18:09

- 1 | Why is the Contract 3B project such a surprise to everybody in my neighborhood and everyone I know in other neighborhoods along or nearby the river upstream of Howe Avenue, on either side of the river? I know hundreds of people around here and it's a devastating surprise to everyone I've talked to. Could a calculation be made for the ratio of funding spent on outreach vs the overall cost of the project?

Jeanne

18:09

Looks like Chat has been fixed!

Bailey Hunter

18:09

Hello everyone. The chat is open now

Brenda Gustin

18:10

Thank you for solving the chat box issue.

Wendy Slepian

18:10

- 2 | What agency is driving these mitigation efforts? Is it tied to National Flood Insurance?

Matt Carr

18:10

- 3 | Do we need to sign up to comment this evening? I'd like to make a brief oral comment and follow up by letter.

joshua thomas

18:10

- 4 | Those pictures of re-vegetation are not relevant here. The revetments installed in 2001 near Sac state were cobblestones, which trees can grow around. The revetments for their current projects, including Contract 3b, uses large, jagged rocks that trees can't grow around.

Maury Wiseman

18:10

5

Larchmont Park, Manlove Water Station (area between Watt & Waterton) as well as the areas off American River Drive are all deemed "Staging areas". These areas back up to houses. What analysis has been done for ground pollution, structural/pool damage, and impact on children and residents with compromised health issues? In addition to air and noise pollution, can you please address these issues specifically for those of us with these staging areas literally in our backyard.

C Duke

18:11

6

The draft SEIS-SEIR mentions USACE holding meetings and public hearings to gather questions. We're aware there are two public presentations with brief question and answer periods. When and where will the public hearing or public hearings be and how long will they be?

joshua thomas

18:12

7

According to the Geotechnical Report, the planting benches will collapse when the rock trenches and toes launch. What is USACE's plan to mitigate for lost planting benches if the rock toes and trenches launch?

Daniel Airola

18:12

8

Add Oak Meadow Park to the staging areas in neighborhoods. Use of park areas backing up to residences is highly disruptive and poses effects from dusk, air quality, and noise.

joshua thomas

18:13

9

This SEIR is very misleading. If the Contract 3B project is just for American River erosion control, why are Sacramento levees and seepage mentioned in the Purpose and Need section of the draft SEIS-SEIR for an American River erosion control project about ten river miles away from its intersection with the Sacramento River? Shouldn't the Purpose and Need of a NEPA project accurately reflect the location and nature of work being performed? That gross inaccuracy caused confusion and influences me to think the whole project was rushed and that the project was designed as a one size fits all project. Was this section just cut and paste from the main EIS?

Keleigh Duey

18:13

We will have some instructions after this pre-recorded presentation on how to participate. You do not need to sign up in the chat.

Barbara Leary

18:13

- 10 | Not only are greenhouse gas emissions being increased by the need for heavy equipment use, particularly along the 3B section, GHG sequestration is going to be significantly hampered by the loss of hundreds of native trees.

Daniel Airola

18:14

- 11 | The Corps has received numerous requests for extension of the comment deadline, which is justified mostly by the timing of release of the document, the lack of an index for Appendix B which inhibits review, and the overall poor quality of the analysis and thus the effort required to comment. Please heed these numerous requests.

Eric

18:14

- 12 | I would like an extremely clear explanation and description of the bike trail closures and detours around Hwy 160. This is the daily commute for some of us.

Daniel Kay

18:14

- 13 | Bailey please repeat 3B that may answer my question new people are joining in and i could not hear please and thank. Will the surge zone on waterton way be a material staging area? can we have an enlarged 3B map please I live on waterton way and my back yard touches the waterton pump area / surge area /park

Daniel

18:14

I agree, Barbara

Andrea Willey, MD

18:14

- 14 | This mitigation site is inadequate. Displacing miles of riparian habitat and providing a single area is not feasible. Will not provide protection and shelter adequate to support the wildlife and waterbirds.

Chris Enright

18:15

- 15 | Please explain how the piezometer network indicates project performance. Please provide citations of scientific analysis of this PM method in other locations.

joshua thomas

18:15

16

For such a large proportion of the treasured Lower American Parkway's riparian habitat and recreation area to be removed, why, long ago, were informational bulletin boards describing the proposed action not displayed on a long term basis at the parking lot areas where they'd be easily noticed by users of and residents near the Lower American Parkway?

David O'Connor

18:15

17

I'm a California-licensed geologist, professional hydrologist currently with BLM-California and have worked as a hydrologist for the Bureau of Reclamation and the California Nevada River Forecast Center, and am familiar with erosion control projects and the NEPA process. I've spent some considerable time with the planning documents and I'm no way convinced the erosion control features are appropriate, based on a complete lack of sufficient characterization of the geology or mining deposits, nonexistent documentation of the 2D hydraulic model, and likelihood that the 2D model is incapable of representing the distribution of velocity at 160kcfs in a post project condition. The project does not appear to be safe for the public, and erosion may easily worsen. Much more modern tools need to be used and much more analysis needs to happen. This does very much look a one-size-fits-all project applied to the whole American River.

Michelle Stevens

18:15

18

The loss of mature riparian forest and heritage oaks and other trees are not replaceable in decades. The habitat corridor is already severely damaged by wildfires, unhoused persons encampment, and other activities along the river corridor. There is far more species diversity than Federally listed species as Threatened and Endangered. Also NW pond turtles are submitted for listing as threatened and both green and white sturgeon.

Brenda Gustin

18:15

Agree with Barbara Leary.

Brenda Gustin

18:15

Agree with Daniel Airola.

Alan Abbs

18:15

19

If there are NOx and GHG as air quality impacts from the construction, wouldn't there also be dust impacts (PM10), and fine particulate (PM2.5) and Diesel Particulate Matter (a toxic air contaminant) from the construction as well?

Barbara Leary

18:15

- 20 | Agree with Dan Airola as well. The LOSS of carbon sequestration must be accounted for in the environmental analysis.

William Avery

18:16

- 21 | What data suggest that levees in reach 4-1, area for C3B, are at the highest risk in the Sacramento area? The GRR geotechnical report suggest that of all index points analyzed for the American River Common Features Project this reach had levees that had the least risk.

David O'Connor

18:16

- 22 | Since the EIR was signed, there have been catastrophic failures of similarly planned revetments that were based on simplified, 2D hydraulic models such as is relied on principally in this project. With hydraulic channel output model output so foundational to the analysis, to predict water velocity in the river and in an around complex three dimensional objects like large trees, either before or after project design, how can the USACE not use modern three dimensional hydraulic flow models, that are now commonplace and very affordable, and continue to rely on a very simple flow model developed in 2004?

Mikkel Herholdt Jensen

18:16

- 23 | the mitigation sites are also an environmental justice issue; destroying the habitat in our area and recreating it elsewhere is still a serious loss to the Larchmont neighborhood (not to mention the impact it will have on the wildlife)

Jon

18:16

- 24 | How is this supposed to be a flood mitigation project? My understanding is vegetation and trees help absorb and prevent floods. How does it help to remove vegetation, as I see has been done at River Park, to prevent flooding? The site appears to be much more susceptible to flooding now than before the vegetation removal? It doesn't make sense.

Jaime

18:16

- 25 | With such a wide range of type of water bodies, including ponds, creeks, a major river, and a wide range of proposed actions, including levee widening, canal and slope modification, levee extension, culverts, launchable trenches, launchable toes, tie backs, bank protection/revetment, etc, how can the vastly different work be justified to be lumped into one EIS and be called "Common"? With this approach, reviewing the document and the proposed actions' impacts are next to impossible, given the many

thousands of report and referenced report pages, and what seems like hundreds of report references, all for different project areas?

Bailey Hunter

18:16

Hi everyone, we understand the image quality of the presentation is poor. These maps are available in the SEIS in chapter 3 (pages 3-13 to 3-107)

Andrea Willey, MD

18:17

Agree with Jon

Marion Millin

18:17

26

Destroying every inch of the original riparian habitat and every living creature there is much greater impact than "aesthetic and visual." Clearcutting and mitigation or "replanting" will never replace what has been destroyed.

Bailey Hunter

18:17

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/SEIS-SEIR/ARCF_Draft-SEIS-SEIR_Dec2023.pdf?ver=AO3ouyT-D15CF8wpXMACuQ%3d%3d Here is a link to the SEIS

David O'Connor

18:17

27

Is the USACE aware of this recent paper that became available after the EIR was published: Flora et al 2021, On impact of bed bathymetry resolution on the flood flow field of the lower American River, Ca, insights gained using data-driven, Large-Eddy simulation, which concludes:

"While trees appear to increase turbulent fluctuations near the bank, these fluctuations probably do not contribute to erosion process".

Mikkel Herholdt Jensen

18:18

28

Jon: according to the USACE, vegetated banks can protect against 6-7 feet per second mean channel flows. In their 2017 Lower American River Streambank Erosion Monitoring Report, the modeled flows did not appear to exceed this, so the removal of vegetation is baffling.

Andrea Willey, MD

18:18

this! “While trees appear to increase turbulent fluctuations near the bank, these fluctuations probably do no contribute to erosion process”.

Mikkel Herholdt Jensen

18:18

29 | I read through the 2017 report, and the current plan is entirely going against the recommendations in the report

David O'Connor

18:18

30 | Is the USACE aware of this recent paper that became available after the EIR was published: Flora & Khosonejad 2023. Uncertainty quantification of bank vegetation impacts on the flood flow field in the American River, Ca, using large-eddy simulations”, which concludes”, “Our analysis revealed that the most significant uncertainty in depth-averaged velocity magnitudes was observed near the channel banks”. With this information, how can the USACE continue to rely on not only a model developed in 2004, but a 2D model that is very likely wholly inappropriate for evaluating flow at these extreme levels or helping design what engineering solutions might work?

Matt Carr

18:18

31 | The SEIS does not discuss the effects of MILES of riprap along the river, destroying miles of natural shoreline including beaches. The analysis is deficient to the extent it utterly fails to consider aesthetic and recreational impacts generated by miles of riprap. This is but one issue with the SEIS, but it is a huge one.

Eric

18:18

You are correct Marion Millin.

David O'Connor

18:19

32 | NEPA planning documents from other major water projects with significant hydraulic and/or hydrologic modeling components from other major water management agencies, such as the Bureau of Reclamation or Department of Water Resources, have details of the modeling framework and assumptions clearly defined and discussed in their NEPA documents, as well as model results discussed substantively and even model files made available for download, for the public to inspect if desired. In this project's case, none such information is provided or made available and the public is forced to accept the results of a “black box” model. Why is this project so different and how is the complete lack of transparency allowed under California and federal law?

Jon

18:19

33

I strongly encourage an in-person community meeting. Between the delay in presentation beginning, the chat disfunction, the audio feedback, the small images, this is a very bad way for a community to be informed by a very disruptive, costly, and potentially unnecessary public project.

Bev

18:19

34

35

Has a hydrologic modeling been done for the 3B section of the American River. I would like to see this modeling , please. Also, why is there work starting on 3B South when these meetings are only being held now?

Lisa Merritt MD

18:19

36

Why is the soil that is there "unsuitable" for re use? Clays vs the sand that is there and will wash away. Filling in the pond where water birds need to escape predators, nest calmly, etc If soil and vegetation are not removed, there would be no need for "available land" for habitat disruption, now called "mitigation", if optimal mitigation would require more land and funding to be equivalent, why not reduce scope of the project in order to optimally mitigate the habit destruction. Wouldnt Carbon Green Credits help offset the costs?

David O'Connor

18:19

37

With significant potential change in channel geometry after high flows, and considering our recent history of a historic flood releases in WY17 (82 kcfs), which certainly eroded and deposited sediment in new areas, when was the digital elevation surface for the digital channel bottom constructed, and if it was pre WY2017, how can the model results still be considered accurate? Similarly, what year assumptions for channel roughness were used in the main hydraulic model?

Mikkel Herholdt Jensen

18:20

38

Bev: there is some modeling done for this stretch (there was a 2017 report which I read through); however, this report did not recommend the current erosion control measures currently part of Project 3B

Kate Rosenlieb

18:20

<https://www.cbsnews.com/sacramento/video/american-river-flooding-plan-receives-pushback-from-community-group/#x>

amy

18:20

Agree with Jon also

Pete Spaulding

18:20

39

The piezometer network should have been installed first in 2016 and then use that data to determine project needs and hot spots. You are doing this backwards!

Lisa Merritt MD

18:21

40

The cultural resources person could not make either meeting??

David O'Connor

18:21

41

The modeling documentation was not provided and no modelling assumptions were described. Can you describe what kinds of uncertainty analyses accompanied development of the hydraulic channel model (the 2d flow), and whether uncertainty in the three dimensional distribution of the soil model (the geology) was taken into account together the uncertainty in velocity, for an overall uncertainty analysis of erodibility potential?

David O'Connor

18:22

42

The most commonly referenced hydraulic modeling identified for the project is from 2004. Even if there have been substantive changes made to it since then, does the USACE consider use of a model developed originally two decades ago appropriate in being a foundational piece of a project on some portion of a billion dollar scale that has major flood control and habitat destruction components, and 20 yrs of scientific and engineering advancements have occurred?

amy

18:22

Agree with Marion also

David O'Connor

18:22

43

I've heard that engineers/hydrologists at USACE and at other state and federal resource agencies don't consider this a "good project" and that "we're going back in time". Have any of the project's project managers heard any types of negative discussion like this?

Maury Wiseman

18:22

Agree with Jon

Keleigh Duey

18:22

Please submit your written comments to: ARCF_SEIS@usace.army.mil and
PublicCommentARCF16@water.ca.gov

Lisa Merritt MD

18:22

44

Comments from WHOM? in 2022? None of us was made aware of ANY of this until the same day the comment period was opening, 12.22.2023

David O'Connor

18:23

45

For the total approximate expense of this project, how does the relative outreach and public participation component compare with comparable USACE projects with combined channel protection improvements and mature riparian forest removal in other major urban areas across the country?

Eric

18:23

Agree with Dr. Merritt

Joe O'Connor

18:23

46

This is a large complicated project of interest to large numbers of people and some of the review and comment period occurred over Holidays when many were involved in Holiday matters. I believe the review and comment period should be extended beyond 5 February.

David O'Connor

18:23

47

How can the USACE consider they've done enough outreach to meet NEPA's intentions or requirements when only an extremely low percentage of people adjacent to or nearby the project footprint, in a major urban area, is aware of the project? And for that low percentage, nearly everybody has only become aware of the project during or shortly after the Dec/Jan holiday period.

Maury Wiseman

18:23

Agree with Dr. Merritt

Chris Enright

18:23

48

The designation of project “reaches” is vague. They appear to represent administrative convenience more than actual erosion potential sites. Erosion potential sites are on the order of tens of meters. “Reaches” have been designated that are hundreds of meters wide. This scale has little to do with the scale of erosion vulnerable areas that are much smaller. Please redefine “reaches” to scale properly with the actual erosion risk environment.

Maury Wiseman

18:23

Comments are acceptable in all public forums.

Jon

18:24

49

Do we anticipate this project needing to be repeated in 20 years again, per the earlier work from 2001?

David O'Connor

18:24

50

What social media strategies did USACE use to attempt to properly notify the public of the proposed action during each of the project stages? Does USACE headquarters verify that the public outreach at the districts are meeting national CEQ or agency goals?

Pete Spaulding

18:24

51

How can construction on contract 3B begin in summer, before you get CEQA approval?

Matt Carr

18:24

52

As comments are set to start at the time the meeting was set to end, 6:30, this is yet another reason the Corps should schedule an in-person meeting.

mike

18:24

53

Please extend the comment period at least 30 days.

Andrea Willey, MD

18:24

54

if you were to proceed with this you need ot make the mitigation site first! where will the wildlife go for a few years until you do it!

Maury Wiseman

18:24

Agree with Matt

David O'Connor

18:24

55

Bureau of Reclamation operates Folsom and Nimbus Dams and jointly makes most release decisions for both reservoirs. Even though Bureau of Reclamation isn't charged with channel construction improvement responsibility like USACE, they likely have important information from stakeholders of problem or suspected problem areas identified during large flood release. Why is Bureau of Reclamation not a cooperating federal agency on this project?

joshua thomas

18:25

56

The 2021 biological opinion of the National Marine Forestry Service recommended that USACE follow the 2017 Central Valley Flood Protection Plan's Conservation Strategy. The Conservation Strategy calls for "adaptive management," which includes monitoring and using new data and studies to adjust methods. USACE does not appear to cite any recent works on erosion since the 2016 GRR. For example, the most recent study of erosion of the Lower American River, the 2017 Lower American River Streambank Erosion Report, is not cited in the 2023 SEIS/SEIR. This report found that erosion was only a problem at river miles 9.8 and 10.5 on the southbank. 9.8 was addressed by the 2011 revetments. For river mile 10.5, the report recommended cobblestone revetments. USACE also does not cite nor take into account the recent vegetation models from Kevin Flora and Ali Khosronejad, which show that on the American River trees prevent erosion by keeping the velocity of flow in the center of a river's channel.

Andrea Willey, MD

18:25

57

Please have an inperson meeting with engineers and other informed persons to address these issues.

amy

18:25

Yes, agree with this Andrea

Joe O'Connor

18:25

58

The beautiful stretch of American River in the Contract 3B area is of major concern to everyone. It would go a long way helping those concerned if they could be convinced that flood protection measures are indeed needed in that area, especially in the Site 4-1 area where the most trees will be removed. So far they aren't close to being convinced. Perhaps the Corps should provide some real explanations demonstrating that imperative. It doesn't have to be too technical. The real fear is large scale wreckage of the Parkway habitat for no real benefit.

Alicia Eastvold

18:25

59

This conversation will need to continue beyond this meeting time. I just joined Save the American River Parkway for this purpose. I encourage others to do the same.
<https://www.facebook.com/groups/353294447441210/>

Lisa Merritt MD

18:26

60

When will we get clarifications to the ## questions raised last week at 1.10.2024 meeting?

Susan Solarz

18:26

I agree with Andrea Willey's comments.

joshua thomas

18:26

61

Why hasn't USACE taken into account any recent works on vegetation or erosion? Doesn't this go against the Central Valley Flood Protection Plan's conservation strategy, which calls for adaptive management?

Marion Millin

18:26

62

It's convenient that the public was never told the truth about the flood of 1986. Now it is being used for scare tactics. Folsom Dam was misoperated when managers had a three-day weekend and ignored the approaching Pineapple Express. Releases made too late and too fast compromised the entire levee system and threatened the community. The new gates in Folsom Dam are lowered to prevent that sort of situation. The Army Corps later raised the levees 3 feet. That system has not been tested under maximum flows. NOW that is the excuse being given to DESTROY THE ORIGINAL IRREPLACEABLE RIPARIAN HABITAT AND ALL THE LIFE IT SUPPORTS.....

Bill Brattain

18:26

63

The erosion work done on the American River by Sac State has turned a lush forest of grass and trees into a barren moonscape. There is loose unprotected soil on the water side of the levee and barren mud with tire ruts on the land side. The tree plantings next to the water appear dead. This is not proper erosion control. If this is what is done on the remaining sections, it a disaster!

Jajuan Francis

18:26

64

We need to have an in person meeting. This is moving too fast without clear communication.

Matt Carr

18:27

65 Please schedule an in-person meeting with sufficient time for Q and A. The fact that this was pre-recorded makes it seem even more like this was done just to "check the box" of public participation.

erik gabele

18:27

66 Maps don't indicate areas which will be off limits to public. Please clearly indicate areas which will be inaccessible. For example, on the north side of Contract 3B, the minimalistic diagrams show construction buffer, and contractor access. Will the north side of the river be inaccessible between Watt Ave and just downstream of Rio Americano HS. There are a lot of hiking trails near the river, but not in the construction area, and there needs to be public access across "contractor access" on the levee road.

Peggy Kennedy

18:27

67 Please pay attention to Mike's request! Destroying the lower American River Parkway as we know it and destroying the carbon sink and species diversity that now exists is not a good response to possible flooding.

Bailey Hunter

18:27

Written comments can be submitted to: ARCF_SEIS@usace.army.mil and
PublicCommentARCF16@water.ca.gov

Tom

18:27

68 I agree with requests for extension of the comment period to allow for further public review, understanding and public input.

joshua thomas

18:27

69 It appears the same erosion protection features are planned for vastly different peak velocity rates: 0-2 and ~10 mph, based on georeferenced figures provided by the public. Why were the erosional protection features not displayed/overlayed in context with the map of peak water velocity in the SEIR?

David O'Connor

18:27

70 | In the FAQ area of the ARCF webpage, the “Don’t trees help prevent erosion” question is answered with about 160 words with no citations. Can citations of modern analysis be provided to give the public more confidence in this statement that is crucial to the Purpose and Need of the project?

Lisa Merritt MD

18:27

71 | So your superiors left you to face the hordes by yourselves again with no technical back up? Shame on them!

David O'Connor

18:27

72 | What type of fluvial deposition model was used as a basis for the stratigraphic correlation, and what types of geophysical logging was relied on most for the stratigraphic correlation?

Jodie

18:28

73 | Can any of those 40 people answer questions this evening?

Marion Millin

18:28

74 | Document Dump the Friday before Christmas. There must be an EXTENSION for public comment.

David O'Connor

18:28

75 | From the cross sections shown, the geologic analysis looks extremely crude. Is there an estimate of the interpolation limits from each boring used to characterize the stratigraphy of the riverbanks? For example, was one 4” diameter borehole used to characterize about each ¼-mile or more of riverbank? What guidance set the density of borings and what level of geologic analysis went into the stratigraphy?

mary

18:28

76 | Is there anyway to save the trees like transplanting them and planting them after construction is done? I mean if you’re going to kill them why not take a chance on saving them

David O'Connor

18:28

77 | If riverbank erosion is the major worry driving the project, and a digital elevation model of the channel exists from LiDAR and Sonar measurements from 2006-2008, why wasn’t the same or similar work conducted post historic flood flows of WY 2017, to difference, to produce a wide scale look to see where erosion and deposition occurred in LiDAR detail?

David O'Connor

18:28

- 78 | Reports were identified that concluded erosion was historically too minimal in this area to be identified in aerial photography. Were any investigations for erosion evidence undertaken using modern, high resolution photogrammetry for pre and post 2017 historic flood flow conditions? If not, why?

Matt Carr

18:28

- 79 | Are you capturing the chats to be considered as formal public comment to which the Corps must respond?

Kate Rosenlieb

18:28

- 80 | Here is the channel 13 news clip that aired at 5:00 pm tonight outlining the community pushback on this project <https://www.cbsnews.com/sacramento/video/american-river-flooding-plan-receives-pushback-from-community-group/#x>

Marion Millin

18:28

And they are Yellow Billed MAGPIES not CUCKOOS

Alicia Eastvold

18:29

- 81 | Kaleigh Duey, I would appreciate understanding the public comment outreach process. When did this occur in 2022 and is there a reason many of us did not know about it? And can you share what influence public comment has on your upcoming decisions?

Jessica Wiseman

18:29

- 82 | When will we be informed of an approved much needed extension to public commentary? The report came out during the holidays/closed offices and additionally an inaccurate email address was listed for the public? When will we have an in person meeting?

Jon

18:29

You meant yellow billed magpies?

David O'Connor

18:29

83 | Lithostratigraphic correlation for conceptual geologic model development is widely being considered insufficient for the conceptualization of three dimensional geologic models, especially when lives, property, and billion dollars of impact are at stake. Was the three dimensional model developed more on a lithostratigraphic or sequence stratigraphic correlation basis?

David O'Connor

18:29

84 | If riverbank erosion is the major worry driving the project, why were so few investigations of riverbank erosion done after the historic flows of WY2017?

Christine Norman

18:29

85 | How much erosion has occurred in the 3b area in the last 10 years.

erik gabele

18:29

86 | It's not the quality of the documents in the presentation alone. They are at such a small scale that we can't adequately see the impact.

Jessica Wiseman

18:30

87 | Where will that public notice be posted?

By mail? Posted physically in the areas affected?

Lisa Merritt MD

18:30

88 | once it is captured and recorded, what happens next? Who will review them or is a synopsis to be made? When will we get answers to the questions and concerns raised, particularly about inconsistencies in the reports and peer review issues and do we need to come down to the USACE offices or perhaps come to washington to raise national attention on how we have been disrespected, our collective intelligence insulted? Where and how have you offered these meetings and why dont ANY OF US KNOW ABOUT THEM?

Daniel Kay

18:30

89 | in person would be great!

Matt Carr

18:30

90 | Agreed with Erik. The maps and such in the presentation and in the SEIS/SEIR are not detailed enough to meaningfully evaluate the proposal.

Brenda Gustin

18:31

91 | Since USACE has not been able to answer questions from the first Public Comment meeting, it makes no sense to move forward without further dialogue from the residents now present. I highly support an extension.

Jessica Wiseman

18:31

92 | Thank you for aspiring toward clear and transparent communication.

David O'Connor

18:31

93 | It appears a very limited amount of on the ground testing was done ahead of this project that involves wide scale destruction of a mature riparian forest and that is foundational to the protection of lives and property? In what year or years were the majority of the ground soil or erosion evaluations done?

Ellen Ganz

18:31

94 | How does this count as a meeting and not a presentation when no questions are answered?

amy

18:31

Exactly and agree Ellen

M B Schwehr

18:31

95 | You mentioned the "slides" were being posted-- does that include the recorded staff audio as well as the visual slides?

mike

18:32

96 | I have used Zoom dozens of times with no problems. I do not recall even using webex, so this may be the first time. It did not go well. Perhaps my lack of previous use was the problem. If it is possible to have the next meeting via Zoom, it may be a best choice for all of us.

Brenda Gustin

18:32

97

I agree with Alicia's request. How is it that the public did not know about the 2022 outreach? And, only 2 days before last week's public comment did local residents receive notification via the mail about the public comment meetings this month.

Daniel Kay

18:32

ellen is right

Gerald Joseph Djuth

18:32

98

Why has USACE only provided 2 design alternatives? There is only no project alternative, and the launchable toe/launchable trench. Biotechnical engineering techniques can control erosion from river

99

velocities up to 12 fps; why have these techniques, which could preserve the riparian habitat, not been considered?

Marion Millin

18:32

it's 2024. Why is clearcutting the only option?

Bailey Hunter

18:33

Both the slides and previously recorded presentation is on sacleveeupgrades.com

Lisa Merritt MD

18:33

100

We would like answers and where will those responses come out, to the "people" who were informed about it in 2022 when we were still in the dark? Please ask the "powers that be" to respect us and inform us and allay significant anxiety and concern I already see causing ill health impacts across generations. Will the leaders of all involved agencies also receive the comments and results/answers/explanations and when? We can send our copies it might help expedite this for you.

erik gabele

18:33

101

How far into the river channel will the launchable toe be placed on the south side of the river between Watt Ave and Mayhew? Images are inadequate no matter what the resolution.

David O'Connor

18:33

102 | I'm a hydrologist for the federal government who is in the loop with many federal water projects like this. The fact that I learned up this upstream work not until December, this late in the project process, speaks to how poor the public involvement component of this project has been.

Rick Sloan

18:33

103 | Is it possible to see an artist's rendering of what this project will look like "Before and After" from the view from the river?

Carey Knecht

18:33

104 | They were noted in the chat because staff said they couldn't get them noted down thoroughly so people needed to submit them in writing

Betsy Weiland

18:34

105 | If the Corps cannot manage an in person public meeting, SAFCA as our local flood control agency needs to organize the meeting.

M B Schwehr

18:35

106 | Diesel particulate is a carcinogen in California and needs to be treated as such under CEQA.

Barbara Leary

18:35

Agree with Betsy.

David O'Connor

18:35

I'm a hydrologist with the federal government who is in the loop with major water projects like this. The fact that I just learned about this project in December speaks to how poor the public involvement component of this process has been.

kathy bradshaw

18:35

107 | It seems to me that this huge amount of disturbance to vegetation along the American River near Watt and Howe so soon after the obliteration of vegetation near Sac State makes is too catastrophic a loss for wildlife and people in this watershed all at once. At the very least, can the timeline be delayed as a way to mitigate for this?

Mark Berry

18:35

108

Thank you for the presentation but it lacks clarity. You do not identify and compare existing conditions with what and why they are to be changed. The offer of conclusory statement does not dispel concerns. Saying that "mitigation" is done is conclusory and does not explain how the mitigation is effective and meets objectives. This presentation is way to overview for public to be genuinely informed.

Daniel Kay

18:35

don't repeat Pete Spaulding

amy

18:35

Yes agree Kathy

Brenda Gustin

18:36

In a virtual meeting, it is important for people to comment on other people's information. It's currently the only way to have dialogue on important projects that appear to be moving forward because the timeline deems it so.

Brenda Gustin

18:36

Thank you Pete.

Laura Davidson

18:36

Thank you, Pete!

Maury Wiseman

18:36

Thank you, Pete.

Michelle Stevens

18:38

109

Absolutely agree with Dan on having a field meeting, esp with those of us with extensive field experience that can speak from expertise.

joshua thomas

18:38

110

In the SEIR figure of construction features, the launchable rock toe features are depicted as being as far as 200-250 ft perpendicularly from the levee in places, past the toe of the berm and nearly in the middle of the channel. Is this an error? Besides the non-protective effect to the channel's berm, won't significant new volume of rock toward the middle of the channel potentially alter the baseflow direction of the river, possibly triggering minor avulsions with unintended erosional consequences, on a long term scale?

Marion Millin

18:38

111

How is this devastation possible on a Wild and Scenic protected river with a recently legislated Lower American River Conservancy?

amy

18:39

I would like to know that as well Marion

Eric

18:39

Agree with Marion.

Marion Millin

18:39

112

After presentation, audio cut out on the questions. Had to call in to hear and missed a lot of it. TOO MANY GLITCHES WITH WEBEX

joshua thomas

18:40

113

For the exact type of construction work and distribution of trees that are planned to be removed, none such location information could be identified in the draft SEIR, as the figures are all at a very zoomed out scale, and appear to be more rough schematics. Detailed topography is not shown but topography and river bank steepness are very different from one site to another.. Aren't more detailed maps showing more accurately what type of work is happening where, required for work of this nature? To give confidence that individual sites were studied closely, many more zoomed in figure are needed for the expansive riverbank area the work is occurring over.

Marion Millin

18:40

Wild and Scenic status locally, State and Federal.

JeffM

18:41

114

As a bicyclist who frequently rides much to all of the length of the bike trail, I'd like to make sure that the Bike Trail is NEVER closed and is always kept in a passable condition. Putting out a press release or posting a closure notice on a website doesn't reach most of the cycling community. That is a highly significant impact of the construction activity.(That's aside from the longer term environmental impacts).

Ellen Ganz

18:41

Agree with Eliza- the trees at the north side of Larchmont park are used for shade and are older trees.

rosie

18:42

115

The problem is that you are working on such a large areas that the impacts on wildlife and vegetation seems greater than it should be. With the other project near Sacramento State, various fires, etc. this watershed is suffering a massive loss of riparian forest. Even though you have identified mitigation measures, they do not really mitigate for that habitat, because they are being done in the same time frame as the action--ie there is temporal loss. Also simply acknowledging that there will be aesthetic impacts until re-establishment is laughable. What you mean is a whole generation will think of the American River is an urban canal. First consider if the gain in safety is worth the destruction of habitat. Second, consider if spreading out bank protection projects in time and making them smaller in scope could achieve the same level of protection without such sizeable disruption.

Eric

18:42

116

JeffM is right. Some of us depend on the bike trail for our daily commute. Throwing up a sign or barricade the day work starts is insufficient notice!

Matt Carr

18:42

117

I would like to request the detailed materials and schematics that were used as a basis to draft the SEIS/SEIR. The public should be able to review this underlying information. Do I need to submit a FOIA request? This could reasonably be construed as one but hopefully you'll just post those materials online ASAP.

Christine Norman

18:43

Great idea about the meeting at the school and a walk about after.

mary

18:43

118 | A hybrid in person/on-line meeting would be valuable

NAH

18:44

119 | how deep is our slurry wall and is it failing?

Ben

18:44

120 | I would also like to submit a vote for an in person meeting, laggy audio, blurry images. As Bill Brattain has said I would like an on foot walk with someone who can show us what this is going to look like rather than these difficult to see, glitchy webex talks

Andrea Willey, MD

18:44

121 | agree with inpreson and on site meeting with engineers and others who have information to respond to concerns

Marion Millin

18:44

122 | The river side next to Larchmont Park is rich with Dutchman's Pipevines that support the endangered Blue Swallowtails. Are those going to be "replanted"?

Mikkel Herholdt Jensen

18:44

123 | I walked past there today; it's already eroding badly on the north side of the river by Sac State. We took a picture of it, it was so shocking.

Mark Berry

18:45

124 | yes we need an inpeson presentation and clarity as to what is really being proposed

Mikkel Herholdt Jensen

18:45

125 | the barren landscape is really not doing erosion control any favors, it would seem

Brenda Gustin

18:45

126 | I agree with Daniel Airola, Bill Brattain and others of us that spoke last time about having a field meeting. Discussing this in person and at the location(s) allows everyone to be in what in this natural habitat is

going to be removed/destroyed and to have USACE show how what is taken away will be restored in less than 15 years. I truly appreciate each of you here on the frontline facilitating this presentation although it is necessary to speak with the specialists we employ at USACE so that questions can be answered in real time.

Marion Millin

18:45

127 | Where is all the WILDLIFE supposed to go?!

Cathy M Birch

18:46

Ditto Brenda!!

Brenda Gustin

18:46

Great idea, Rick Sloan, to see an artist's rendering of "Before and After"

Mikkel Herholdt Jensen

18:46

128 | Daniel: Waterton is going to be used as a staging zone if I read the plan correctly, so yes, be prepared for heavy construction equipment for three years.

rosie

18:46

129 | I absolutely agree with what Rosie said: A whole generation will think of the American River as an urban canal. What a colossal loss for us, this is the jewel of Sacramento, and it would be an eyesore for decades. That is a human impact that is huge.

Matt Carr

18:46

Technical difficulties

Matt Carr

18:47

I'd really like to make a comment about the riprap

Eric

18:47

Rosie is correct. The Corps are the ones that paved the Los Angeles River under the guise of "flood control."

amy

18:47

130

Agree with JeffM. As a runner who frequents the parkway trails, the signage and closures are unacceptable the day before. I also feel like you should be reaching out to the east sac community as well because a lot of people from this area use the parkway near guy west and that area and word about these projects and these forums are not getting out to this community as well. A postcard that went out recently did not go out to us and I only learned about it this past weekend when running on the parkway from someone out there with information.

Matt Carr

18:47

Please come back to me. Thanksl.

Maury Wiseman

18:47

Agree with Danny K

Matt Carr

18:47

This is a bit frustrating. Thanks.

Marion Millin

18:47

Yes and in LA the urban channel is called The Wash.

Mikkel Herholdt Jensen

18:47

to clarify my note about Sac State earlier: the site is eroding *AFTER* USACE cut down all the trees

Brenda Gustin

18:48

131

Yes, to Betsy Weiland's recommendation to have SAFCA, organize an in person meeting.

Alicia Eastvold

18:48

he said to move on....

Matt Carr

18:48

Will do, thanks.

Alicia Eastvold

18:48

and come back to him later.

Matt Carr

18:48

Please move on for now.

Matt Carr

18:48

We have a lot of commenters.

amy

18:48

Marion, the wildlife is a HUGE concern to me as well

Daniel Airola

18:48

Despite all my concerns with the project, the timeline, and the technical glitches we've experienced, I would like to thank and commend the meeting facilitators for their respectful treatment of us public commentors.

Jay Domeny

18:49

I agree. We need to have a qualified person to speak to the public about all technical aspects of the contract. Please hear us. Tia Jay D

Mikkel Herholdt Jensen

18:50

Fully agree, Andrea

JeffM

18:50

Just to add some timely information. Yesterday a group of us rode the entire trail and around the construction area by sac state we had a hard time to figure out which parts were open, which parts were closed and which of the paths we had to detour around. There werem

Ben

18:50

Thank you Andrea, I agree

Barbara Leary

18:50

132

The answer to the question re: where is the wildlife supposed to go needs to be added in the environmental documents. Deer with generational patterns of movement, coyotes, bobcats, birds etc will be driven into the neighborhoods or and onto busy streets as well as out of the region. SAFCA board members were asked at the Water Forum and were asked to host a public in person meeting last month. I am hoping they will act on that request.

Brenda Gustin

18:50

Thank you Andrea!

Laura Davidson

18:50

Thank you Andrea!

Melissa Davis

18:50

Thank you Andrea. Yes!

Cathy M Birch

18:50

Bravo Andrea

Maury Wiseman

18:50

Thank you, Andrea.

mary

18:50

Thank you Andrea!

JeffM

18:51

There weren't signs posted to indicate which way to go in various places

joshua thomas

18:51

133

This is from the 2017 Central Valley Flood Protection Conservation Strategy: Woody vegetation found on and near Central Valley levees is a significant portion of the remaining riparian community that provides nesting, foraging, and cover habitat for migratory birds (including Neotropical migrants, raptors, and others); vegetation on the lower waterside slope of the levee provides overhead cover and shade that moderate water temperatures and energy input to river productivity at all trophic levels and contribute greatly to fish habitat (DWR 2012a). This habitat feature is critically important in protection and recovery efforts for special status species along California's riparian corridors and adjacent waterways, and its loss, particularly the loss of SRA habitat, can result in ecological impacts that are considered essentially "unmitigable" due to the unique nature of this landscape feature.

joshua thomas

18:52

134

Cutting down lower waterside slope vegetation can create ecological impacts that are "essentially unmitigable"

Laura Davidson

18:53

Yes, Dom! Thank you for your comments, and especially those about native americans and how just awful the Sac State area looks now.

Jon

18:53

Eric Guerra is our City Council rep. He tends to be pretty responsive. I encourage folks to let him know how you feel about this project.

amy

18:53

Thank you Dom! Agree. So many people use this trail and need to know what's going on

Maury Wiseman

18:53

Thank you, Dom.

Bill Brattain

18:53

135

As I stated in my verbal comments, I suggest a public meeting at Earlywine Elementary School next to Larchmont Park. It could be combined with a site visit along the levee there to see which trees are expected to be removed, because it's not at all clear in the documents. If it's anything like Sac State, it'll be a disaster. Army Corps hosted a public meeting at that school in 2004 when the levees were raised.

Mara Morrison

18:54

136

Thanks for bringing up the salmon and steelhead habitat. Millions of dollars have just been spent to put in gravel by Ancil Hoffman Park to increase the nesting grounds for both species. WHY spend that money to only turn around and destroy the river by this half-assed project that will damage our beloved river but most of the species that live in and near the river. Time to stage a mass protest against this project!!!

Marion Millin

18:54

137

If the ACE cared about the habitat and wildlife, the projects would not be clearcutting and "mitigation." This is for convenience and control of the water, not for the community or the Web of Life. The scare tactics are not appreciated either. The mention of potential flooding "20 feet in some places" -- right! The Natomas Basin!!!!

Maury Wiseman

18:54

Agree Mara

Jaime

18:54

Mara, I'm down!

joshua thomas

18:54

We also have to read the 2016 GRR and Appendix.

Peter J Connelly

18:54

Good comments Nancy !!!

Eliza J. Morris

18:54

All the additional supplemental documents that are referenced increase that a ton too!

Mara Morrison

18:55

Organize and stop this project.

joshua thomas

18:55

138 | What is the difference between construction access and construction buffer?

JulieG

18:55

139 | agree an extension needs to be provided for public comment and review

Cathy M Birch

18:55

140 | Amen, Nancy!! All those pages require lotsa trees???

Mark Berry

18:55

I feel the same way Nancy!

shawn harrison

18:56

141 | This is a completely unbalanced plan on the American River that sacrifices ecology, beauty and recreation in the name of erosion control/flood control. Must be a more thoughtful approach with a more targeted approach that does not create miles of moonscape. This appears to be a plan that is "easiest" to execute for construction crews under the mandate of flood control, sacrificing decades of stewardship work and hundreds of years of growth of heritage species.

Eliza J. Morris

18:56

142 | Does anyone know if there is a document similar to Lower American River Subreach 2: Summary of Bank Protection Conceptual Design Process?

amara

18:56

143 | I'm really wondering alongside all of these concerns raised . That I fully agree with. Having already destroyed one area with this project why not observe if it is actually effective within the projected "15

years “. After doing so and having physical data, then make a decision for other areas. Without those years of literal time, predictions are simply a calculated guess and for families, children, and general humans in the area, how does it make any logical sense to do something that has been clearly detrimental in another area? What reasoning can you give to that question posed ? And would that be something to consider ?

Andrea Willey, MD

18:56

thank you nancy!

Brenda Gustin

18:57

Great comments, Nancy, about the large amount of information to digest in a very short period of time!

Mikkel Herholdt Jensen

18:57

the health and environmental impact by the heavy construction on the neighborhood is unacceptable. The pre-recorded presentation acknowledges substantial impact, but other than spraying down to limit dust, offers no impact for the disastrous health impact.

Jodie

18:57

Hello neighbors and river lovers! Please check out <https://www.americanrivertrees.org>

Jodie

18:57

And also <https://www.facebook.com/groups/353294447441210/>

amy

18:57

Thank you Jodie!

Matt Carr

18:58

This is Matt Carr. If you can unmute me on my phone number ending in 5283, I'd appreciate it.

M B Schwehr

18:58

145

Some key appendices to the GRR (that are incorporated into this), are not in the copy of the GRR that's in the main USACE website area -- you would need to know to find a version of the GRR copy in the ARCHIVES section to find those appendices.

JulieG

18:58

146

where would we find copies of the consultant reports supplied to USACE that the USACE team is relying on?

Marion Millin

18:58

147

The corps problem with the Corps is ignoring the fact that original riparian habitat is precious, filled with life and IRREPLACEABLE. ANY needed flood protection measures would RESPECT that fact, as well as the existing LEGISLATED protections of the Lower American River.

Brenda Gustin

18:59

Thank you, Jodie. It's very important for people to visit www.americanrivertrees.org and their facebook page. Please share and send to everyone you know who loves our river and the nature who's lives depend upon it!

JulieG

18:59

148

why is vegetation variance not being considered on contract 3B American River sites?

Brenda Gustin

19:00

I agree and would like to hear an explanation of these discrepancies mentioned by Mikkel Herholdt Jensen at 7:00 pm tonight.

Pete Spaulding

19:00

149

This is more than just the disruption to the neighborhood. The American River Parkway is the Jewel of Sacramento. This is the destruction of a wild and scenic river regional park, that has more visitors per year than Yosemite!

Ellen Ganz

19:00

Agree with Mikkel Jensen- devastating for the neighborhood

Jeff H

19:01

150

We are the Capital City of California , we are also the city of TWO RIVERS that people come to enjoy .
Why does ACE want to destroy Our AR Parkway and turn this Beautiful Parkway into the AMERICAN
RIVER CANAL !!

Christine Norman

19:01

Great points!

Eric

19:01

151

They have destroyed it! At least for our lifetimes!

Christine Norman

19:02

He can have my time

M B Schwehr

19:02

I agree with Mikkel Herholdt Jensen's comments - thank you.

Bill Brattain

19:02

Incredible comments Mikkel thank you!!

amy

19:02

Absolutely agree Eric!

joshua thomas

19:02

152

98% of riparian forest has been destroyed in the Sacramento Valley. All of it would have been destroyed
if not for laws such as the Wild and Scenic Rivers Act and the American River Parkway. SARA Park was the
first parcel acquired for the American River Parkway Plan. It is where it all started in the Sacramento
Valley. Contract 3B South would destroy SARA Park.

Andrea Willey, MD

19:02

you need to unmute matt via his ohone

joshua thomas

19:03

"American River Parkway" not "American River PARKway Plan"

Barbara Leary

19:03

153

This is a REGIONAL issue. Sacramento has some of the worst air quality in the nation. Increasing CO2 production and eliminating valuable carbon sequestration is unacceptable. A NO PROJECT alternative must be addressed in our written comments as well.

Lisa Merritt MD

19:03

154

This is not an accessible format for people without wifi access, visual/auditory issues

JulieG

19:03

155

USACE needs to ensure intact wildlife corridors through the river are maintained, preserved, and any disruption per site, mitigation of restored trees and vegetation occur at the site - not another location

mike

19:03

156

The Corps some times acts like an army of occupation. They will do things in the area they occupy that they would not do in their own back yard. They also seem to have no sense of esthetics. They do not seem to see the difference between beauty and ugliness. Of course few things are uglier than the result of a flood in an urban area, but must we accept long term ugliness in the name of safety? We must be able to find a viable alternative that does not turn our regional recreational gem into a moonscape.

Sara Denzler

19:04

157

It's not just the people in these neighborhoods. The American River Parkway provides recreation and nature experiences for people from underserved communities of Sacramento that do not have open space or trees in their neighborhood.

Mikkel Herholdt Jensen

19:04

spot-on, Matt Carr. And look at the Sac State 2001 project on the south side of that river; it is nowhere near equivalent to the Project 3B area

Eric

19:04

You said it Mike! I live near a river, floods and all, because it IS a river! I don't want to live next to a drainage canal!

JulieG

19:05

158

USACE needs to ensure intact wildlife corridors throughout the banks of the river on both sides are maintained, preserved, and any disruption of a site must have onsite mitigation to restore trees and vegetation occur at the site - not another location, or green credits, etc

Chris Conard

19:05

159

Excellent points by Mikkell. It will take decades for the forest to recover, but with reconfiguring, it will likely not have the opportunity to recover. This project will devastate the natural character of the parkway, and eliminate habitat for species that require mature habitat.

Mark Berry

19:05

yes diagrams are not useful

Jeff H

19:05

160

Work around the trees that can be , PLANT Back the number of trees removed (tree on the Largest side) Plant back native plants ..

Mara Morrison

19:06

161

Agree, Mike. I have witnessed the exact damage you are citing. We need to organize and stop this project before the river and parkway are destroyed.

Ben

19:06

162

We all want secure and safe levees but we want it done in a way that protects this incredible nature filled part of Sacramento. We want to see alternatives to the one option given to us that seems totally unacceptable. Im requesting an in person walk along 3B to see exactly how this stretch of river will be changed. A glitching webex presentation does not cut it.

Laura Davidson

19:06

Thank you Matt

Brenda Gustin

19:06

163

Protection of Wild and Scenic Rivers includes "shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads." This plan does not comply in keeping the river largely primitive and undeveloped. <https://www.rivers.gov/about>

amy

19:06

Thanks Matt!!

Melissa Davis

19:07

Thank you Matt!

Laurie Langham

19:07

Thank you so much Matt!

Pete Spaulding

19:07

Matt Carr, please go to www.americanrivertrees.com and let us know how to contact you! Pete

Barbara Leary

19:07

Good points Brenda

Marion Millin

19:08

Matt, that solidarity of the organizations is CRUCIAL.

Jodie

19:08

Good point Sara D

Ben

19:09

Pete I believe its www.americanrivertrees.ORG

Cathy M Birch

19:09

Great comments, Jaime!!

Matt Carr

19:10

There are so many issues. If the Corps will not organize a public meeting, should we organize one? Has anyone not part of the Corps taken notes on all of these impacts? There are some very astute comments as well as some heartfelt concerns. We are apparently under a very short timeframe to coordinate.

amy

19:10

Thank you Jamie!

Nancy Kniskern

19:10

164 | chats are flying by and I would like to read them. Can we get copies?

joshua thomas

19:10

165 | Doesn't the fact that the scoping phase's single alternative action, excavation of channel islands, that was only briefly considered for Contract 3B, suggest that not enough public outreach occurred during the project's scoping phase, especially given the scale of mature riparian forest and recreation space removal in a major urban area?

Marion Millin

19:10

Yes Matt.

Marion Millin

19:11

Maybe revisit that letter and all the orgs and the general public

Brenda Gustin

19:11

That's a great idea, Matt! We can do this too and maybe USACE will attend???

Bill Brattain

19:12

166

There have been excellent comments about the riprap lined shoreline turning the river into an unusable channel recreationally. It will no longer be possible for people or their dogs to wade in or swim in the river without breaking their legs on riprap or being swept downstream due to not being able to get out. The Los Angeles River comes to mind, we need to learn from the mistakes of the past!

Lisa Merritt MD

19:12

167

Why was the prior international gathering documenting the importance of vegetation along the rivers to protect the levees disregarded? Why does the USACE hate trees so much? Based on what science? We just really need a better understanding, is it the inconvenience to being about to quickly move heavy equipment to do the intended construction work, like in the housing industry being cloaked in pseudoscience about scouring? If proper soil samples were done in our area, they would demonstrate this hard packed clay is like a ceramic, reinforced, similarly to how it has been discovered that adding fibers to concrete helps reinforce it, hundreds of years old root structures going deeply in the ground and intertwined with one another are far stronger to withstand climate assaults, are regenerating, and added benefit of air and water quality and temperature management.

168

Christine Norman

19:12

169

Since this is our last public information meeting how will we informed of what decisions you go forward with?

Brenda Gustin

19:12

I agree, Bill.

Andrea Willey, MD

19:13

Thank you Alicia!

amy

19:13

Agree Alicia!!

Melissa Davis

19:13

Thank you Alicia!

Matt Carr

19:14

Here is the text of the 2016 letter that I drafted that was signed as indicated at the bottom by most local and concerned state non-profits and others:

Pete Spaulding

19:14

Thnak you Alicia. Please go to www.americanrivertrees.org and leave us your contact info. Pete

Ben

19:14

170

I have also lived here since 2012, I back right up to the river and I never knew of this project until about 2 weeks ago. So the outreach to neighboring communities and individuals was very poorly done!

Gay Jones

19:14

How to I enter the que for comments?

Andrea Willey, MD

19:14

raise your hand bottom

Ben

19:14

Raise your hand, bottom right

Gay Jones

19:15

Not displayed on my iPad with

Andrea Willey, MD

19:15

requiest in the chat?

Matt Carr

19:15

You may be able to open the 2016 comment letter here. If not I will provide my email address. The lack of a response to the concerns outlined 8 years ago--many the same--is distressing.

Matt Carr

19:15

<https://docs.google.com/document/d/12wDO0hIlo5aYv-VCLJrXu8s2THrTyos7/edit?pli=1>

Jon

19:15

My hand was removed, I had it up for a while. Did I miss my turn?

Alicia Eastvold

19:15

<https://www.facebook.com/groups/353294447441210/>

adele kruger

19:15

folsom dam was modified to allow water release at lower level thus protecting the leveels from dangerous water levels.As I recall releases up to 5000.The levees were reinforced for miles with slurry walls 50 ft deep in the center.The destruction of the riparian habitat far exceeds the needs for flood control on this section of the river.The project should be delayed until appropriate and necessary methods are offered.

Brenda Gustin

19:15

Matt, where is the text of your 2016 letter?

Matt Carr

19:16

Please let me know if the Google Doc link worked.

Brenda Gustin

19:16

Thank you, Matt.

Marion Millin

19:16

172

Yes, we want flood control. The ACE want to create their controlled ditch to run the newly potentially-even-more-catastrophic flows down the Lower American and its raised levees. That justifies their clearcutting and disruption of all the animal and plant and bird and human communities. Wild nature is unpredictable. To us it is precious. To them, it's in the way.

Matt Carr

19:16

Anyone is welcome to email me and I'll provide the document. coyoteontheriver@gmail.com I'm also happy to chat to coordinate. I'm an environmental attorney, though this is not my area of expertise.

Nancy MacKenzie

19:16

173

SARA River Watch website cites a 2006 study that describes the recreational contributions of the American River to the Sacramento region economy. At the time of the 2006 study, each visit to the Parkway generated an average of \$19 for the regional economy, or more than \$364 million annually. I urge everyone on this call to write to the Sacramento Mayor, your councilperson, your legislator to beg them to bring their attention to these Common Features Projects. The Lower American River is the most heavily used river for recreation in California. The American is a state and federally designated Wild and Scenic River. How will these projects affect that designation; how are these projects in compliance with this designation? has consultation been conducted with the state and federal agencies that have jurisdiction over the designation?

Marion Millin

19:17

Brian, don't forget the confusing acronyms!

kathy bradshaw

19:17

174

So glad Jaime brought up the point of mental health. I teach Biology at American River College and send my students to the parkway all the time. They come back refreshed from these urban forests, and many of them don't have access to other beautiful places due to socioeconomic reasons. Please keep this in mind, especially for the people in our community who need this local respite the most.

Ben

19:19

Nancy, speaking of sending emails with your concerns regarding this... it only takes about 2 minutes to send 6 emails with only one click on www.americanrivertrees.org I was very impressed by how easy they made it on there to send emails to the people who need to hear from us...

Matt Carr

19:19

175

Also, something I haven't heard yet is that 3B will likely narrow the river channel and cause the river level to rise. There is a brief reference to the replacement of "open water habitat" on p. 215. See also p. 211. How much river will be turned into land? Where? This is a huge change to morphology and ecology to be mentioned so passingly.

Pete Spaulding

19:20

Brian Whalen, great comments, please go to www.americanrivertrees.com and leave us your contact info.
Pete S

Jodie

19:20

Matt- need permission for your document

Tom K

19:20

Corps of Engineers slurry wall levee protection project passed thru this same area 10 years ago. Closed access to levee from Larchmont park and turned park into equipment yard.

Jeff H

19:20

176

YES , We need In person meetings & more time to read the documents !

Melissa Davis

19:20

Thank you Brian! Yes!!!

Mara Morrison

19:21

Brian, you are so right about the residents who have money won't be impacted.

Jodie

19:21

The FB group may provide more immediate communication among the opposed-
<https://www.facebook.com/groups/353294447441210/>

Brenda Gustin

19:22

Matt, it worked. I requested access so will await your approval.

Brenda Gustin

19:23

This has been my understanding, Adele. Do you know where to access this data?

Matt Carr

19:24

177

This is a good comment about riprap harming fish habitat. Yet the SEIS/SEIR says the project will *improve* fish habitat through vegetation addition. See p. 832. Can the Corps elaborate on this?

Andrea Willey, MD

19:25

Thank you so much for raising this important flaws in the plan Clem!

joshua thomas

19:25

Great comment Clint!

Marion Millin

19:26

178

Loss of the canopy. And that;s where the endangered Dutchman's Pipevine and their butterflies thrive, across from Larchmont Park

Brenda Gustin

19:27

179

Having USACE protect the Central Valley Flood Protection Agency's Designated Floodway upriver is a much greater solution to flood control (nature's way). see: www.preservetheamericanriver.org

Matt Carr

19:27

I have shared the document with everyone who requested it. Thanks. It'd be neat to all share our respective comment letters so we can see each other's comments and not just wait until we get the Corps

Brenda Gustin

19:28

Thank you, Matt. I received it!

joshua thomas

19:28

180

According to the California Levee Vegetation Research Program (2014), USACE's theory that rotten roots promote piping is unconfirmed. Quoting the 2017 Central Valley Flood Protection Plan's Conservation Strategy "no documented levee failures in California's history has been attributed to vegetation (CLVRP, 2014)

Alicia Eastvold

19:29

Matt- how would you suggest we all gather? I am interested in that purpose as well! I worry that this meeting ends and it becomes difficult to continue collaborating.

joshua thomas

19:29

go to americanrivertrees.org

Andrea Willey, MD

19:29

Thank you Matt! I will share my letter.

Eliza J. Morris

19:29

I went ahead and joined that Facebook group (even though I don't really use Facebook).

Pete Spaulding

19:29

To Paul and Keleigh: Are any of the USACE Leadership listening tonight? William Polk, Pam Patton? As you can tell, many of us want access to them. Pete

Eliza J. Morris

19:30

<https://www.facebook.com/groups/353294447441210/>

Nancy MacKenzie

19:30

Ben, thank you. I found that americanrivertrees.com has multiple links to key contacts for comments.

Marion Millin

19:30

181

There's was news that the National Park Service had alternative processes for similar projects. What are the alternatives to the extensive clearcutting/mitigation channeling that this project presents? It's 2025. This is the best we can do?

Tom K

19:30

182

The previous slurry wall project 10 years ago also removed a section of riparian riverbank and habitat near larchmont park and replaced it with rip rap. There used to be lots of steelhead and salmon there. Now a full decade later it is barren of fish and the rocks are covered with blackberry bushes that restrict fishing access

Brenda Gustin

19:31

I agree, Matt, that it is good to share our respective comment letters.

Sarah Norris

19:32

The following is directly from the document (4.1-32): "Over the long-term, the Proposed Action would not substantially reduce the quality or quantity of riparian habitat, despite the temporary habitat loss."

Barbara Leary

19:33

Question for SARA, PAR, American River Trees - will there be an upcoming organizing meeting to coordinate as we had a few weeks ago? Sierra Club is supporting all efforts but clearly we all need to be on the same page re: upcoming coordinated work needed.

Eliza J. Morris

19:33

The original document says that they will need to do a stretch by stretch analysis with specific designs for each stretch.

amara

19:33

183

My other question is how exactly are we supposed to effectively be heard as a community when it is very clear that our questions and concerns are being limited, and unanswered ? During an extremely limited time period. What is the take on this question ? As an artist I studies at RISD. I like to think I have an impeccable sense for aesthetic design. I often draw, observe and gain inspiration from the River . The projected "vision" from a artistic perspective is extremely unattractive. If we were in a critique it could be said the visual vision for the project is blatantly ugly. Is there a environmental designer even working on this ? Or someone who is giving any input to the physical design of this project? Truly if I were to have

submitted this as a design for a potential project when I was in school I would have gotten a D or lower. Purely because it is ugly. The functionality of the design does not supplement or counteract the pure hideousness of dirt and sand being plotted about in a

amara

19:33

seemingly disjointed and visually unappealing manner. Is there even an environment designer ? Is there an environmental graphic designer? Is there a sustainability designer who approved this project or contributed to it, most eco designers would be appalled at a project of this magnitude. Designers typically aim to create spaces that are both functional and aesthetically pleasing. That promote a sustainable relationship between people and the environment. Designers and environmental architects are supposed to cultivate and create environments that are stimulating, focus on preserving green spaces, retaining most of the topography and balance that with the climate. That is the core of the job and the vital life principle of those professions. That is why I am inquiring. I would be very confused and concerned if any professional environmental architect, environmental designer or an environmental graphic, that would create or produce such a poorly executed design. I can not reiterate how

amara

19:33

confused I am that dirt with no trees or animals, would create a space that would enhance the natural social, culture, and physical environment of this particular area.

Eliza J. Morris

19:34

I cannot find any stretch by stretch analysis for our section though.

Ben

19:34

Agree Kate Roselieb!

JulieG

19:34

184

long term impacts from tree loss in the areas of contract 3b will be significant to residents there. The area is already bracketed by extremely high traffic roadways (Watt Ave, Hwy 50, Folsom Blvd). - the canopy loss is part of protections from pollutants harmful to residents in that region, especially children and sensitive groups, as well as general public.

Ellen Ganz

19:34

185 | The report said that the impact on air quality is significant and unavoidable- What does this mean? Is it
safe to live here? What toxins will be in the air? Will there be any way to monitor it? These should be
186 | simple question for anyone knowledgeable about the project to answer. I am requesting a public meeting
with a representative that can answer questions.

amy

19:34

Absolutely agree Kate!

Ellen Ganz

19:35

I am specifically referencing the "3B" project

Brenda Gustin

19:35

I'm happy to receive your respective letters and will forward them to American River Trees if you send them to preservetheamericanriver@gmail.com

Barbara Leary

19:36

Thanks Brenda.

Brenda Gustin

19:36

I'm working with American River Trees to spread the word.

Matt Carr

19:36

187 | Tom K - please comment formally on your experience with the riprap near Larchmont. It's awful from a
recreational, aesthetic, ecological, and fishery standpoint, yet is what the entire stretch will look like.

Matt Carr

19:37

Thank you for coordinating, Brenda.

Andrea Willey, MD

19:37

For those interested in the waterbird habitat study on mile 11 the FaceBook page
<https://www.facebook.com/profile.php?id=61553991934846>

Andrea Willey, MD

19:38

Thank you Julie!

Cathy M Birch

19:38

Right on Julie G!! Cheers, Cath

erik gabele

19:40

I understand that this project is being sold with urgency. I also understand that construction scheduling is based on funding availability by fiscal year.

Jeanne

19:40

188 | We need maps of those trees NOW, not close to when the project starts!

Andrea Willey, MD

19:40

Erik this is an important point.

Eliza J. Morris

19:42

189 | There was some erosion at the site they redid and left bare just upstream of Guy West Bridge (as of today!).

Brenda Gustin

19:42

Thank you Andrea.

Susan Mills

19:42

190 | Thank you to all the commenters. I agree and ask the US Corp Army Engineers to reevaluate these projects and make substantive changes to the plan in response to these well thought and articulated comments and analysis brought forward.

Nae

19:42

Naomi Ennis. I couldn't find a way to change my name before now.

Keleigh Duey

19:43

Thanks Nae!

erik gabele

19:44

191 | I think the public would be a lot more receptive if several years were allowed to pass between phases to allow for revegetation of prior phases before disturbing new phases.

Marion Millin

19:44

192 | Let's remind ourselves that this original riparian habitat is rare, irreplaceable and PRECIOUS. Why isn't it protected? IT IS. Wild and Scenic River status and the recently legislated Lower American Conservancy.

Nae

19:44

You're welcome :)

Helen Gallagher

19:44

193 | I agree with everyone who spoke up. I see no need for this project as it. This project needs to be more carefully thought out.

Marion Millin

19:45

It's 2025! Who channelizes a river?

JulieG

19:46

Agree Marion

Cathy M Birch

19:46

Mark, you are SO WISE!! Thanx for clarifying the "Wild and Scenic River" unique aspects! Cheers, Cath

Marion Millin

19:46

Bravo Mark. Thank you.

Andrea Willey, MD

19:46

Well said Mark. Thank you.

JulieG

19:47

Excellent comments Mark Berry!

Jaime

19:47

My full name is Jaime Becker

Marion Millin

19:47

Very interested in your point Julie G. Thank you.

Brenda Gustin

19:48

Thank you, Mark Berry. Well said!

Alicia Eastvold

19:48

Marion, how does the legislated Lower American Conservancy chime in on this project? Or have they? Where are the representatives from other vested agencies and organizations? Neighbors must not be the only ones interested in this! I just don't understand where those voices are...

Keleigh Duey

19:48

Thanks Jaime.

Brian Whalen, P.G.

19:48

lol, no Jon we definitely don't trust the process

JulieG

19:48

JulieG - full name Julie Gabele

Ben

19:49

Full name - Benson Cobbold

mary

19:49

Mary Wing

Eliza J. Morris

19:50

194 | I have been unable to find specific data for the 3b stretch. Without that it is very hard to trust the process.

JulieG

19:50

195 | Why is your USACE program manager, project manager, and engineers not on this call? How can we have an effective meeting with USACE without your team being on call that are leading this?

Keleigh Duey

19:50

Thanks for putting your full name. Best to email us at ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov.

Marion Millin

19:51

MAGPIES!

JulieG

19:51

196 | If the USACE of engineers does not meet the calendar milestones - do you lose funding?

Andrea Willey, MD

19:51

Thank you Jon!

Andrea Willey, MD

19:52

I suspect this is all about the funding.

Jon

19:52

Jon Schwedler

Brenda Gustin

19:52

" Why is your USACE program manager, project manager, and engineers not on this call? How can we have an effective meeting with USACE without your team being on call that are leading this?"

Susan Solarz

19:52

197

I live within 1/2 mile north of the American River. I walk regularly from my home to behind Rio Americano HS to Watt. I agree with the comments, particularly about short and long term impacts to the sensitive habitat of this wild and scenic river. I too have seen bald eagles, sea lions, river otters, migrating salmon, native western pond turtle, coyotes and more.

JulieG

19:52

198

sorry, let me rewrite that - if USACE does not meet the project milestones for contract 3b does the Corp lose funding

Brian Whalen, P.G.

19:53

AMARA the planning and communication to the public would be a huge fail

Nancy MacKenzie

19:55

Wild and Scenic Rivers Act was designated by Congress and identifies four primary agencies charged with protecting and managing Wild and Scenic Rivers: BLM, USFWS, US Forest Service, and NPS. California BLM has state jurisdiction. I will send contact information to American River Trees. I think we need to alert these agencies.

Cathy M Birch

19:55

Right on Amara! the proposals are Ugly. And total destructive of the American River Parkway areas. Unnecessary and not solutions. Thanx for sharing!

Andrea Willey, MD

19:55

Thank you Amara!

Laurie Langham

19:56

Amara I appreciate your perspective, well said!

Ellen Ganz

19:56

199

If there is not enough time, and no answers, why not another meeting? Can there be someone who can answer our questions? I am asking for another meeting, and an in-person meeting

Marion Millin

19:57

200

Why? Because the potential for catastrophic has been increased by the higher levees and dam -- whose operating the system behind that volume of water? Those who prefers a channel over a protected and irreplaceable natural resource.

JulieG

19:57

Great points Amara! There are other USACE projects that have been done in commercial areas - like Guadalupe River by San Jose that have better aesthetics alone

Cathy M Birch

19:57

Yay Gay!! Cheers, Cath

E Sunahara

19:57

201

Has this been reviewed with the county board of supervisors and what was their feedback?

Andrea Willey, MD

19:57

Great point about the islands slowing flows Gay!

Eliza J. Morris

19:58

202

I would like to see a segment by segment analysis and why certain design choices are being made for each segment and have time to comment on that analysis.

Ben

19:58

Yes Ive been thinking how ironic that background has been...

Alicia Eastvold

19:59

203

USACE: can I suggest that if you are unable to do a public hearing, that you might be able to meet with some select individual representatives who could walk the area with you and communciate back to the greater community the detail for this project?

JulieG

19:59

Agree great webex background with lush natural trees for webex meeting Kaleigh.

Dom

19:59

Unsure if you'll be using the participant list to continue to contact us about future meetings. I hope you are. If not my email is dominicfgutierrez@gmail.com

Jon

19:59

Great point Elton. Maybe we should all change our backgrounds to the moonscape we see at River Park.

Eliza J. Morris

20:00

I would also like information about any future meetings: eliza.morris@csus.edu. Thank you!

Mikkel Herholdt Jensen

20:00

I would also like to share my email in case there are additional meetings: mikkel.jensen@csus.edu.

Brenda Gustin

20:01

Excellent and valid comments, Elton.

Andrea Willey, MD

20:01

Thank you Elton!

amy

20:01

Thank you Elton!!

JulieG

20:01

Excellent points Elton!

Gay Jones

20:01

My downloads of the Corps' report display almost 2,500 pages.

Nae

20:01

204 | 1. Please change the approach from bulldozing and uprooting miles of trees to a more surgical approach.

205 | 2. Must present alternatives to these large canopy trees being removed.

206 | 3. There are some stretches where large trees were left (Campus Commons golf course and area near Howe Ave. bridge) and not bulldozed. Please leave the large trees and do the project work around these large trees

207 | 4. What about reinforcing the actual levee that does not have any trees on it? Has that been considered? If yes, please share information with public. If no, why has that option not been considered?

208 | 5. Within the next 1-2 weeks, please provide a detailed map of all the trees that are scheduled for removal for the upcoming 3B project, North & south sides of the project.

mary

20:02

Thank you Elton! Will you represent me when they arrest me for being chained to a tree? Going back to the 70s I guess

Nae

20:02

209 | 6. I'm particularly concerned about the large, mature trees & vegetation between Howe Avenue & Watt Avenue & on the north side of the river. Currently there's a canopy of shade there and we need to know what trees are planned to be removed.

I regularly see deer, rabbits, partridge, cormorants, turtles, quail, & turkeys. I also regularly see Coyote. I even saw a Bobcat between howe and watt in October 2023. There are at least 4 major access points between the Guy West footbridge & Watt Ave. this is one of the most highly trafficked & accessed areas of the Parkway.

210 | 7. I agree with the mental health concerns for residents & visitors to the Parkway. During the project work in my backyard near Sacramento State University, there were days when my mental health was severely affected by the daily destruction, unending noise, and building-shaking vibrations that happened during the course.

211 | 8. If the peak flood control flows are not going to be increased, why is this project happ

Nae

20:02

212 | 9. Why does the project work West of the J street bridge (River Park and Campus Commons golf course) not have any regrowth after 2 years?

213 | At the very least, there should have been grass growing in that project area but there has been nothing, and it's been more than 2 years since that was supposedly replanted.

214 | 10. Have trees been replanted in the project work area in the Sacramento State Universiy area and downriver? If yes, what trees were planted?

215 | 11. I see something that looks close to the water edge. What if those baby trees are washed away in a high-water event, what is the plan to replant trees that are washed away (that havne't taken root yet).

C Duke

20:03

216 | 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. 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. 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. How will these social/primitive fishing trails be mapped, to ensure that they are still available for recreators after the installation of rip rap?

Nae

20:03

217 | 12. I concur with the disappointing public outreach efforts. Did the 3B project area residents receive notice of the project? If yes, when?

218

I live near the Sacramento state project and was not notified about the project until the trees were already cut down. A group of us contacted the corps many times about this, so I'm very frustrated and disappointed that since February of last year, the Corp hasn't improved their outreach efforts.

Gay Jones

20:03

219

The American River Parkway is a Regional Park.

Outreach needs to touch all residents of our region.

Nae

20:04

220

13. I see erosion already happening near the Howe Ave. bridge (about 100 yards downriver) in the area where trees were removed. This area did not have the observed erosion prior to the removal of trees and vegetation.

221

14. Please provide multiple field days with Army Corp staff to explain project work and answer questions about residents questions, especially about any trees that are scheduled to be removed.

222

15. Even with the water spraying, there was still a lot of dust on vehicles in the project area near Sacramento State.

NAH

20:05

223

please explain the specific needs requiring these specific measure in 3B.

Matt Carr

20:05

224

Agree with C Duke at 8:04, yet the SEIS does not even mention the riprap or impacts to recreation beyond the bikeway. The bikeway is great, but hiking and water-based recreation need to be assessed too. One type of recreation should not dominate the analysis like this, and the lack of analysis of these other types of recreation is a glaring and appalling omission.

Mark Berry

20:06

the only

Brian Whalen, P.G.

20:06

225

If USACE leadership isn't online listening to this call right here tonight, it's an insult to the families who live in the area of the proposed work, affected by the work.

JulieG

20:06

226

why is Central Valley Flood Protection Board, CA Department of Water Resources not joining you on this meeting? CVFPB is lead agency from state perspective. What outreach are they doing? The EIS/EIR combines federal and state parties - so all parties should be involved in public meetings.

Andrea Willey, MD

20:08

Agree Lisa!

Alicia Eastvold

20:08

Sharing again... We need to keep collaborating after this meeting:

<https://www.facebook.com/groups/353294447441210/>

Nancy MacKenzie

20:08

227

Keleigh, Will this recorded meeting including comments and Chat be available after the meeting (a link on the Corps' project website?). Thank you.

Nae

20:08

228

Large posters were finally put up near Sacramento State University. But these posters were put up LONG AFTER all the trees were removed and the project work started. In February of 2023, residents here asked that the Army Corp do better with publicizing this massive project. The poster states that the project is funded in the billions, there MUST absolutely certainly be money available for better communication and opportunity involvement.

Gay Jones

20:08

Excellent analogy!

Thank you.

Mara Morrison

20:09

Lisa, good call! The only way to stop this horror from taking place is filing a lawsuit or several suits to stop it.

Nae

20:09

How about a meeting at Sacramento State University? They have large rooms there and even outdoor stadiums.

amara

20:09

Very well said Lisa

Andrea Willey, MD

20:09

I agree with the urgency having everything out with funding. I also think legal action should be taken.

JulieG

20:11

229

CVFPB & Ca Department of Water Resources have hearing room that can support large audiences in their building, as do so many other state departments in CA - so space at free or low cost not issue for in person meeting. Why is the USACE not holding in person meetings?

Jajuan Francis

20:11

230

Thank you everyone for your involvement and expertise. Keep spreading the information. Stop this nonsense.

Gay Jones

20:11

You have my vote, Doc!

Alicia Eastvold

20:11

Stay involved. Let's keep this conversation going! <https://www.americanrivertrees.org/>

amy

20:11

Thank you Lisa!!

William Avery

20:12

Thank you Lisa!

Eliza J. Morris

20:12

231 | Our neighborhood also does not require flood insurance ... which should really show that for those who do the calculations it shouldn't be required.

Ben

20:12

232 | Thank you Dr Merritt! I rushed home from UCDMC to make the meeting myself. Having worked the COVID ICU during the peak of the pandemic this stretch of river provided me the fresh air and nature escape I needed for sanity after a long day in the ICU...

Laura Davidson

20:12

233 | Fifteen years is practically an entire childhood. The area between Howe and Estates is so gorgeous and valuable as a resource for recreation and psychological health, and it breaks my heart that this area could be devastated the way that the River Park/Sacramento State University section has been. This area has been so important to me and my child. We walk this area several times a week because of the various walking trails available as well as the peace, quiet, and beauty. The proposal appears to reduce the walking trail to one singular large/wide trail. One large pathway is not a adequate replacement for all of the walkers, bikers, runners, etc. that would use the path.

Carey Knecht

20:13

234 | Where is the testimony in support of this project? Not a single comment that I heard.

Brian Whalen, P.G.

20:13

Thank you Dr Merritt

Marion Millin

20:13

235 | The mental and physical health of the region would be impacted by the devastation of the American River and the web of life it supports, at the same time that Capitol Park will be under construction and unavailable for all the many ways that the public enjoys its outdoor space (and the wildlife it supports).

Matt Carr

20:13

I deeply appreciate the powerful comments from the community, and leave this meeting with many more questions about the project. I've learned, though, that my community is even more amazing than

I'd expected. Thank you all. Let's get the Corps to really take a hard look at this and change their approach.

Lisa Merritt MD

20:13

I soooo feel you Ben. We housed many travel nurses and therapists who took full advantage of our healing environment to shoulder the gear and keep going. I still have Covid patients right now. Nothing like taking that mask off and a long walk on the river to clear your head and heart.

J. Paul Bruton

20:13

www.sacleveeupgrades.com

Bailey Hunter

20:14

Thank you all for attending. Please provide written comments to ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

Lisa Merritt MD

20:14

americanrivertrees.org

Lisa Merritt MD

20:14

sign up to be part of the community voice

Bailey Hunter

20:14

Here is a link to the SEIS:

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/SEIS-SEIR/ARCF_Draft-SEIS-SEIR_Dec2023.pdf?ver=AO3ouyT-D15CF8wpXMACuQ%3d%3d

J. Paul Bruton

20:14

ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

Bailey Hunter

20:14

You can keep up with information related to this SEIS/SEIR by accessing sacleveeupgrades.com

Alicia Eastvold

20:15

aliciaeastvold@gmail.com

Nae

20:15

<https://www.americanrivertrees.org/>

Gay Jones

20:15

236 | When and how will our questions be answered?

Andrea Willey, MD

20:15

andrea.willey@mac.com

Gay Jones

20:15

Who is the decider here?

Laurie Langham

20:15

lkl

Laurie Langham

20:16

laurielangham@sbcglobal.net

Carey Knecht

20:16

Thank you for the work to request the comment period extension from management

JulieG

20:16

237 | Your public outreach needs to be extended further and include leader, program managers, engineers, and team involved - and in person...please stop being afraid of the public. We are great resources that can help.

Bailey Hunter

20:16

We will be responding to your comments in the Final ARCF SEIS/SEIR. We anticipate this document to be released to the public during Late Spring/Summer of 2024 and will be posted to <http://www.sacleveeupgrades.com>.

Bill Brattain

20:16

bbrattain@hotmail.com

Jaime

20:16

238 | Yes requesting an extension for public comment and another public meeting.

mary

20:16

239 | I would like to be notified of the extension. mk.starkey@yahoo.com

Brenda Gustin

20:17

bkgustin@gmail.com

Jeanne

20:17

jeannePletcher@comcast.net

Lisa Merritt MD

20:17

Thank you so much, and everyone for MORAL COURAGE! The trees and all green things and critters and children and neighbors are counting on us

Pete Spaulding

20:17

Good job Keleigh!!! I owe you a bottle of wine! It will be less than \$25 so you don't have to report it.

Jaime

20:17

jaime@jaimesells.com

Andrea Willey, MD

20:17

Thank you.

Barbara Leary

20:17

sacramentosierraclub@gmail.com

Brenda Gustin

20:17

Thank you all!

Lisa Merritt MD

20:17

admin@the-MHI.org

NAH

20:17

Great Job Keleigh...

Matt Carr

20:17

But we will get the answers too late to change the project, most likely. We hope you modify the project.

Ben

20:17

Wow you are a biologist Keleigh, this must be heartbreaking to you too then. Thanks for hosting!

Marion Millin

20:17

Thank you

Jenn

20:17

Thank you

Nae

20:17

stopparkwaydevastation@gmail.com

Jodie

20:17

Thank you Keleigh!

C Duke

20:17

Thank you for taking the time to hear our concerns, Keleigh

Mikkel Herholdt Jensen

20:17

Thank you.

JulieG

20:17

Thank you

amara

20:18

I would add an engineer is not an environmental designer and could not be expected to create an aesthetically appealing design that is a silly expectation

rosie

20:18

Thanks for your time and attention.

Gay Jones

20:18

Again, who makes these decisions, I.e. comment period extension, doing additional data, changing the scope of work

Nae

20:18

<https://www.americanrivertrees.org/>

Nae

20:18

<https://www.sarariverwatch.org/>

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

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

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

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

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

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

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

3
cont'd

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.

4

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.

5

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.

6

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)).

7

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

9
Cont'd

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

10

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

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

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

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

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

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

14

15

15
Cont'd

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

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

16

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

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

17

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

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

18

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

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

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

19

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

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

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

Thank you.

[NAME]

AR Parkway Form Letter 2 (Form Letter 4)

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

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

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

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

The American River Parkway is extremely valuable to me.

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

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

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

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

Thank you.

[YOUR NAME AND INFO]

Form Letter 5 (AR Parkway Form Letter 3)

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

To: Jonah.Knapp@CVFlood.ca.gov

Cc: Chris.Lief@CVFlood.ca.gov

Bcc: AmRivTrees@gmail.com

Dear President Dolan and Members of the Board and Staff:

1

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

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

2

And, I respectfully request that your Board:

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

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

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

3

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

4

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

5

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

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

6

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

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

7

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

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

Thank you.

List of Key Concerns

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

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

2. Rip Rapped streambanks present significant negative consequences:

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

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

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

4. Impact on Wildlife and Critical Habitats:

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

5. Recreational Access:

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

6. Mental Health and Vegetation

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

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

7. Cultural Restoration and Inclusion:

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

8. Air Quality:

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

9. Environmental Justice (EJ):

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

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

Dear Jane Dolan and Chris Lief:

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

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

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

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

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

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

Thank you.

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

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:31 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: American River Common Features (ARCF) 2016 Draft SEIS-SEIR - Public Comment
Attachments: ARPF Comments on ARCF Comprehensive SEIS-SEIR.docx.pdf

From: Daniel Whitaker <dwhitaker@arpf.org>
Sent: Thursday, February 22, 2024 2:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Common Features (ARCF) 2016 Draft SEIS-SEIR - Public Comment

To whom it may concern,

I am emailing on behalf of the American River Parkway Foundation to formally submit a comment letter on the American River Common Features (ARCF) 2016 Draft SEIS-SEIR.

Please see attached for the letter in .pdf format.

Our comments are focused on the contracts that will take place within the American River Parkway. Thank you for considering our concerns regarding this matter.

Best regards,
Danny



Daniel Whitaker he/him/his/él

Natural Resources Manager

American River Parkway Foundation

5700 Arden Way | Carmichael, CA 95608

p. (916) 486-2773 | c. (520) 604-3093 w. www.arpf.org



5700 Arden Way
Carmichael, CA
95608

www.arpf.org

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Nicole Tanimoto
Special Events Manager

Daniel Whitaker
Natural Resources Manager

American River Parkway Foundation
5700 Arden Way
Carmichael, CA 95608
20 February 2024

U.S. Army Corps of Engineers
Sacramento District

Dear Sir/Madam,

The American River Parkway Foundation (ARPF) is writing to express our concerns regarding the proposed erosion control projects outlined in the ARCF Comprehensive SEIS/SEIR. While we understand the necessity of these projects for mitigating erosion, it is imperative that we carefully consider their environmental consequences and take steps to minimize their impact on the ecosystem.

As outlined in the California Environmental Quality Act (CEQA) guidelines, projects with the potential for significant environmental impact require the preparation of an Environmental Impact Report (EIR) to identify feasible mitigation measures and reasonable alternatives. It is essential that the U.S. Army Corps of Engineers (USACE) adheres to these guidelines and thoroughly evaluates the environmental effects of the proposed projects.

Several aspects of the proposed projects raise concerns regarding their potential environmental consequences. For example, the sourcing of soil from off-site commercial sources within 100 miles of the project site raises questions about the risk of introducing invasive plant species. It is crucial that measures are put in place to ensure that the soil used is free from invasive seeds to prevent further disruption to the local ecosystem.

Furthermore, the removal of trees from the construction footprint and disruption of existing habitats, such as wetlands, raises concerns about the long-term impact on local wildlife and biodiversity. While we appreciate efforts to protect existing trees and mitigate habitat disturbance, it is essential to have a transparent process for determining which trees will be preserved and how habitat disruption will be minimized.

Additionally, the proposed staging areas within the American River Parkway and disruption of recreational trails, such as the multi-use equestrian trail, highlight the need for comprehensive mitigation plans. It is essential that USACE explores alternatives to minimize recreational impacts and ensures that staging areas are restored to their initial conditions after project completion.

1

2

3



5700 Arden Way
Carmichael, CA
95608

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Daniel Whitaker
Natural Resources Manager

Moreover, the construction of berms and rerouting of bike trails in sensitive riparian areas requires careful consideration of habitat connectivity and recreational values. Alternative actions, such as Alternative 3a, which minimize environmental and recreational impacts, should be thoroughly explored, and considered as viable alternatives to the proposed action.

4

Furthermore, we encourage USACE to engage in meaningful consultation with Indigenous communities and stakeholders to ensure that their voices are heard, and their concerns are addressed in the decision-making process.

5

In conclusion, while erosion control projects are necessary, it is crucial that USACE prioritizes environmental conservation and minimizes the impact on local ecosystems and recreational activities. We urge USACE to expand upon mitigation plans and explore alternatives that reduce the environmental and recreational impacts of the proposed projects.

6

Thank you for considering our concerns regarding this matter. We look forward to seeing further efforts to address these issues and ensure the preservation of our natural environment.

Sincerely,

American River Parkway Foundation
(916) 486-2773
info@arpf.org



January 17, 2024

Via Email

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

**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:

We are working on public comments regarding the above Draft SEIS/SEIR. However, we are unable to find a number of documents that are essential to our evaluation of the Project. These documents are not available at the USACE Digital Library, nor could we find them through a Google or Worldcat search. We therefore respectfully request that the documents be made publicly available and a new 45-day comment period established.

The documents are as follows:

1. Ayres Associates. December 1997. American and Sacramento River, California Project-Geomorphic, Sediment Engineering, and Channel Stability Analyses. *See, e.g.*, American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, p. 12.
2. Ayres Associates, "Erosion Susceptibility Analysis for Infrequent Flood Events", July 2004. *See, e.g.*, (1) American River Watershed, Common Features, General Reevaluation Report, Attachment B, Hydraulic Report, p. 47; (2) American River Watershed, Common Features, General Reevaluation Report, Attachment C, Geotechnical Report, p. 40; (3) American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, pp. 13, 41.

3. Ayres Associates, “Channel Stability Analysis of the Lower American River, Folsom Dam to the Confluence, Sacramento, California”, January 2010. *See, e.g.*, (1) American River Watershed, Common Features, General Reevaluation Report, Engineering Appendix, p. 39; (2) American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, pp. 3, 13 and 68.
4. West Consultants, “Lower American River, Panel of Experts, Findings Report,” Prepared for U.S. Army Corps of Engineers, December 2010. *See, e.g.*, (1) American River Watershed, Common Features, General Reevaluation Report, Attachment B, Hydraulic Report, p. 24; (2) American River Watershed, Common Features, General Reevaluation Report, Attachment C, Geotechnical Report, p. 47; (3) American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, pp. 3, 14, 19, 22.
5. Fugro Consultants, Inc., “Lower American River, Stratigraphic and Geomorphic Mapping Report, American River Common Features, Sacramento County, California”, Prepared for U.S. Army Corps of Engineers, June 2013. *See, e.g.*, (1) American River Watershed, Common Features, General Reevaluation Report, Attachment C, Geotechnical Report, p. 25; (2) American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, p. 19.
6. Fugro Consultants, Inc., “Lower American River, Upstream Sediment Source, Reconnaissance Report, American River Common Features, Sacramento County, California”, Prepared for U.S. Army Corps of Engineers, September 2012. *See, e.g.*, American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, p. 20.
7. Geotechnical Office Report, Geotechnical Expert Elicitation Meeting Minutes, July 2009. *See, e.g.*, American River Watershed, Common Features, General Reevaluation Report, Attachment E, Erosion Protection Report, p. 59.

Both NEPA and CEQA require that documents such as these be made available for inspection during public comment. For example, NEPA states: “No material may be incorporated by reference unless it is reasonably available for inspection by potentially interested persons within the time allowed for comment.” 40 C.F.R. § 1501.12; *see also League of Wilderness Defs./Blue Mts. Biodiversity Project v. Connaughton*, No. 3:12-cv-02271-HZ, 2014 U.S. Dist. LEXIS 170072, at *41-52 (D. Or. Dec. 9, 2014) (“Section 1502.21 plainly prohibits an agency from relying on information in the preparation of an EIS while refusing to make that information available to the public.”). CEQA similarly requires that “[i]nformation relevant to the significant effects of a project, alternatives, and mitigation measures which substantially reduce the effects shall be made available as soon as possible by lead agencies, other public agencies, and interested persons and organizations.” Pub. Res. Code § 21003.1(b).

Sincerely,



Justin Augustine
Center for Biological Diversity
916-597-6189
jaugustine@biologicaldiversity.org

cc:

Liz Bellas, Director, Sacramento County Regional Parks, BellasE@saccounty.net
Pete Ghelfi, Director of Planning, Sacramento Area Flood Control Agency,
ghelfip@saccounty.gov
Gregg Ellis, ICF, Facilitator, BPWG/TRAC, gregg.ellis@icf.com
Patrick Kennedy, Chair of the Board, Sacramento Area Flood Control Agency,
SupervisorKennedy@saccounty.gov
Susan Rosebrough, National Parks Service, Susan_Rosebrough@nps.gov
Wade Crowfoot, Director, California State Natural Resources Agency (via Tony Andersen,
Deputy Secretary, Tony.Andersen@resources.ca.gov)
Stephen Green, President, Save The American River Association (SARA),
info@sarariverwatch.org
Yana Garcia, Secretary for Environmental Protection, CalEPA, cepacomm@calepa.ca.gov
Abdulfetah Sigal, Environmental Protection Specialist, Tribal, Intergovernmental and Policy
Division, sigal.abdulfetah@epa.gov
Robin Truitt, Environmental Protection Agency, Truitt.Robin@epa.gov
Army Corps of Engineers Comment Portal, ARCF_SEIS@usace.army.mil
Department of Water Resources Comment Portal, PublicCommentARCF16@water.ca.gov

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Tuesday, January 23, 2024 10:12 AM
To: Sutton, Drew
Subject: [EXT] FW: Documents re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

From: Justin Augustine <jaugustine@biologicaldiversity.org>
Sent: Monday, January 22, 2024 10:34 AM
To: Guy.K.Romine@usace.army.mil; Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Subject: RE: Documents re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

You don't often get email from jaugustine@biologicaldiversity.org. [Learn why this is important](#)

Good morning,

After examining the documents we received this past Friday, we discovered that they reference three additional documents we do not have access to. We therefore respectfully ask that the following 3 documents be provided:

1. David Ford Consulting Engineers (Ford Engineers) (2018). "Lower American River Erosion Risk Assessment." Feb. 1.
2. HDR (2019). "Lower American River erosion conditional risk assessment: Subreach 1, 3, and 4".
3. Sacramento Area Flood Control Agency (SAFCA) (2017). "Erosion Risk Characterization Methodology for the Lower American River Study Area." Memorandum to Dan Tibbitts, SAFCA, from Michael Kynett, MBK Engineers; Ray Costa, Consultant; and David Ford, David Ford Consulting Engineers. October 18.

Thank you,

Justin Augustine

From: Justin Augustine
Sent: Friday, January 19, 2024 12:45 PM
To: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Cc: Romine, Guy K SPK <Guy.K.Romine@usace.army.mil>
Subject: RE: Documents and comment period re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

I just received the 8 documents I had asked about. Thank you, I appreciate it.

--Justin Augustine

From: Justin Augustine
Sent: Thursday, January 18, 2024 2:42 PM

To: Brown, Josh@DWR <Josh.Brown@water.ca.gov>

Cc: Romine, Guy K SPK <Guy.K.Romine@usace.army.mil>

Subject: RE: Documents and comment period re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Thank you for the response. As we were doing additional comment work today, another document came up that we are also unable to find. It is listed as "HDR and Ford Engineers. 2019. Lower American River - Subreach 1, 3, and 4 tier classification Technical memo – Nov. 13, 2019." We would appreciate if that document could also be provided to us.

Thanks,

Justin Augustine

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>

Sent: Wednesday, January 17, 2024 8:44 AM

To: Justin Augustine <jaugustine@biologicaldiversity.org>

Cc: Romine, Guy K SPK <Guy.K.Romine@usace.army.mil>

Subject: RE: Documents and comment period re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Good morning, Justin.

Your documents and comment period request letter was received. Let us work through the proper procedures to fulfill this request.

Thank you,
Josh

Josh Brown

Sr. Environmental Scientist (Supervisor)

Department of Water Resources

Division of Flood Management

Flood Projects Branch

Cell: (916) 539-2030

From: Justin Augustine <jaugustine@biologicaldiversity.org>

Sent: Wednesday, January 17, 2024 8:06 AM

To: Guy.K.Romine@usace.army.mil; Brown, Josh@DWR <Josh.Brown@water.ca.gov>

Cc: BellasE@saccounty.net; ghelfip@saccounty.gov; gregg.ellis@icf.com; SupervisorKennedy@saccounty.gov; Susan_Rosebrough@nps.gov; Andersen, Tony@CNRA <Tony.Andersen@resources.ca.gov>; info@sarariverwatch.org; Communications@EPA <CEPAComm@CALEPA.ca.gov>; sigal.abdulfetah@epa.gov; Truitt.Robin@epa.gov; ARCF_SEIS@usace.army.mil; DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>

Subject: Documents and comment period re December 2023, Draft SEIS and SEIR XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA

Some people who received this message don't often get email from jaugustine@biologicaldiversity.org. [Learn why this is important](#)

Good morning,

Please see the attached letter asking for documents, and an extension of the comment period, regarding the December 2023, Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV; American River Common Features, 2016 Flood Risk Management Project, Sacramento, CA.

Thank you,

Justin Augustine
Center for Biological Diversity
916-597-6189



February 23, 2024

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

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

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**

We respectfully request that you not move forward with the plans described in Contracts 3B and 4B ("Project" or "Proposed Action"). 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. Thousands of people use this particular forested area every year for fishing, wildlife-watching, hiking, swimming, canoeing, kayaking, paddle boarding, tubing, relaxing, and to escape the urban environment and summer heat.

1 The recreational and fishery values of the Project area are why it is protected under both the federal and state Wild and Scenic River Acts. As stated in the California Wild and Scenic River Act, protected rivers like the Lower American "shall be preserved in their free-flowing state, together with their immediate environments, for the benefit and enjoyment of the people of the state." We hope you will listen to the numerous concerns raised by the public, and work together with us to achieve a solution that meaningfully protects the River's riparian forest and its associated values.

Our comments below describe the harmful outcomes of the proposed Project. Overall, the Project fails to comply with the federal Wild and Scenic River Act, the California Wild and Scenic River Act, the California Environmental Quality Act, the National Environmental Policy Act, and other laws and policies as discussed below. In addition to the destruction of the River's shoreline and riparian forest, and the loss of many recreational activities and wildlife resources associated with them, the Project will also have detrimental impacts beyond the riparian area. For instance, the Project's construction, and construction routes, are located adjacent to a Title 1 elementary school, and will result in harmful noise and air quality impacts to sensitive populations.

A. The Forest of the Project Area

2 As shown in the below pictures (and those submitted by others), numerous trees, including heritage oaks, exist in the 3B and 4B areas. These large trees have evolved with flooding events over the past hundreds of years. They deserve protection from an ecological standpoint, a safety

#2
cont'd

perspective, and because of their value under the Wild and Scenic River Acts. The forest in the Project area serves as an important wildlife corridor between the forest segments near River Bend Park and Howe Avenue. These pictures, and an attached map,¹ depict beaches, swimming areas, hiking trails, and wildlife of the area.



¹ See Exhibit A

#2
cont'd



A video of the Project area can be viewed at <https://www.youtube.com/watch?v=4bKBNZHrrYI>.

#2
cont'd

In addition, the following pictures from previous projects to the west illustrate the destruction that would occur in the 3B and 4B areas:



B. The Project Violates the Federal Wild and Scenic River Act

3

The Lower American River area is the most heavily used recreation river in California, and its associated economic benefits are substantial as well—a 2006 study concluded that the Lower American River Parkway had a greater than \$364 million annual economic impact. The River and its riparian forest are an incredible resource that provides recreational and educational opportunities for numerous people in the region. It is impossible to overstate just how important the River’s forest is to so many people due to its location, its quality, its beauty, and what it supports. But it can only continue to provide that value if the forest is protected, which is why the River was designated under the Wild and Scenic River Act. As discussed below, because this Project would cause substantial damage to the River’s condition and values, the Project violates the Act’s core mandates and must therefore be revised.

1. The proposed rip-rapping violates the Wild and Scenic River Act’s “free-flowing” requirement

4

The Wild and Scenic River Act states that designated rivers such as the lower American “shall be preserved in free-flowing condition, . . . and their immediate environments shall be protected for the benefit and enjoyment of present and future generations.”² The Act defines “free-flowing” as “existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway.”³ As discussed in *Ctr. for Biological Diversity v. Delgado*: “The statute provides that the existence of minor modifications to a river’s free flow

² 16 U.S.C. § 1271

³ 16 U.S.C. § 1286(b)

should not prevent designation of the river, but also states that once a river is designated no further modifications should be constructed.”⁴ Because Contracts 3B and 4B propose to modify the River with extensive rip-rapping, the Project violates the Wild and Scenic River Act and must therefore be changed to comply with the Act.

5 Rip-rap is particularly problematic because it is now (as compared to when the Wild and Scenic River Act was passed) even more understood that not only is rip-rap harmful to a river and its riparian environment, rip-rap can be ineffective. For instance, as discussed in “Engineering with Nature,” while “[r]iprap, or hard armoring, is the traditional response to controlling and minimizing erosion along shorelines or riverbanks, . . . [t]he very nature of having to repair [riprap] facilities counters the popular engineering belief that riprap is the best solution for mitigating stream bank erosion.”⁵

6 Moreover, other options exist that can address both safety and environmental protection. “[W]e can manipulate streams and rivers without completely overriding nature’s design, that indeed, it is possible to work hand in hand with nature to make living by the water not only viable, but much safer and secure in the long run.”⁶ “Finding methods of restricting riverbank erosion while allowing natural processes to function normally is just one important step in achieving equilibrium with our environment and investing smartly for our future.”⁷ This nature-based approach has been promoted at the highest levels—in 2022, the White House issued a press release advancing nature-based solutions.⁸ It is therefore imperative that the lead agencies find alternative solutions that do not contradict the Wild and Scenic River Act.

7 The lead agencies for this Project have previously stated that the “proposed bank protection and launchable rock trench measures are the only two measures that will address the significant erosion problem on the American River,” and “[o]ther measures were eliminated from consideration because the river velocities render them infeasible.”⁹ Not only are these statements eight years old, conclusory, and unsupported for the Project area, new studies regarding the Lower American River further demonstrate why the Project should be reconsidered and changed to protect the River and its associated riparian forest.¹⁰ The new information and policies must be addressed because, for instance, it found that “when trees were accounted for in large-eddy simulations, a drastic effect on redistributing the high-velocity flow away from the banks and

⁴ No. C 01-4835 PJH, 2003 U.S. Dist. LEXIS 21885, *41-43 (N.D. Cal. June 19, 2003)

⁵ Engineering With Nature: Alternative Techniques to Riprap Bank Stabilization, Federal Emergency Management Agency, January 2009

⁶ Id.

⁷ Id.

⁸ <https://www.whitehouse.gov/briefing-room/statements-releases/2022/11/08/fact-sheet-biden-%E2%81%A0harris-administration-announces-roadmap-for-nature-based-solutions-to-fight-climate-change-strengthen-communities-and-support-local-economies/>; see also Executive Order 14072, <https://www.govinfo.gov/content/pkg/DCPD-202200306/pdf/DCPD-202200306.pdf>

⁹ 2016 FEIS/FEIR, Appendix F

¹⁰ 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*. [https://doi.org/10.1061/\(ASCE\)HY.1943-7900.0001912](https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912); 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>

increasing its magnitude near the center of the American River was observed.”¹¹ Because trees significantly reduce velocity flow along banks, while increasing velocities in the center, trees should be protected, not destroyed, for flood protection. In addition, when trees are left in place, their roots hold the soil together, thereby improving resistance to erosion.

8 The SEIS/SEIR does not address the 2014 Water Resources Reform and Development Act (WRRDA) amendments which included provisions to prevent the destruction of vegetation on levees which had occurred under earlier outdated Corps guidelines and policies. Specifically, WRRDA Section 3013 requires the Secretary of the Army to, among other things, “carry out a comprehensive review of the guidelines [Corps of Engineers policy guidelines for management of vegetation on levees] in order to determine whether current Federal policy relating to levee vegetation is appropriate for all regions of the United States.”¹² Section 3013(c) sets forth specific factors that the Secretary “shall consider” in carrying out the review including “the levee safety benefits that can be provided by woody vegetation; [] the preservation, protection, and enhancement of natural resources, including—[] the benefit of vegetation on levees in providing habitat for species of concern, including endangered, threatened, and candidate species . . .” Section 3013(f) requires that not later than 18 months after the date of enactment of WRRDA the Secretary shall “revise the guidelines based on the results of the review. . .” As most relevant here, section 3013(g)(1) mandates: “Until the date on which revisions to the guidelines are adopted in accordance with subsection (f), the Secretary shall not require the removal of existing vegetation as a condition or requirement for any approval or funding of a project, or any other action, *unless the specific vegetation has been demonstrated to present an unacceptable safety risk.*”¹³ Here, especially in light of the new studies identified above, not only has it not been demonstrated that the trees to be removed in the Project area present an unacceptable risk, the new policies and information show that trees can be beneficial to addressing safety. This is yet another reason why it is imperative that the Project not be allowed to harm a Wild and Scenic River.

9 Importantly, we are unable to find in the Project documents any cohesive discussion of the data and information addressing why such destructive choices were made to address erosion in the Project area, especially since the area is a protected area within a Wild and Scenic River and contains numerous trees that provide natural erosion protection. Instead, much of the documentation shows the choices made are outdated and unsupported by site-specific data for the Project area. Moreover, the documents speak to the need to conduct further soil and geological analysis, such as more boring holes for analysis due to a “high degree of variability in the bed materials,” “to assure continuity of various layers,” and that “interpretations made of connecting the dots between borings could be erroneous.” In addition, the area near the entrance of SARA Park contains significant amounts of erosion-resistant clay hardpan, which the technical documents refer to as the “Pleistocene Fair Oaks Formation,” and which the documents indicate do not present a serious erosion issue. And, as discussed above, trees can enhance

10

¹¹ 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*. [https://doi.org/10.1061/\(ASCE\)HY.1943-7900.0001912](https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912)

¹² Public Law 113–121, 128 STAT. at 1284-87

¹³ Public Law 113–121, 128 Stat. at 1287 (emphasis added)

erosion protection. This information, as well as the detailed submissions from Bill Avery,¹⁴ Joshua Thomas,¹⁵ Gerald Djuth, Bill Brattain,¹⁶ and others show the necessity to explore nature-based alternatives that protect and enhance on-site trees instead of removing them to introduce massive amounts of rock.

2. The Project violates the Wild and Scenic River Act's mandate to "protect and enhance" river values

11 The Wild and Scenic River Act states that designated rivers such as the Lower American "possess outstandingly remarkable scenic, recreational, geologic, fish and wildlife, historic, cultural, or other similar values," and must be administered so as to "protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public use and enjoyment of these values."¹⁷

The Lower American River was determined to have outstandingly remarkable fishery and recreation values. As explained in the 1980 FEIS regarding the Lower American River's designation, the River and its adjoining riparian lands offer "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."¹⁸ The 1980 FEIS notes that the River "is lined with lush riparian growth that includes walnut, oak, cottonwood, and sycamore trees," and that this forest supports numerous birds and other wildlife despite the close proximity to a major urban area.¹⁹ As discussed in *EDF, Inc. v. East Bay Mun. Util. Dist.*,²⁰ "The riparian vegetation acts as a buffer between the Lower American River and the surrounding urban development. This vegetation, together with the river itself, are the most prominent features of the Parkway, and contribute greatly to the recreational experiences there. Many species of wildlife use the riparian vegetation for sources of food, cover, nesting sites, roosting areas and migratory corridors. Riparian vegetation is recognized by ecologists as being among the most productive wildlife habitat in the state."²⁰

The 3B/4B Project does not "protect and enhance" the Lower American River's fishery and recreational values, and the Project will "substantially interfere with public use and enjoyment of these values." For instance, the Project will not only destroy important riparian forest that many people enjoy for hiking, wildlife-watching, and shade, the Project will simultaneously eliminate fishing access, popular beaches, trails, small watercraft access, and swimming areas, such as

¹⁴ See Exhibit B

¹⁵ See Exhibit C

¹⁶ See Exhibit D

¹⁷ 16 U.S.C. §§ 1271, 1281

¹⁸ See Final Environmental Impact Statement, Proposed Designation of Five California Rivers in the National Wild and Scenic Rivers System, December 1980; see also Evaluation Report on the Eligibility of Five California Rivers for Inclusion in the National Wild & Scenic Rivers System; *EDF, Inc. v. East Bay Mun. Util. Dist.*, 1990 Cal. Super. LEXIS 7, *12 ("The American River Parkway is unique among urban rivers the United States. Running through the center of the Sacramento metropolitan area, the river and parkway provide a public recreational resource of great value and regional significance; it has no equivalent in California and few equivalents in this country.")

¹⁹ *Id.*

²⁰ 1990 Cal. Super. LEXIS 7, *14-15

those depicted in the pictures and map identified above. This will be caused primarily by the construction of “approximately 1.8 miles of launchable rock toe, launchable trench, and bank protection” with respect to 3B North, “approximately 1.5 miles of launchable rock toe (Figure 3.5.2-13), launchable trench, bank protection, and tie backs” with respect to 3B South,²¹ and tree removal associated with 4B.²²

12

The SEIR/SEIS proposes changes to the 2016 proposal that will increase the harm to the River’s values. As stated in the SEIR/SEIS, because the “2016 ARCF GRR Final EIS/EIR only analyzed launchable trench and bank protection (Figure 3.5.2-2) as erosion protection methods, [t]he [2023] design refinements include additional erosion protection methods (launchable rock toe protection and tie backs) throughout the American River Erosion Contract C3B North and South project sites as well as staging areas, haul routes, and additional areas within the construction footprint.”²³ The 2016 FEIS/FEIR also appears to have intended to protect more vegetation. It states that bank protection targets “[s]mall vegetation and loose materials” for removal whereas “[i]n most cases, large vegetation would be permitted to remain at these sites.”²⁴ The 2016 documents further note that “removal of waterside vegetation during construction . . . would primarily consist of shrubby vegetation and grasses, which do not significantly contribute to shade, [and] [t]he larger trees in the bank protection footprint, which are the primary contributors to shade, would be protected in place.”²⁵ According to the 2016 documents, the Project would “not require . . . the disruption of shaded riparian habitat” when creating “launchable rock trench”,²⁶ and “erosion measures on the American River are not considered structural fixes, as these measures do not impact the structure of the levee, therefore the vegetation in this portion of the project would not be addressed under the ARCF project [and] [b]ank erosion measures therefore will allow the vegetation to remain.”²⁷ In the SEIR/SEIS, Figure 3.5.2-2 (Launchable Trench and Bank Protection Designs) appears to show riparian trees largely remaining where the described type of actions take place.

13

In 2023, however, launchable toes and tiebacks were added that, as shown in Figure 3.5.2-13, and as stated in the documents, “will result in substantial tree removal to construct levee improvements.”²⁸ Despite this, the SEIS/SEIR asserts that “the new additional erosion protection methods for American River Erosion Contract 3B North and South are similar enough in method and location on the levee to the erosion protection methods described in [2016] that the visual impact from the design refinements would be similar to what was already analyzed in [2016]”²⁹ This assertion makes no sense in light of the significant harm that the new proposals include, and the assertions made in 2016 regarding very minimal tree loss. Unfortunately, the documents (both 2016 and 2023) nowhere state how many trees are likely to be lost due to the Project, but other documents (not available on the Project page, such as the December 12, 2023 presentation

²¹ SEIS/SEIR at 3-26

²² Very little information is offered regarding Contract 4B, especially regarding its potential impacts to large trees and heritage trees and other native vegetation.

²³ SEIS/SEIR at 3-26

²⁴ 2016 FEIS/FEIR at 35

²⁵ 2016 FEIS/FEIR at 104

²⁶ 2016 FEIS/FEIR, Appendix E at 65

²⁷ 2016 FEIS/FEIR at 139

²⁸ SEIS/SEIR at 4-192

²⁹ SEIS/SEIR at 3.1-24

13
cont'd

showing 522 trees to be removed in 3B South alone),³⁰ as well as the completed activities to the west, show that entire areas will be virtually clear-cut, or at least most trees lost, including many large trees and even heritage trees. This means that the Project documents fail to provide the information necessary for the public to meaningfully understand what will be lost—a few trees, many trees, one heritage oak, ten heritage oaks—we don’t know because the Project documents don’t explain. Likewise, nowhere does the SEIS/SEIR explain, or provide site-specific data to support, the erosion methods chosen in the Project area.

Further confusion is found in documents not included in the SEIS/SEIR or the Project webpage. A December 12, 2023 document states that 3B South “[a]voids most large trees,” but also states that 522 trees will be removed in the 3B South section—no explanation is given as to how many of the 522 trees are considered large, nor is “large” defined. Moreover, the loss of just a single large tree, such as any of the giant oaks in the Project area, can itself be significant, yet thus far it is not possible to tell which trees of which sizes will be eliminated by the Project. 522 is a very significant number of trees, regardless of their size, especially in an ecologically- and recreationally-significant city environment, and this information contradicts the assurances given in the 2016 documents that very few trees would need to be removed or harmed.

14

Removing so many trees, and introducing so much rock, in the Project area will have devastating effects on the fishery value of the River. By eliminating canopy cover and shade, the water temperature of the area will be increased, harming the habitat of anadromous fish species. In addition, rip-rap reduces habitat complexity and diversity, and breaks up habitat connectivity in an area where such habitat is already limited.

15

The SEIS/SEIR acknowledges that the Project will substantially interfere with the River’s recreational value: “The short-term significant unavoidable impacts related to recreational resources cannot be reduced to a less-than-significant level with implementation of mitigation measures listed in Section 3.14.6 of the ARCF GRR Final EIS/EIR. Disturbances associated with construction work and hauling are unavoidable effects of the work to be completed and consequentially the significant impact on recreation cannot be avoided.”³¹ In addition, the Project will also have severe long-term impacts on recreation. The loss of trees, and introduction of rock, will either permanently, or for a very long time (decades to centuries), harm the ability of people to walk, hike, wildlife-watch, fish, visit beaches or trails or swimming areas, or enjoy a shaded environment.

Because the Project fails to adhere to the Wild and Scenic River Act’s “protect and enhance” mandate, it cannot go forward as currently proposed. Modifications must be made to ensure that the Project area remains meaningfully useable for recreation including fishing access, beach access, swimming, wading, hiking, wildlife-watching, and shade. For example, rather than eliminating over 600 trees in the Project area (as shown in the December 2023 document with respect to 3B North and 3B South), the vast majority of trees should be allowed to remain in the Project area to support the areas’ recreational and fishery values.

³⁰ <https://waterforum.org/wp-content/uploads/LARTF-Dec-2023-Slides.pdf>

³¹ SEIS/SEIR at 4-115

16 Furthermore, from a safety perspective, new information (e.g., the above-mentioned published studies) shows that the trees that would be eliminated by the Project are actually of great importance when determining how to address erosion.³² The 2023 study notes that “in addition to the results obtained previously by Flora and Khosronejad (2021) showing that vegetation will redistribute the flow away from the banks and into the main flow of the channel, the importance of incorporating vegetation into the LES was shown in this new study by highlighting its influence on the water surface profile. By modelling the free surface, one can easily see how including the vegetation in the numerical model increases the backwater in a river.”³³ “This study has underscored the significance of integrating vegetation effects into high-fidelity numerical models, shedding light on the need to consider vegetation in advanced simulations. Building upon previous research (Flora et al., 2021b) conducted at the study site, which revealed the influence of bank vegetation on redistributing the flow and modifying bed shear stress, our study employed a multiphase LES to accurately model the water surface. The simulation demonstrated that the trees lining the riverbanks imparted substantial flow resistance and produced significant backwater in the river. These findings further emphasize the importance of accounting for vegetation in such advanced simulations.”³⁴

The new circumstances/information is relevant to environmental concerns, as well as the Proposed Action and its impacts, because this new information means that the destruction that the Project would cause is not necessary, and in fact may be counterproductive to the important mission of ensuring that Sacramento is protected from flooding.³⁵ Furthermore, this information means that alternatives previously found not to be feasible are in fact feasible, and would substantially reduce significant effects of the project.³⁶ For instance, the new information shows that keeping trees, rather than eliminating them, is not only feasible, it is helpful for the Project goals. Likewise, alternatives which are considerably different from those analyzed (e.g., protecting most trees) would substantially reduce one or more significant effects on the environment. These feasible alternatives should be explored and adopted to avoid violations of the Wild and Scenic River Act (as well as CEQA and NEPA as discussed below).

17 The SEIS/SEIR asserts that the “design of the erosion protection features, specifically the planting benches and soil-filled revetment, allows for the site to be revegetated and used for onsite mitigation for riparian habitat and salmonid habitat.”³⁷ This is deeply flawed because mature riparian habitat with canopy cover will take many decades, and large heritage trees centuries, to actually return, if they return at all. For the 3B and 4B areas to retain their fishery and recreation values, the vast majority of trees must be left in place. There is also no discussion as to long-term maintenance of these planted tree areas and whether they will be able to grow to a size to be remotely comparable to the trees removed, given that some trees will be planted on

³² 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*. [https://doi.org/10.1061/\(ASCE\)HY.1943-7900.0001912](https://doi.org/10.1061/(ASCE)HY.1943-7900.0001912)

³³ 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>.

³⁴ Id.

³⁵ 40 C.F.R. § 1502.9

³⁶ 14 C.C.R. § 15162

³⁷ SEIS/SEIR at 3-38

top of rock benches. No information is provided to explain how a complex mature forest will be able to return after the area is denuded.

18 Also flawed is the assertion in the SEIS/SEIR that impacts to recreation are “Long-term Less than Significant with Mitigation Incorporated,” or “Long-term No Impact.” As discussed above, there are permanent and substantial short and long-term impacts—beaches lost, swimming areas lost, trails lost, shade lost, small watercraft access points lost, wildlife-watching lost, fishery habitat lost, fishing access lost—for up to centuries even if the forest comes back some day post-project. The SEIS/SEIR claims that “[i]n the long term, American River Erosion Contract 3B would result in less-than-significant impacts after construction activities are complete *and vegetation matures*” (emphasis added),³⁸ but the reality is that for a riparian forest to reach maturity can take centuries. The loss of mature forest therefore cannot be overstated, and the Wild and Scenic River Act does not allow such overwhelming interference with public use and enjoyment of the riparian forest of the Lower American River. Moreover, the rock being introduced is permanent, not temporary, and will therefore have long-term impacts as well.

19 The SEIS/SEIR also asserts that “the maturation of the riparian vegetation will return the visual quality of the project area to pre-construction conditions.”³⁹ This assertion too is highly misleading, as again, it will take up to centuries for that outcome to actually occur, if it occurs at all—the impacted area contains mature riparian forest with canopy cover and many large, old trees that can require centuries to return. Examination of new plantings in the River Park area and elsewhere associated with other segments of the levee work shows that the plantings have largely been done in rows, like in an orchard, which is not at all like the natural riparian forest that currently provides amenities to wildlife and the public.

20 The Project documents also seem to imply that the Project’s damage to riparian forest is allowable because otherwise the forest at issue will be destroyed by flooding. While certainly flooding impacts riparian vegetation, it does not eliminate it like the Project would. The riparian forests of the Lower American have grown and evolved with flooding events, and the many large, old trees in the Project area are proof that serious flooding will not likely eliminate these trees. Some of these trees may have existed prior to the existence of California as a political and cultural entity, and have survived and thrived through and despite the most damaging and infamous of California’s recorded storms, such as those in the 1850s.

21 The Project also does not follow the Corps’ guidance that for “flood damage reduction projects, the goal of landscape planting is to minimize and/or mitigate negative impacts to aesthetic, environmental, and ecological conditions, such that post project conditions are equal to, or better than, pre-project conditions.”⁴⁰ Here, the post-project conditions will be dramatically worse than pre-project due to the extreme loss of riparian trees and vegetation, and introduction of rock. The Corps is also not doing what it said it would do in 2016: “if some sort of bank protection is

³⁸ SEIS/SEIR at 4-118

³⁹ SEIS/SEIR at 4-143

⁴⁰ Engineering and Design, Guidelines For Landscape Planting And Vegetation Management At Levees, Floodwalls, Embankment Dams, And Appurtenant Structures

21
cont'd

determined to be necessary, other options to reduce impacts, including bioengineering measures, will be analyzed.”⁴¹ Other options must still be analyzed.

Tellingly, the work recently performed downriver, to the west near Howe Avenue and the River Park neighborhood, shows what the future of the existing riparian forest will likely be if the Project goes forward under current design—a River without a nuanced shoreline and areas in which to swim/wade, hike, fish, see wildlife, or find enjoyment. The 3B and 4B area is one of the most important areas of the Lower American River, accessible and serving the municipal core, and must be allowed to remain that way under the Wild and Scenic River Act.

3. The Project violates the American River Parkway Plan

22

The Project will also violate the American River Parkway Plan. For instance, the Plan requires agencies to “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 Project does not meet that requirement because it will destroy, rather than protect or enhance, the native willow, cottonwood, and valley oak-dominated riparian forest in the Project area. Likewise, the Project violates the Plan’s requirements to (1) “ensure the protection of the Parkway’s resources, its environmental quality and natural values,” (2) “identify, enhance and protect areas where maintaining riparian vegetation will benefit the aquatic and terrestrial resources [and] current shaded riverine aquatic habitat,” (3) “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,” and (4) provide “passive, unstructured water-enhanced recreation activities which are appropriate in a natural environment, and which are not normally provided by other County recreational facilities.”

The SEIS asserts that while “American River Contract 3B has some work within areas designated as conservation areas in the 2023 American River Parkway Resource Management Plan,” “[b]ecause most conservation areas being impacted by the Proposed Action would become mitigation once work is complete, there would be a less than significant impact on these conservation areas.”⁴² This assertion is incorrect. The protected areas will be losing significant vegetation, including large mature trees that provide substantial shade for fish and wildlife and ensure that beaches and swimming areas and walking trails are what they are. Again, mitigation will not be meaningful for potentially centuries due to the loss of over 600 trees in the Project area.

Finally, it is important to recognize that the Parkway Plan’s statement that “vegetation removal for flood control purposes, shall be designed to avoid or minimize adverse impacts on the Parkway” cannot be used to override the Wild and Scenic River Act’s mandates. In other words, the Project is required to “avoid or minimize adverse impacts” in order to meet the standards of the Act. It is therefore imperative that the Project be redesigned to achieve that outcome.

⁴¹ 2016 FEIS/FEIR, Appendix F

⁴² SEIS/SEIR at 4-130

C. The Project Violates the California Wild and Scenic River Act

23 Contracts 3B and 4B are wholly within the California Wild and Scenic River Act system and must thus comply with this Act as well.⁴³ The Act provides that “[i]t is the policy of the State of California that certain rivers which possess extraordinary scenic, recreational, fishery or wildlife values, shall be preserved in their free-flowing state, together with their immediate environments, for the benefit and enjoyment of the people of the state[,]” and that “such use of these rivers is the highest and most beneficial use.”⁴⁴ The modification of miles of river shoreline to angular rock bank “armoring” substantially harms the “scenic, recreational, fishery or wildlife values” of the Lower American River and is thus inconsistent with the CWSRA.⁴⁵ In addition, under section 5093.60 of the Act, the lower American River “shall be administered so as to protect and enhance the values for which it was included in the system”⁴⁶ Here, Contract 3B and 4B conflict with fish protection, and public use and enjoyment, for all the reasons discussed above—the Project will eliminate shade, as well as beaches and swimming areas, and will damage habitat and the ability to enjoy the area’s wildlife and aesthetics. This direct and adverse harm to the River’s values is substantial as it will occur in a popular, heavily recreated area. The Project must therefore be revised to protect the River’s highest and most beneficial uses.

D. The SEIR Violates CEQA

24 CEQA requires that lead agencies “not approve projects as proposed if there are feasible alternatives or feasible mitigation measures which will avoid or substantially lessen the significant environmental effects of such projects.”⁴⁷ CEQA and the CEQA Guidelines also require that an EIR’s mitigation measures be fully enforceable through legally binding means.⁴⁸ As discussed below, the SEIS/SEIR fails to comply with CEQA because it lacks the information and analysis necessary to adequately avoid and mitigate the Project’s harmful impacts, and no meaningful alternatives to the Project’s destruction were considered or evaluated despite new information and new policies.

1. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project’s Significant Adverse Recreational Impacts

The Project documents do not adequately disclose, and thus do not meaningfully analyze, many of the harmful impacts to recreational use of the Project area. The 2016 documents assert for instance that the “primary recreational feature within the American River Parkway (Parkway)

⁴³ See Pub. Res. Code § 5093.54(e)

⁴⁴ Pub. Res. Code § 5093.50

⁴⁵ See also Opinion No. SO 76-7, Office of the Attorney General (1977)

⁴⁶ The importance of protecting the lower American River’s values is further emphasized in section 5093.61 of the Act which states that “[a]ll departments and agencies of the state shall exercise their powers granted under any other provision of law in a manner that protects the free-flowing state of each component of the system and the extraordinary values for which each component was included in the system.” Pub. Res. Code § 5093.6

⁴⁷ CEQA Guidelines §§ 15092(b), 15043, 15126.4(a)(1).

⁴⁸ Pub. Res. Code § 21081 (“A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.”; CEQA Guidelines § 15126.4(a)(2) (“Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments.”))

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which could be affected by the project is the Jedediah Smith Recreation Trail,”⁴⁹ but in fact the primary impact will be the short and long-term recreational harm caused by loss of beaches, fishing access, swimming areas, hiking and walking trails, wildlife-watching, shade, and riparian trees. The 2023 documents likewise fail to meaningfully address recreational impacts as they too do not discuss what it means to recreation to lose fishing access, beaches, trails, swimming areas, wildlife-watching, canopy cover, large trees, and shade in the Project area—all of these activities will be either permanently lost or lost for many decades or even centuries due to the time it takes for a mature forest with large trees and canopy cover to grow back, if they grow back at all. What impacts will the community experience? Because the documents do not discuss this loss, nor the seriousness of it (despite numerous comments regarding the 2016 documents concerning these sorts of recreational features and concerns over their loss), the public was not properly informed as to what the Project’s impacts actually are.

The proposed rip-rap and associated actions will forever change the character of the Project area and yet the Project documents imply that no significant long-term impacts exist because trees will eventually grow back someday. It is simply not true that “after all construction activities are completed and sites are re-opened to the public, long-term impacts would be less than significant.”⁵⁰ The destruction to the riparian forest and installation of tons of rock armoring will in fact cause long-term impacts to recreation because for many decades, if not centuries or permanently, the public will not be able to meaningfully use the 3B area for fishing, swimming, beaches, hiking and walking, wildlife-watching, shade, or relaxation. These significant impacts to recreation are all the more problematic given that the area is meant to be protected under the Wild and Scenic River Acts for the River’s “outstandingly remarkable” value for recreation.

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The SEIS/SEIR does note that “[o]ther recreational activities within the American River Parkway include walking, cycling, running, hiking, bird watching, wildlife viewing, and horse riding,”⁵¹ but there is no information, discussion, or analysis provided as to what will happen to those activities due to the Project. Instead, the loss of these important activities is dismissed (without discussion) in the short term as “a direct significant impact that cannot be mitigated to a less-than-significant level,” and ignored as to long-term impacts. The SEIS/SEIR asserts that “until vegetation reestablishes, wildlife and bird view would be impacted as habitat would be temporarily impacted,”⁵² but even this is incorrect because what is meant by “temporarily” is not discussed, and the fact of the matter is that much of the wildlife cannot return to the area until mature forest reestablishes, which can take many decades to centuries.

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Moreover, the few passing references to these recreational resources are limited to impacts to vegetation, but permanent major impacts to the shoreline, including loss of access points to swim, fish, put in small watercraft, or just enjoy the view, are absent, despite their importance to the community and official recognition of these resources as described above. The lack of

⁴⁹ The SEIS/SEIR acknowledges this as well: “The environmental setting described in Section 3.14.1 of the ARCF GRR FEIS/EIR covering land-based recreational resources is generally applicable to the land-based recreational resources found within the project sites. Generally, it describes the primary recreational resource that could be affected by the flood risk reduction work as bicycling.”

⁵⁰ SEIS/SEIR at 2.2-23

⁵¹ SEIS/SEIR at 2.2-2

⁵² SEIS/SEIR at 2.2-21

analysis and consideration of each of these resources is distressing to the great many members of the public who cherish them.

As an example of this lack of analysis of the recreational features of the Project Area, note the “social trails,” beaches, and other areas depicted on the map in Exhibit A to this letter. There are miles of trails that are routinely used by members of the public, yet these trails were not inventoried and were not discussed in the SEIS/SEIR.⁵³ If the Project is meant to avoid and mitigate for effects, how can the Project avoid and mitigate effects on recreational assets such as social walking trails, beaches, fishing spots, and the like if they were not inventoried, let alone analyzed?

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The community is also concerned that in addition to the armoring of miles of shoreline, making recreation in those areas difficult or impossible, it may well be unsafe. Anecdotal reports indicate that very few people choose to recreate along shorelines that have been armored. Such shorelines are unwelcoming, uncomfortable, ugly, and unsafe. If the public abandons use of the shoreline for these or related reasons, the Project has effectively eliminated these sections from the public domain as a recreational resource. This needs to be discussed and avoided.

28

The substantial impacts to recreation are compounded by the fact that “many staging areas for American River Erosion Contract 3B North and South and American River Erosion Contract 4B are public parks or recreational areas,” and “these staging areas could be needed over multiple years.”⁵⁴ In other words, not only will recreation in a wild and scenic river area be substantially interfered with, local parks will be harmed in the process of that damage. This is all the more reason to avoid the harm to riparian forest on the Lower American River in the first place, and to instead adopt measures that do not require such destruction.

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Recreation is also critically important to public health, yet this is nowhere addressed in the SEIS/SEIR.⁵⁵ Many people come to the 3B Project area for their physical and mental well-being, and that is especially so because of the close proximity of the area to urban Sacramento. Research has shown that “green exercise” may confer mental health benefits in addition to improving physical health. For instance, it was found that exercising with views of nature led to more consistent mental health improvements.⁵⁶ Similarly, natural park settings help decrease anger, anxiety, and depression; and increase restoration and tranquility.⁵⁷ Just the simple act of viewing nature has shown to provide physiological restoration, reduce stress and provide

⁵³ Numerous community groups commented on the 2016 environmental documentation about these recreational resources and the need to protect them, so it is perplexing to see them ignored in the 2023 documentation. See, e.g., February 22, 2016 letter from Matthew Carr et al, ARCF GRR Final EIS/EIR 2016, Appendix F, PDF page 46. (“The Final EIS/EIR does not adequately characterize the many varied uses of the river and Parkway.”) Ironically, the SEIS/SEIR mentions the bike path many times, but impacts to the bike path, while serious, are not nearly as substantial as the impacts to the other recreational amenities that will be impacted but were not analyzed. This point about undue focus on the bike path was also made in 2016.

⁵⁴ SEIS/SEIR at 2.2-22

⁵⁵ See, e.g., Urban River Parkways, An Essential Tool for Public Health (July 2014)

⁵⁶ Barton, J and Rogerson, M. 2017. The importance of greenspace for mental health. BJPsych International, 14 (4), pp. 79-81. DOI <https://doi.org/10.1192/s2056474000002051>

⁵⁷ Pretty J, Peacock J, Sellens M, Griffin M. 2005. The mental and physical health outcomes of green exercise. Int J Environ Health Res. 15(5):319-37. doi: 10.1080/09603120500155963. PMID: 16416750

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calming effects.⁵⁸ Maintaining a connection with nature is particularly valuable in reducing stress that accompanies urban living,⁵⁹ and scientific studies confirm that regular engagement with green spaces is linked with better mental health and well-being.⁶⁰ More greenery, access to nearby natural areas, and green exercise, positively correlate with less stress, less sadness, more satisfaction with life, and overall better mental health.⁶¹ Morita et al. found that depression decreased and liveliness increased with forest immersion.⁶² For people having high initial stress levels, exposure to forest settings produced lower measures of anxiety, depression, anger, confusion, and fatigue, and forest walking increased happiness more than walking in a gymnasium, with meditative walking in the forest being the most effective.⁶³ 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.⁶⁴

The loss of riparian forest in the Project area will detrimentally impact the health of the many people who use this particular area to relax, hike, run, walk, watch wildlife, swim, fish, and boat. This is especially so given how few areas nearby to Sacramento provide such opportunity for connection to nature, relaxation, and the many other ways that the area uniquely offers opportunities for physical activity and mental health sustenance. This is yet another important reason to protect the area's riparian forest. Again, the law requires, and the resource and community deserve, analysis of this and avoidance of these impacts.

30

With respect to cumulative impacts to recreation, the SEIS/SEIR states that "the Proposed Action would result in a considerable contribution to the short-term significant cumulative impact on recreation," but fails to address the long-term significant impacts in any meaningful way. This is a serious oversight given how much of the Lower American River's vegetation is being harmed. Along the south bank of the river closest to the City of Sacramento, with all work in the GRR included, there are miles and miles of riverbank where the public cannot recreate, potentially for

⁵⁸ Grinde B, Patil GG. 2009. Biophilia: does visual contact with nature impact on health and well-being? *Int J Environ Res Public Health*. 6(9):2332-43. doi: 10.3390/ijerph6092332; Dannenberg AL, Jackson RJ, Frumkin H, Schieber RA, Pratt M, Kochtitzky C, Tilson HH. 2003. The impact of community design and land-use choices on public health: a scientific research agenda. *Am J Public Health*. 93(9):1500-8. doi: 10.2105/ajph.93.9.1500.

⁵⁹ Vining, J. 2003. The Connection to Other Animals and Caring for Nature. *Human Ecology Review*, 10(2), 87-99. <http://www.jstor.org/stable/24706957>

⁶⁰ Maller, C., Townsend, M., St Leger, L., Henderson Wilson, C., Pryor, A., Prosser, L. and Moore, M. 2009. *Healthy Parks, Healthy People: The Health Benefits of Contact with Nature in a Park Context*

⁶¹ World Health Organization. 2011. *Investing in Mental Health*; Kuo, M. 2011. *Parks and Other Green Environments: 'Essential Components of a Healthy Human Habitat'*. *Australasian Parks and Leisure*, 14(1); Barton, S. 2008. *Human Benefits of Green Spaces*

⁶² Morita, E.; Fukuda, S.; Nagano, J.; Hamajima, N.; Yamamoto, H.; Iwai, Y.; Nakashima, T.; Ohira, H.; Shirakawa, T. 2007. Psychological effects of forest environments on healthy adults: Shinrin-yoku (forest-air bathing, walking) as a possible method of stress reduction. *Public Health* 121, 54-63

⁶³ Park, B.-J.; Furuya, K.; Kasetani, T.; Takayama, N.; Kagawa, T.; Miyazaki, Y. 2011. Relationship between psychological responses and physical environments in forest settings. *Landsc. Urban Plan* 102, 24-32; Shin, Y.-K.; Kim, D.J.; Jung-Choi, K.; Son, Y.; Koo, J.-W.; Min, J.-A.; Chae, J.-H. 2013. Differences of psychological effects between meditative and athletic walking in a forest and gymnasium. *Scand. J. For. Res.* 28, 64-72

⁶⁴ *Mayors' Guide to Fighting Childhood Obesity*. 2007. The United States Conference of Mayors; *Preventing childhood obesity: the need to create healthy places*. A Cities and Communities Health Report; *Space oriented Children's Policy: Creating Child friendly Communities to Improve Children's Well-being*

decades or permanently. The cumulative impacts of this many miles of a key recreational resource must be addressed.

2. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Significant Adverse Biological Impacts

31 The SEIS/SEIR fails to adequately describe the importance of the Project area's habitats in supporting vast biodiversity, including special-status animals and plants, in an otherwise urban landscape. Riparian habitat is unfortunately rare to begin with and not only supports disproportionately high levels of biodiversity, it is critical for wildlife connectivity. It is also important for many ecosystem services that communities rely on for safety and economic stability, including water quality protection, carbon sequestration, erosion control, and soil retention. Riparian ecosystems have long been recognized as biodiversity hotspots performing important ecological functions such as the shade and erosion control that riparian vegetation provides. Removal and degradation of riparian areas have been identified as major drivers of declines in California's freshwater and anadromous fish.

32 Importantly here, the riparian habitat at issue represents the primary corridor for wildlife movement, as outside the Project area, the land is largely developed and lacking cover. In other words, once the riparian forest at issue is lost, there is nothing else available nearby. The SEIS/SEIR effectively dismisses the Project area's importance for local biodiversity and connectivity, and thus fails to adequately describe and assess what the loss of this habitat means in this particular situation. Every single patch of riparian forest along the Lower American River is critical in light of the existing baseline, and thus cannot be mitigated with riparian forest decades to centuries in the future. This is especially so given that habitat has already been severely diminished to the west by other levee projects.

The fact that this area acts as a narrow, linear wildlife corridor was not discussed, and thus neither were alternatives or mitigation for that fact. To put a fine point on it, for wildlife to travel from the forest area near Howe Avenue to the forest area upstream of the Mayhew Drain, i.e., from downstream of the project area to upstream of the project area, it will have to traverse a stretch of miles that is, for many years, largely devoid of vegetation, which means no cover. Habitat loss and fragmentation like is happening with this Project (and others nearby) can lead to local extirpation, and the SEIS/SEIR likewise fails to address the importance of riparian habitat in the context of a changing climate –much like the humans that recreate in the shade of this forest, wildlife too relies on the canopy cover and shade to survive the heat.

33 The SEIR/SEIS states that “approximately 65 acres of riparian habitat would be removed” and that it will be mitigated “by planting new riparian habitat onsite or at USFWS approved mitigation sites.”⁶⁵ What is left unclear is how much canopy cover and how many large trees will be lost, as that cannot be mitigated in light of the timetable for their reestablishment. It is critical that the public be told during the comment period what exactly will happen to medium and large-sized trees, especially the largest ones, because they are what matter most to the wildlife of the Project area. Instead, only vague and generic statements have been made about which large trees will remain in the Project area, and it is therefore difficult to know the extent of the damage to

⁶⁵ SEIS/SEIR at 4-186; in addition, “the loss of 80,825 linear feet of SRA habitat”

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the area's ecology. For example, the Project documents state a generic desire to "reduce impacts on vegetation and wildlife to the extent practicable," "reducing the impact footprint," "constructing bank protection rather than launchable rock trench whenever feasible," yet it appears that much of the shoreline will nonetheless be armored and over 600 trees removed despite their importance to wildlife. Many trees in the Project area have been here for over a century and provide habitat and cover for beavers, otters, deer, coyotes, and numerous bird species. As just a few examples, one large tree in the Project area can often be observed with 6-10 woodpeckers on it, owls and magpies are daily present in the large oaks, mergansers use the large trees for nesting, and otters are often observed near the shoreline.

34

The Project documents state that "the affects to biological resources would be less than significant because the new habitat would be similar to those removed over the 50-year life of the project."⁶⁶ This is unhelpful because wildlife needs habitat now, not 50 years from now, and the general area is already severely depleted of riparian habitat such that every acre lost is significant in the short term and long term. Riparian habitats support disproportionately high levels of biodiversity and are important for wildlife connectivity and yet the SEIS/SEIR assumes that mitigation that, at best, will arrive many decades in the future is good enough. It is not. Moreover, it can take much more than 50 years for the mature riparian forest to return, if it returns at all. In addition, the significant amount of rock being placed in the Project area will result in long-term/permanent loss of habitat and will make it difficult for wildlife to access the shoreline/river. There is also no guarantee that the installed forest will regrow per the expectations of the SEIS/SEIR, let alone to match the values that a mature forest brings.

35

The mitigation proposed is also presented in insufficient detail to meaningfully evaluate. For instance, mitigation measures VEG-1 and VEG-2, quoted and discussed below, as well as mitigation measure WATERS-1,⁶⁷ do not specify what specific measures will be taken, only that some measures will be taken, with a presentation of a list of possible mitigation measures. These unduly vague mitigation measures are inadequate as they prevent any meaningful evaluation of the Project and its impacts once the mitigation is implemented, whatever that mitigation might ultimately look like. The mitigation measures need to be presented in meaningful and sufficient detail at the time that the Project is considered to comply with CEQA. Approving the Project with only a vague, inchoate understanding of the mitigation is inappropriate. More detail is needed.

⁶⁶ SEIS/SEIR at 5-25

⁶⁷ Mitigation Measure "WATERS-1" is inappropriately devoid of detail, and states in its entirety:

In compliance with the CWA, the Project Partners will compensate for fill of State and Federally protected waters to ensure no net loss of functions and values. Water quality certification pursuant to Section 401 of the CWA will be obtained from the Central Valley RWQCB before starting project activities subject to Section 401. Any measures determined necessary during the permitting processes will be implemented, such that there is no net loss of functions and values of jurisdictional waters.

Mitigation may be accomplished through habitat replacement, enhancement of degraded habitat, off-site mitigation at an established mitigation bank, contribution of in-lieu fees, or other methods acceptable to the regulatory agencies, ensuring there is no net loss of waters of the United States. If compensation is provided through permittee-responsible mitigation with additional NEPA and CEQA documentation, a mitigation plan will be developed to detail appropriate compensation measures determined through consultation with USACE and Central Valley RWQCB. These measures will include methods for implementation, success criteria, monitoring and reporting protocols. SEIS/SEIR, Appendix B, at 4.1-41.

36

Furthermore, the cumulative impacts of this Project with others must be more carefully addressed. While this Project alone will have devastating impacts to fish and wildlife habitat, it is on top of already significant loss of habitat to the west. Again, any loss of riparian habitat is significant in light of its extreme rarity, and here there are multiple projects eliminating or degrading it along the Lower American River.

3. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Significant Visual Impacts

37

The Project area is renowned for being an area of beauty and respite from the urban world - the SEIS/SEIR notes that it is a “highly-valued, natural riparian woodland setting with a feeling of serenity amid a developed urban area.”⁶⁸ Parkway users come from near and far to experience the tranquility and see a natural environment that is uncommon elsewhere, especially in a city. These users experience the natural shoreline of the river while recreating along the shore (e.g., swimming, walking, wading, and fishing) and from the water (e.g., kayaking and swimming). The Proposed Action would fundamentally and permanently change the shoreline of the Project area, including miles of “shoreline armoring” also known as “rip-rap.” This sort of hard-armoring and related types of shoreline armoring run afoul of the public desire to keep the river “natural” as well as the state and federal Wild and Scenic River Acts’ policies against such hard-armoring. Given this, it is quite surprising that in the SEIR/SEIS there is (1) zero discussion of how and how much of the shoreline will be changed by the Proposed Action in terms of visual impacts, nor is there (2) any discussion of how these changes might be avoided, reduced, or mitigated, nor is there (3) any discussion about the cumulative impacts of shoreline armoring so many miles of the Project Area. This is especially surprising since many community groups expressed grave concern over this type of impact in their comments to the 2016 EIR/EIS eight years ago, and the Corps’ responses at that time were that the issue would be addressed by the SEIS/SEIR. It was not.

38

The SEIR/SEIS’ failure to acknowledge the significant visual impacts that the Proposed Action will have on the shoreline/banks of the river is especially concerning in light of the fact that these impacts are both significant and permanent. The public and decisionmakers are unable to meaningfully assess these impacts due to the failure of the SEIS/SEIR to discuss these significant, permanent changes to the natural character of the “Crown Jewel of Sacramento.” The public should not be left out of the discussion of such significant, permanent changes to the shoreline of one of the “Crown Jewels” of our state.

39

Second, the SEIS/SEIR contains insufficient detail to accurately assess the visual impact of the Project on the riparian forest. The SEIS/SEIR states that “[i]mpacts on scenic views along the American River would be less than significant over time once vegetation establishes, making impacts to scenic views from construction along the American River short-term significant and unavoidable.”⁶⁹ The SEIS/SEIR similarly asserts that “[l]oss of vegetation along the American River, due to removal and construction of levee improvements, will result in significant and unavoidable short-term effects on visual resources of the mature vegetation, but a minor long-term impact on visual resources because of trees left onsite and the addition of onsite mitigation

⁶⁸ SEIS/SEIR, Appendix B, at 3.1-1

⁶⁹ SEIS/SEIR, Appendix B, at 3.1-16

plantings.”⁷⁰ These conclusions are not accurate with respect to the 3B/4B Project area because they: (1) do not discuss the significant visual effects that will be caused by armoring and other changes to the river’s banks, and (2) inaccurately minimize the visual impact of removing over 600 trees, some of which are heritage oaks hundreds of years old and others which will take the better part of a human lifetime or more to mature.

40 The SEIS/SEIR also relies too heavily on two vaguely described mitigation measures, VEG-1 and VEG-2, to conclude that the Proposed Action will have a “less than significant” visual impact.⁷¹ The SEIS/SEIR fails to describe the mitigation measures in sufficient detail and it is impossible, for example, to assess how many of the centuries-old heritage oaks will be removed despite implementation of these mitigation measures. As another, it is also impossible to assess how much of the mitigation will be on-site. The SEIS/SEIR fails to describe the extent to which this area will be changed permanently due to mitigation being off-site. The community is entitled to know the extent of on-site mitigation and how it will be done more than is presented in the SEIS/SEIR. There is a very strong preference in the community for on-site mitigation due to the importance of this area for recreation and fish. In addition, mitigation measures miles downriver are not “on-site” mitigation, yet the SEIS/SEIR seems to suggest that it is.

41 Related, in the work done recently in the River Park neighborhood, mitigation measures VEG-1 and VEG-2 were purportedly implemented, but it appears that nearly all mature trees were removed from that section. Thus, the public is concerned as to how, exactly, these mitigation measures will be implemented in this Project area over time as claimed in the SEIS/SEIR.

42 Moreover, the SEIS/SEIR contains no meaningful information from which to assess what the post-Project area will look like with respect to “trees left onsite,” but based on other documents (e.g., the December powerpoint presentation), few trees will be left onsite. Therefore, the long-term impact on visual resources will likely be severe and significant, and will occur for many decades (to centuries, for the oldest trees) due to the time it takes for mature vegetation to return, if it can return at all after such destruction.

43 Finally, “mitigation” with an even-aged planted forest such as that existing near the Guy West Bridge at Sacramento State that the Corps points to as a restoration success is insufficient mitigation for the removal of a mature riparian forest featuring many heritage trees hundreds of years old, a key visual resource in an urban area. The description of the mitigation is insufficient to determine whether the mitigation will in any way be adequate to offset the significant impacts of the Project on such a treasured resource. Information presented by the Corps in other fora

⁷⁰ SEIS/SEIR at 4-140

⁷¹ “Project designs will be refined to reduce impacts on vegetation and wildlife to the extent practicable. Refinements implemented to reduce the loss of riparian habitat will include reducing the impact footprint, constructing bank protection rather than launchable rock trench whenever feasible, and designing planting benches. Where practicable, trees will be retained in locations where the bank protection and planting benches is constructed. Trees will be protected in place along the natural channel during rock placement. Additional plantings will be installed on the newly constructed benches to provide habitat for fish and avian species. The planting benches will be used where practicable to minimize impacts on fish and wildlife species. Where practical, soil filled revetment would be used to allow plantings and erosion protection features like launchable trench would be buried to allow plantings. The on-site habitat will be created in accordance with the ARCF GRR Habitat Mitigation, Monitoring, and Adaptive Management Plan, which includes conceptual mitigation proposals, performance standards, and adaptive management tasks.” SEIS/SEIR, Appendix B, at 4.1-33-34.

indicate that an even-aged forest will replace the diverse forest that currently exists, and yet that too is nowhere discussed or acknowledged.

4. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project's Significant Adverse Air Quality and Health Impacts

44

The Project will bring heavy-duty truck trips and diesel construction equipment into a residential neighborhood and near an elementary school, raising substantial health risks. The SEIS/SEIR acknowledges that “[c]onstruction haul traffic would occur on surface roads around the schools,”⁷² with an average of 138 heavy equipment truck trips *per workday* in the 3B/4B contract area and a total of 24,750 total trips.⁷³ The SEIR/SEIS nonetheless asserts that air pollution impacts under Impact 3.5-c would be “short-term and major effects that are less than significant with mitigation incorporated.” This assessment that the impact would be insignificant is incorrect.

The SEIS/SEIR appears to reach this conclusion by misunderstanding the Thresholds of Significance Table in the Sacramento Municipal Air Quality Management District (SMAQMD) Guide to Air Quality Assessment in Sacramento County (CEQA Guide). The SEIS/SEIR states: “As shown in Table 3.5-11 construction-generated exhaust emissions of PM_{2.5}, which includes DPM, would not exceed SMAQMD’s mass daily threshold of 82 lbs/day.”

First, in what way does Table 3.5-11 show that the project has remained under the daily threshold of 82 lbs/day? There is no basis for separating out exhaust-related PM_{2.5} and considering that the limit applies solely to that.

Table 3.5-11. PM_{2.5} Emissions by Construction Year

Construction Year	Unmitigated total PM _{2.5} generated – exhaust and dust (lbs/day)	Unmitigated PM _{2.5} – exhaust only (lbs/day)	Mitigated total PM _{2.5} generated – exhaust and dust (lbs/day)	Mitigated PM _{2.5} – exhaust only (lbs/day)
2024	71.62	20.62	104.58	9.95
2025	233.6	17.13	210.10	9.11
2026	169.49	11.98	159.76	7.35
2027	10.17	5.86	7.20	3.07

Notes: The HarborCraft calculator used to calculate barge emissions does not break out PM_{2.5} by dust and exhaust emissions, therefore, the barge exhaust emissions are not captured in the “exhaust only” columns.

For the Lower American River Contract 3A, exhaust only emissions are unknown, therefore, the total PM emissions are used.

45

Even more seriously, the SEIS/SEIR appears to have misunderstood the 82 lbs/day threshold. This standard would be the appropriate standard to consider for Impact 3.5-a,b related to consistency with regional plans. SMAQMD explains that it set that standard because the region exceeds the state particulate matter (PM₁₀ and PM_{2.5}) ambient air quality standards. This standard relates to the extent to which an individual project might “contribute to the cumulative non-attainment problem.”⁷⁴ However, the CEQA Guide makes it clear that the thresholds are not the full picture. It advises that “other factors, especially those related to the location of the

⁷² SEIS/SEIR, Appendix B, at 3.8-5

⁷³ SEIS/SEIR, Appendix B, at 2.1-4

⁷⁴ CEQA Guide, 2-8

project and potential impacts on nearby populations (e.g., schools, day care centers, residences, and hospitals) also should be examined.”⁷⁵

46 The CEQA Guide also notes that significance thresholds for Toxic Air Contaminants are a separate category, to which it dedicates a separate chapter. It explains that it has not established thresholds of significance for TACs from *mobile* sources, which is the category that would include trucks and construction equipment. Instead, it advises “that lead agencies address this issue on a case-by-case basis, taking into consideration the specific construction-related characteristics of each project and its proximity to off-site receptors,” listing at least seven factors that should be disclosed and considered.

Although PM_{2.5} does contain diesel particulate matter (PM) as stated in the SEIS/SEIR, diesel particulate matter is also a toxic air contaminant (TAC).⁷⁶ In other words, while it is harmful to breathe dust generally, it’s particularly bad and deserving of separate thresholds when that dust contains toxins. Diesel particulate matter is a particularly dangerous form of particulate matter, as the SMAQMD’s CEQA Guide explains, “particulate matter in diesel exhaust (diesel PM) dominates other air toxics in California’s air, and the estimated risk from breathing it is greater than the risk from all other airborne [Toxic Air Contaminants] TACs combined.”⁷⁷ SMAQMD also discusses naturally occurring asbestos (NOA) as a TAC. This is not addressed in the SEIS/SEIR despite the possibility that the rock to be imported would contain asbestos.

47 The SEIS/SEIR acknowledges that “there are four public schools within ½-mile of the American River Erosion Contract 3B North and South, and American River Erosion Contract 4B: Rio Americano High School, Sierra Oaks K-8 School, Isador Cohen Elementary School, and O.W. Erlewine Elementary School.” However, no mention is made that O.W. Erlewine is a title 1 school⁷⁸ meaning that noise, dust, engine exhaust, and other pollutants will impact children that are already disadvantaged. Moreover, O.W. Erlewine is adjacent to Larchmont Park which will become a staging area, which causes parents in the area great concern due to the health impacts it will cause. Likewise, the many children that play at Larchmont Park will be harmed as well. Because the Project documents fail to specifically address the Project’s harm to children, they violate CEQA.

48 While the SEIS/SEIR does discuss various air-pollution related mitigation measures, the documents fail to provide any detail as to protecting against long- and short-term health consequences for children, especially young children and those with pre-existing conditions such as asthma. The share of people in Project 3B’s census tract who have been told they have asthma is in the 65th percentile, according to the CJEST. This lack of detail renders the SEIS/SEIR flawed, as the public and decisionmakers cannot duly assess the Project impacts.

⁷⁵ CEQA Guide, 2-7

⁷⁶ 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 (and between third trimester and 2 years old, they are 10 times more sensitive).

⁷⁷ CEQA Guide, 5-2

⁷⁸ See Exhibit E

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Furthermore, Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. Trucks are already required to be 2010 or newer. These mitigation measures should be modified to require the trucks to be electric, as that is feasible.

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As another example of failed analysis and mitigation, the SEIR/SEIS states that “health risks associated with exposure to diesel exhaust typically is associated with chronic exposure, in which a 30 or 70-year exposure period is often assumed. However, while cancer can result from exposure periods of less than 30 or 70 years, exposure periods of 2 to 3 years are not anticipated to result in increased health risk, as health risks associated with exposure to diesel exhaust are typically seen in exposure periods that are chronic (OEHHA 2015).” This analysis fails to consider other commonly-cited health impacts of diesel particulate matter, including asthma and cardiovascular disease. It also fails to note that children are more sensitive because their respiratory systems are still developing. Nowhere is information provided as to why children should be expected to endure these impacts. OEHHA’s risk guidance recommends assessing cancer risks for construction projects lasting longer than two months. A construction health risk assessment (HRA) for the Project should therefore have been prepared, but has not been provided.

5. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project’s Significant Adverse Environmental Justice Impacts

51

The SEIS/SEIR fails to adequately disclose, analyze, and mitigate the Project’s effects on disadvantaged communities, i.e., the environmental justice ramifications of the Project. The SEIS/SEIR notes that “American River Erosion Contract 3B North and South, and American River Erosion Contract 4B is not located within a disadvantaged community. However, segments of the associated haul routes traverse and border disadvantaged communities.”⁷⁹ While technically the work area for the Project may not be within a disadvantaged community, as defined, the SEIS/SEIR fails to mention, let alone discuss, the use of the river by members of nearby disadvantaged communities for recreation and fishing. The river is a rare instance of a free recreational resource for the entire region, which is especially meaningful to underserved, disadvantaged, and economically-challenged members of the Sacramento region. Anecdotally, it is heavily used by these members of our community, though there is regrettably no data in the SEIS/SEIR that explores these uses. It is likely that the Project will significantly impact these communities by reducing opportunities for fishing and land- and water-based recreation, as well as avoiding the summer heat, and may well cause other significant environmental justice impacts, yet the SEIS/SEIR does not analyze these critical uses, resources, and effects.

6. The SEIR Fails to Adequately Disclose, Analyze, and Mitigate the Project’s Significant Adverse Climate Impacts

52

The Project documents do not analyze the impacts of the loss of riparian forest, especially the larger trees, on climate change. The forest in the Project area acts to sequester and store carbon, and the loss of that sequestration and storage of carbon must therefore be addressed in order to adequately analyze the Project’s climate impacts. This is especially so with regard to the

⁷⁹ SEIS/SEIR at Appendix B, 2.5-22

cumulative effects of the loss of this Project's riparian forest in addition to the loss of trees to the west.

53 As discussed in Moomaw et al. 2019: "Proforestation serves the greatest public good by maximizing co-benefits such as nature-based biological carbon sequestration and unparalleled ecosystem services such as biodiversity enhancement, water and air quality, flood and erosion control, public health benefits, low impact recreation, and scenic beauty."⁸⁰ Similarly, as stated in Law et al. 2020: "To keep climate and temperatures within a safe range, it is necessary to simultaneously reduce emissions of greenhouse gases from all sources, including fossil fuels and bioenergy, and accelerate storage of atmospheric carbon in forests, soils and other plant-based systems."⁸¹ Here, the Project documents speak to the GHG impacts from construction but ignore the impacts from loss of the forest's carbon sequestration.⁸² This must occur, and is yet another reason the lead agencies need to disclose which trees, especially large trees, will be lost due to the Project.

7. The SEIR Fails to Consider Reasonable Alternatives

54 CEQA mandates that agencies consider a range of alternatives, yet here, the only choice considered for the 3B/4B area was the Project or no action. This is particularly troubling given that the 2023 SEIS/SEIR introduces elements to the Project that are worse than in 2016 and yet provides no information or analysis as to why no other alternatives are feasible. There is no discussion of what site-specific data the Project is relying on, no discussion of why nature-based solutions are infeasible, no discussion of recent policies or studies regarding nature-based solutions, no discussion of why new or better modelling was not done, no discussion of the recent 2021 and 2023 American River studies regarding trees and velocity. The Project instead seeks to introduce an outdated rip-rap solution without any real consideration or analysis of the many alternatives that exist. This is inadequate under CEQA but is especially wrong in light of the Project area being a Wild and Scenic River where rip-rap is not allowed and where only actions that protect and enhance the River's values can occur.

55 As discussed above in the Wild and Scenic Rivers sections, new policies and new information, as well as the Wild and Scenic River Acts, require that alternatives be addressed and adopted to avoid harm to the recreational and fishery values of the River. The SEIS/SEIR, however, contains no such alternatives. Moreover, the analysis from 2016 is now eight years old, and documents that post-date it do not support the destructive measures chosen in the 2023 SEIS/SEIR. This shortcoming is especially problematic given that in 2016 the lead agencies committed to examining measures that would be less destructive and yet instead chose more destructive ones.

⁸⁰ Moomaw WR, Masino SA and Faison EK. 2019. Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good. *Front. For. Glob. Change* 2:27. doi: 10.3389/ffgc.2019.00027

⁸¹ Law et al. 2020.

⁸² *Ctr. for Biological Diversity v. United States Forest Serv.*, No. CV 22-114-M-DWM, 2023 U.S. Dist. LEXIS 144726, at *26 (D. Mont. Aug. 17, 2023) ("merely discussing carbon impacts and concluding that they will be minor does not equate to a hard look")

56 Nature-based approaches are now widely accepted and available, and new studies show that trees significantly reduce velocity flow along banks, while increasing velocities in the center. The 2023 study explains that “in addition to the results obtained previously by Flora and Khosronejad (2021) showing that vegetation will redistribute the flow away from the banks and into the main flow of the channel, the importance of incorporating vegetation into the LES was shown in this new study by highlighting its influence on the water surface profile.”⁸³

It is the lead agencies’ obligation to present a detailed and well-supported discussion as to why no alternative is feasible, and nothing like that is present in the SEIS/SEIR. Here, nature-based alternatives can allow greater protection of resources and new information shows that keeping trees, rather than eliminating them can be helpful for achieving Project goals.⁸⁴ Alternatives must be explored and adopted to avoid violations of CEQA and the Wild and Scenic River Acts.

8. The SEIR is Too Vague

57 Throughout the above, a core issue is the lack of information regarding what exactly will happen in the Project area. For example, the Project documents simultaneously speak to destruction of riparian habitat while also claiming to be eliminating few large trees. And while the Project documents contain no specific numbers regarding tree loss (especially with respect to large tree loss), the December 2023 presentation document suggests that over 600 trees will be lost, but yet again, even this document provides no specifics regarding large tree loss or where exactly that loss will occur.

58 CEQA requires that an EIR include “relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public,”⁸⁵ so as to “make a decision which intelligently takes account of environmental consequences.”⁸⁶ Here, the lack of information regarding impacts to the riparian forest, especially large trees, renders the SEIS/SEIR too vague to be valid.

E. The SEIS Violates NEPA

59 Congress enacted NEPA to “promote efforts which will prevent or eliminate damage to the environment and biosphere and ... to enrich the understanding of the ecological systems and natural resources important to the Nation.”⁸⁷ To this end, NEPA and its implementing regulations set forth “action-forcing” procedures designed to (1) ensure agencies take a “hard look” at the environmental effects of an action, and (2) foster meaningful public participation.⁸⁸ Through NEPA, the agency must take a “hard look” at the project’s “site-specific” impacts, and must describe alternatives to the proposed project. A “hard look” requires consideration of all

⁸³ 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>.

⁸⁴ 14 C.C.R. § 15162

⁸⁵ 14 C.C.R. § 15147

⁸⁶ 14 C.C.R. § 15151

⁸⁷ 42 U.S.C. § 4321

⁸⁸ See *Robertson v. Methow Valley Citizens Council*, 490 U.S. 332, 349–50 (1989)

foreseeable direct, indirect, and cumulative impacts, and “should involve a discussion of adverse impacts that does not improperly minimize negative side effects.”⁸⁹

Here, for the reasons discussed above with respect to CEQA, the Corps failed to meet NEPA’s standards as well. There was not a hard-look at the Project’s impacts, and no alternatives were considered despite the fact that the alternatives analysis is the “heart” of NEPA. It is imperative that the Project not move forward and instead be re-designed to avoid its significant harmful impacts.

F. The 2023 SEIS/SEIR Fails To Uphold The Promises Made In The 2016 Responses to Comments

60

In 2016, numerous members of the community and community groups wrote the Corps with regard to the 2016 ARCF GRR EIS/EIR.⁹⁰ The signatories to this comment letter and members of the organizations that signed the 2016 comment letter are disappointed that many of the issues raised in the 2016 letter are being raised again eight years later, in 2024. Some of the issues raised in the 2016 letter that we are perplexed for the need to raise yet again include:

1. That “our overarching concern is that there is not enough detail in the Final EIS/EIR to understand which Lower American River and Parkway resources will be affected by the project.”
2. “We also strongly question [] whether the Final EIS/EIR accurately characterizes the impacts to vegetation and recreation as ‘less than significant.’”
3. “We are concerned that the project provides the community with no alternatives [to the work].”
4. “The Final EIS/EIR is ... unable to point out with any detail which sections of forest will be removed, and which will be allowed to remain standing. Nonetheless, the Final EIS/EIR determines that the impacts to vegetation in the parkway will be “less than significant” after mitigation. We question this determination in light of this lack of detail.”
5. “It is not possible to evaluate the effectiveness of th[e] mitigation without knowing what sections of forest will be cut and what sections will be replaced on the same site versus being replaced on a distant site.”
6. “The Final EIS/EIR does not adequately characterize the many varied uses of the river and the 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 the parkway’ paved bikeway. While a key asset, there are others equally worthy of close consideration, such as swimming, shoreline recreation, fishing, walking, and bird-watching. The Final EIS/EIR pays inadequate attention to the value our community puts on the river for all of these activities.”
7. “The final EIS/EIR does not seem to survey the recreational uses the river’s banks are put to, and hence, it seems to inadequately judge the significance of the project and fails to set forth alternatives to it.” “These recreational resources should be cataloged in detail[.]”

⁸⁹ *Idaho Sporting Cong. v. Rittenhouse*, 305 F.3d 957, 963 (9th Cir. 2002)

⁹⁰ See, e.g., 2016 FEIS/FEIR, Appendix F, at PDF pp. 45-52

8. “The Final EIS/EIR gives the community only the barest of information to understand which treatments are proposed to occur along particular stretches of the river. This level of detail is insufficient.”

61

Because each of these comments can be re-cast to apply to the current SEIS/SEIR, we repeat the comments in this letter. Finally, in other comment responses in 2016, the lead agencies promised to work around the preexisting vegetation and “minimize impacts to vegetation in the Parkway to the maximum extent possible during construction.”⁹¹ An examination of the work done in the previous phase of the project, between Howe Avenue and Paradise Beach, shows few trees that were saved and “worked around.” Downriver of the Fair Oaks bridge, it appears that not a single tree within the construction footprint was preserved; 100% of the trees were removed. As noted above, the community is greatly concerned by the lack of detail in the description of the Project (3B/4B) and fears that despite the assurances in responses to formal comments, the area in the Project under consideration will be designed and constructed in a similar matter, leaving few if any trees within the Project footprint. Given what happened in the vicinity of Paradise Beach, the public does not trust that the habitat and other values in this important stretch of this Wild and Scenic River will be protected.

Sincerely,

Justin Augustine, Center for Biological Diversity
Jaime Becker
Matt Carr
Clint Duke
Julie Gabele
Nancy Kniskern
Peter Spaulding
Betsy Weiland

cc:

Liz Bellas, Director, Sacramento County Regional Parks, BellasE@saccounty.net;
sorgenkc@saccounty.gov;
Susan Rosebrough, National Parks Service, Susan_Rosebrough@nps.gov

⁹¹ See, e.g., 2016 FEIS/FEIR, Appendix F, at Comment/Response EE-173



CALIFORNIA NATIVE PLANT SOCIETY

Sacramento Valley Chapter

January 10, 2024

Mr. Guy Romine
Attn: Environmental Analysis Section (CESPK-PDR-A)
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814

Mr. Josh Brown
Central Valley Flood Protection Board/California Department of Water Resources
3310 El Camino Avenue, Suite 170
Sacramento, CA 95281

Subject: Public Comment Period for the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report for the 2016 American River Common Features, Flood Risk Management Project

Dear Mr. Romine and Mr. Brown,

Currently the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) has a public comment period beginning on December 22, 2023 and closing on February 5, 2024.

The Sacramento Valley Chapter of the California Native Plant Society will be commenting on this project. Our initial review of the environmental documents has revealed the significant complexity and scope of the proposed changes to the original project, and has made it clear that additional time will be needed to adequately review and comment on this document.

This document has taken U.S. Army Corps of Engineers and the Central Valley Flood Protection Board nearly a year to prepare. The public and Responsible Agencies (including the Sacramento County Regional Parks Department) and Trustee Agencies should be granted a sufficient review period to understand the significant environmental effects of this proposed project.

Additional time is needed to review the environmental documents based on the significant complexity and length of the environmental documents. In addition, the environmental document (SEIS/SEIR Section 2.3) identifies numerous significant areas of controversy with respect to the proposed project.

- o Habitat mitigation in the American River Parkway as proposed for the American River Mitigation Site (aka Urrutia Property);
- o Construction-related impacts to biological resources, especially endangered species and their habitats;



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California Native Plant Society - CNPS is a not-for-profit organization.
www.CNPS.org



CALIFORNIA NATIVE PLANT SOCIETY

Sacramento Valley Chapter

- o Extensive removal of vegetation and tree removal, especially the extent of heritage tree removal;
- o Effects to cultural resources and resources significant to Indigenous People; and
- o Effects to recreational areas and facilities.

1 The type, number and significance of these controversial issues clearly support the need for an extension of the public review period to allow adequate review and comment.

We respectfully request a 45-day extension of the public review period to allow the public and pertinent agencies adequate review time for the environmental documents.

Sincerely,

Dan Meier

Dan Meier
American River Parkway Representative
Sacramento Valley Chapter
California Native Plant Society

cc:

Liz Bellas, Sacramento County Regional Parks



Protecting California's native flora since 1965
California Native Plant Society - CNPS is a not-for-profit organization.
www.CNPS.org



Central Valley Bird Club

314 22nd St, Sacramento, Ca 95816

U.S. Army Corps of Engineers
Public Affairs Office
Attn: ARCF SEIS
1325 J Street, Room 1513
Sacramento, CA 95814-2922
ARCF_SEIS@usace.army.mil

State of California
Valley Flood Protection Board
Attn: ARCF SEIS/SEIR
PublicCommentARCF16@water.ca.gov

Subject: Comments on the Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report

1 The Bird Club represents 460 members who are birders, conservationists, natural resource managers, and researchers from the Central Valley and elsewhere in California. Many of our members are from the Sacramento region and birdwatch extensively along the American River. Our data, as incorporated into eBird, but underutilized in the SEIS/SEIR, could have contributed as a basis for recognizing and managing bird and habitat conservation values and priorities for this region.

2 We are deeply concerned about the habitat and bird population impacts of recently completed flood control work along the American River and what is proposed in these project contracts. We are also gravely concerned about the inadequate public involvement process employed by the project applicants and the many deficiencies in the environmental analysis incorporated into the project Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR)

The comments we provide here are incomplete, as a result of the inadequate process offered for public involvement and the deficient presentation of material in the SEIS/SEIR. The timing of the document's release, short duration provided for public comment (including a short, late-announced extension), and the difficult-to-navigate from of the SEIS/SEIR has significantly hampered us in commenting meaningfully. Therefore, we ask that the proponents take the following procedural actions:

- 3
- Further extend the public comment period by at least 30 days beyond the extension granted, to allow the public time to understand and comment meaningfully on a project of such substantial magnitude;
 - Add additional public meetings, including in-person and on-the-ground meetings where experts can engage in dialog with the public regarding the project need and the potential to apply alternative proposed flood control designs to those identified in the document;
- 4
- Re-release the existing version of Appendix B with a Table for Contents that can be used in navigating the document; and
 - Considering the many deficiencies in the environmental process and documents, fully consider our comments, and those of other concerned groups, and reissue a substantially revised supplemental draft EIR/EIS so that we can meaningfully comment on the project and on an environmental document that adequately addresses public concerns, adequately considers a full range of alternatives, fully discloses environmental impacts, and meets legal requirements.

We have mostly focused our attention on the analysis of impacts to birds, their habitats, and to a lesser degree wildlife-related recreation. We endorse the concerns expressed by other entities regarding the environmental process, conflicts with adopted plans, legal compliance, and impacts on other resource values, including other wildlife (especially the western pond turtle), vegetation communities, rare plants, general dispersed recreation, and visual quality impacts.

5

As emphasized in our comments, we are concerned that the conversion of Urrutia Pond would result in a significant impact to a variety of waterbirds that currently use the pond for feeding and especially for night-roosting. Despite these issues being clearly communicated during the scoping process, the SEIS/SEIR does not acknowledge the impacts, nor their significance, that would result to this habitat and its constituent species from the conversion of this site to a seasonally flooded riparian area. Avoidance or mitigation for this significant impact is required.

6

While we support protection of the citizens of Sacramento from flood risks, the project proponents have not demonstrated that they have proposed a project that achieves this objective while also avoiding, minimizing, or successfully mitigating substantial impacts to environmental resource values and resource-based recreation. We believe that more careful environmental designs, including some that have been installed in the past and that appear to be operating successfully, are feasible to apply in this project.

7

In short, we encourage the project proponents to engage meaningfully with the public and natural resource management agencies to find flood control solutions that maximally protect natural resources and public uses.

We thank you for your consideration of our comments. Please keep us informed regarding project status.

Patricia Bacchetti *Daniel Airola*

Patricia Bacchetti
President

Daniel Airola
Certified Wildlife Biologist
Conservation Chair

General Comments	
8	Complexity and Overly Technical Presentation. The SEIS/SEIR is full of detail and jargon that appears to be intended to obscure what the project(s) consists of and what its impacts will be. This complexity requires an extensive public outreach effort to allow the public to understand what is likely to happen and time for public review and response. The structure of the document appears to be designed to discourage rather than encourage public review.
9	Inadequate Public Involvement. The responsible agencies' public involvement and outreach process is minimal and inadequate for a project with impacts of this magnitude. The timing of release of the document (3 days before Christmas) and the short review period afforded are convincing evidence of an intent by the proponents to actively hamper the public's ability to meaningfully comment on project, its impacts, and the findings. A substantial extension to the public comment period should be granted to meet the spirit and specific requirements of NEPA and CEQA.
10	The Document is Extremely Difficult to Navigate. The document is nearly impossible to navigate. It refers to Appendix B as the location of the detailed Biological Resources Analysis, but there are two Appendix Bs, one that is an impact analysis and another that is the Public Meeting Scoping Notice. Such confusion makes thorough public review extremely difficult. The lack of an indexed Table of Contents for Appendix B, which details the environmental analysis, makes it virtually impossible to navigate it to conduct a review. I have literally spent hours over several weeks just trying to find sections dealing with biological resources and am often unsuccessful. Thus, my comments are incomplete. The proponents need to reissue a document with an indexed Table of Contents so the public can conduct a meaningful review.
11	Incomplete and Inadequate Environmental Analysis. In many areas, many of which we have outlined in our specific comments below, potential impacts are not recognized or analyzed. The analysis of the ARMS is particularly deficient. The SEIS/SEIR acknowledges the inadequacy of its analysis in the note included with Tables (4.3-2 and 4.3-3) on p. 872 and 873: " <i>Current programmatic level designs for ARMS and SRMS cannot provide quantitative data for species impacts. Detailed impacts to habitat will be disclosed in the Final SEIS/SEIR.</i> " Deferring impact analysis to the Final SEIS/SEIR does not allow the public to comment on the results of the analyses, the findings of significance, or the adequacy of any proposed mitigation measures and is contrary to the requirements of NEPA and CEQA. This acknowledges inadequate treatment of potential impacts necessitates a recirculation of the Draft SEIS/SEIR with the appropriate analyses and conclusions for public review and comment.
12	Inadequate Consideration of Alternatives to Urrutia Pond Site as Mitigation. The SEIS/SEIR does not include alternatives to the Urrutia Pond for mitigation. There clearly are alternatives to the use of this site, as SAFCA had GEI prepare a report identifying multiple potential mitigation sites in the report "American River Common Feathers Mitigation Site Concept and Evaluation Report (GEI 2020). Given that multiple alternative locations were identified for use in mitigating project impacts, the project proponents should have included an analysis of mitigation alternatives in the SEIS/SEIR. The absence of alternatives prevents the public from determining if the selected alternative is the least environmentally damaging alternative that could have been selected. The lack of alternatives is thus a key deficiency that requires new analysis in a reissued SEIS/SEIR so that the public can evaluate and comment on the analysis of impacts at alternative sites.

13

Characterization of the Impacts of the Use of Urrutia Pond for Mitigation Use is Inadequate. We highlight this component of the project because of its likely significant impacts on many waterbirds that use the Lower American River. These impacts were not recognized and (in places) incorrectly characterized in the SEIS/SEIR, despite the demonstrated fact that they were identified during project scoping (see D. Airola and C. Conard comments in Appendix D). The proposed project would eliminate one of the few open-water habitat areas along the river as mitigation for riparian birds and anadromous fish. Recent peer-reviewed published research has documented the extensive use of this pond by a large number and high diversity of waterbirds. Of particular concern, the pond serves as night roosting habitat for a high proportion of the population of diving duck (Common Goldeneye, Bufflehead, and Common Goldeneye) that use the Lower American River. Loss of this key open-water habitat would disrupt the daily movement of birds from roosting to foraging habitats, which is a significant impact under CEQA. The loss of open-water habitat could result in substantial declines in the populations of these night roosting species, as well as birds that make substantial use of the site during daylight hours. The SEIS/SEIR also does not recognize that potential value of the pond as a hunting area for the nesting pair of Bald Eagles onsite, and the potential for open-water habitat loss to cause abandonment of the nest site.

14

Incorporation of a Permanent Pond into the Urrutia Mitigation Plan. The SEIS/SEIR should address whether it is feasible to incorporate a deep permanent pond into the mitigation design. Could the existing pond serve as a rearing area for salmonids with enhancement of shoreline cover for high water periods? This would allow retention of an open water area for use by diving ducks, cormorants, and other waterbirds that depend on open water conditions.

15

Inconsistency with the County's Natural Resource Management Plan Regarding Treatment of Urrutia Pond. Retention of Urrutia Pond, as shown in the Parkway Plan (County of Sacramento 2008), was based in part on a robust planning process known as the American River Parkway Plan Integrated Area Plan Concept for the Reaches of Discovery Park, Woodlake, and Cal Expo (February 2006). This plan was prepared under the direction of the Joint Agency Project Management Team (PMT) and the American River Parkway Plan Update Citizens Advisory Committee (UCAC). This plan supported retention of the Urrutia Pond as a central feature for purposes of nature study, recreation, and cultural interpretation, and contained specific recommendations to improve human safety and to increase biodiversity of the pond and the surrounding land. The proposed mitigation use is clearly in conflict with this plan.

16

Lack of Bank Protection/Erosion Control Alternatives. The designs of the proposed erosion control measures, and thus the impacts of their application, are unclear. Designs of existing older protection on the north bank between Watt and Howe and downstream of Paradise beach on the south bank appear to be functioning adequately and provide considerable habitat value. Are these same designs going to be used in sections without protection in Contracts 3B North and South and 4B? Or will the design look like those applied last year between the H St. Bridge and Paradise Beach, and longer ago above Discovery Park, which appear to have considerably less value and are unlikely to develop as much value in the long-term. Is the existing protection going to be torn out and replaced with the new design?

The design of the previously installed erosion control features in the project area appears to have substantially less environmental impact than the proposed design (if it is the same as used at H St). If the existing design provides adequate protection, why is it not being used in Contracts 3B North and South and 4B? Why isn't the previous design being evaluated as an alternative in the SEIR/SEIS? Under CEQA, the lead agency is required to adopt the least environmentally damaging alternative that meets project objectives. It cannot use economic efficiency to justify selection of a less damaging design if the cost is feasible to incur. If the existing design meets flood control objectives, it must be analyzed in the Draft SEIS/SEIR and adopted. Because it is not there (or at least not clearly depicted), it

appears that it must be added to the analysis and a subsequent Draft SEIS/SEIR and reissued for public review.

Inadequacy of the Mitigation Plan to Replace Lost Habitats. Based on the designs depicted in the SEIS/SEIR, we are concerned as to whether lost valley oak habitat will be adequately replaced. It appears that the frequency of inundation by winter floodwaters will be greater than oaks can tolerate. We ask that a better depiction of flooding frequencies and elevations be presented and analyzed and the designs be modified if our concerns are valid.

Destruction of the Double-crested Cormorant Roost is Not Recognized or Mitigated – A cormorant roost was first recognized in 2019 along the north bank of the American River several hundred yards upstream of the Oak Meadows Park access within Project Area 3B North Side (eBird.org). Many cormorants and several Great Egrets roost nightly in dead and dying black locust trees that lean out over the river (i.e., shaded aquatic habitat) from September through March. The overhanging character of the vegetation appears to be important by creating safe, accessible roosting sites. As documented in eBird, numbers of roosting birds have been increasing annually from an average of 23 birds in 2019-2020 to an average of 69 birds in 2023-2024, and a high count of 105 birds in November 2022. Based on observations of flight paths of birds at dusk toward the roost, it is likely that this roost serves most of the cormorants that use the middle section of the Lower American River during the daytime.

Removal of the cormorant roost trees would disrupt a movement corridor used by the cormorants, and thus is a significant impact under CEQA. The needs of roosting cormorants may be met by the mitigation habitat created at the Urrutia Pond, but not until after a period of 3-5 decades, so this would not reduce impacts to a less-than-significant level. Efforts should be made to avoid treating this section of the river or preserve these trees (and their overhang of the water) during bank protection work. Other roosting sites should be explored along the American River, and opportunities to create additional roosting habitat (i.e., installation of poles with roosting arms) should be explored as mitigation for temporal or permanent loss of this important habitat.

Lack of Recognition of Impacts and Proposed Mitigation to Vertical-Bank-Nesting Species. The project would eliminate known occupied habitat for species that require or prefer vertical banks for nesting, including the Belted Kingfisher and Northern Rough-winged Swallow. The comprehensive nature of bank elimination would result in significant losses to the populations of these species. Mitigation, although challenging, could involve bank retention, creation of banks as a part of mitigation habitats, and experimental creation of artificial burrows for the swallow.

Loss of Nesting Sites for Cavity-nesting Species is Not Acknowledged or Mitigated. The removal of numerous large trees will eliminate nesting habitat for primary and secondary cavity nesting bird species, including Wood Duck; Common Merganser; Western Screech Owl; Ash-throated Flycatcher; Nuttall's, Downy, and Acorn Woodpeckers; Northern Flicker; Tree Swallow; White-breasted Nuthatch; Oak Titmouse; Bewick's Wren; House Wren; and Western Bluebird, as well as raccoons, western gray squirrels, and other species. Mitigation areas will not become suitable for excavation of nest cavities for 20-40 years. Therefore, mitigation areas should include provision of nest boxes for cavity-nesting waterfowl and songbirds to provide nesting habitat to offset losses of forest removal. Nest boxes are a proven technique to attract and increase cavity-nesting bird populations, if they are properly designed, installed, managed, and monitored (Airola and Stine 2022).

Evaluate Use the American River Dr. Detention Basin for Riparian Mitigation. The 12-ac detention basin between Watt and Estates Dr. currently provides minimal habitat value, but could be enhanced through deepening, creating more varied topography, and using urban runoff or pumping to maintain wet conditions. This habitat could replace some of the riparian mitigation habitat lost by protecting a

portion of the Urrutia Pond. Alternatively, this area could be converted to an open-water aquatic habitat to provide resting habitat for displaced night-roosting diving duck, although its size and configuration makes it less suitable for this purpose. Because the existing habitat value of this site is lower than that of Urrutia Pond, it should be considered as part of the least-damaging practicable alternative. We suspect that there are other opportunities such as this, that could be used for riparian mitigation without destroying key habitat for other species.

Specific Comments

Page	Section	Comment
3-70	3.5.5	<p>The proposed modifications at the American River Mitigation Site (ARMS) are intended to address mitigation needs for impacts occurring outside of the American River Parkway. Use of Parkway lands for outside mitigation violates the County's American River Parkway Plan.</p> <p>The impacts associated with river construction are only temporary, while the loss of open water pond habitat is permanent. Also, impacts of providing fill and recontouring land will produce air quality impacts similar to those of excavating elsewhere.</p>
3-72	3.5.5.1	<p>The deferral of studies that may affect "project level analysis and planning" demonstrates that the impacts of the project are not fully known. A supplemental draft SEIS/SEIR with studies that allow complete impact assessment and full public involvement is needed to ensure that impacts are properly analyzed and mitigated.</p> <p>The application of a blanket 600-ft construction buffer to the Bald Eagle nest is inappropriate, given the known variation of individual eagle pairs to disturbance (e.g., Airola 2007) and the rarity of nesting Bald Eagles (only one pair) on the Lower American River. Given the isolated nature of this site and low level of current human disturbance there, these birds may be more sensitive to human disturbance than is typical of the species. The buffer should be established on a site-specific basis prior to construction through observation of eagle responses to construction equipment operated experimentally at various distances from the nest.</p>
3-95	3.7.3	<p>Please explain why use of this site would result in a reduction in impacts to air quality, traffic, and noise as a result of a reduced need for fill. The characterization of benefits as a justification to select the Urrutia Pond area as a mitigation site, as described in 3.5.3, is misleading or incorrect. Filling the Urrutia site will require excavation elsewhere and transport of fill material, and so is no more beneficial than excavating a riparian mitigation site elsewhere in the Lower American River floodplain.</p> <p>Rejection of the proposed alternative to retain a portion of the Urrutia pond based on the need for the site for elderberry mitigation is inappropriate, as there are many alternative sites between Highway 160 and Paradise Beach that could be used to mitigate for the purported impact of elderberry removal on the valley elderberry long-horn beetle. Selecting one of these other available sites would not</p>

<div>28</div> <div>29</div> <div>30</div> <div>31</div> <div>32</div>	<div>3-95</div> <div>3-98</div>	<div>3.7.3</div> <div>3.7.2</div>	<p>result in significant impacts to waterbirds of the Lower American River. Similarly, if impacts to salmonids could be mitigated elsewhere, such as by excavating side channels in the floodplain that were raised by deposition of historic hydraulic mining deposition, so that impacts to waterbirds could be avoided or reduced, this must be evaluated in the Draft SEIS/SEIR. To suggest that only this site can mitigate for these impacts is undemonstrated and unsupportable, particularly in light of the study funded by the proponents that identifies a number of other potential alternative mitigation sites (GEI 2020).</p> <p>The description shows that the County's proposed option to retain a 30-ac pond would result in less need for fill, and thus less impact to air quality, noise, and transportation, as well as less impact to existing waterbird use of the site (Airola et al. 2023). CEQA requires that the lead agencies select the least damaging environmental alternative that meets project objectives unless there are overriding considerations. Those have not been identified.</p> <p>The depiction of alternative sites to meet mitigation needs in this SEIS/SEIR and in GEI's (2020) mitigation alternatives evaluation demonstrates that mitigation could be achieved without destroying the entire Urrutia Pond and causing the resulting impacts to CEQA. Again, the selection of the least damaging practicable alternative is required under CEQA</p> <p>The presence of the Bald Eagle nest was known by the County and the proponents well prior to the release of the SEIR/SEIS. We contend that a sizable pond area remnant can be designed to include the central portion of the existing pond, thereby extending the buffer around the nest, while allowing mitigation construction to occur on the east and west sides (via two separate entrances to the American River and possibly a connection around the north side of the remnant pond). While this design would increase the amount of construction and fill required (to separate the pond from mitigation areas) it would better protect the eagles from construction disturbance. More importantly, it would retain an open water pond area that is highly attractive to the eagles' avian prey and would retain suitable open water habitat in which eagles could hunt for fish and the remaining waterbirds. Absent any other evidence, it is reasonable to conclude that the presence of this open water foraging habitat was a key inducement for the eagle pair to locate there in 2022, and that elimination of the pond could result in abandonment of the nest territory.</p> <p>The first paragraph correctly describes the substantial environmental benefits of pond retention of the County's proposed alternative. Again, this narrative demonstrates that alternatives are available to meet project mitigation needs.</p> <p>The characterization of mitigation shortfalls described here needs further documentation and correct depiction of a feasible alternative. The deficiency for VELB mitigation would be only one acre. It seems</p>
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3-98	3.7.2	<p>illogical that retention of approximately one-third of the existing pond would reduce salmon mitigation by a roughly equal amount, while it would reduce cuckoo habitat to only one-third of what would have been produced under the proposed project (29 acres).</p> <p>Arden Pond has been demonstrated to have high value to waterbirds, similar to Urrutia Pond (Airola et al. 2023). The use of this site, and the impacts of previously proposed mitigation clearly were inadequately analyzed in previous environmental documents, especially in light of new information (Airola et al. 2023), which verifies concerns previously expressed during scoping regarding mitigation use of this site. An additional supplemental SEIS/SEIR would be required to fully address the waterbird impacts that were inadequately addressed previously. We oppose use of both the Urrutia Pond and Arden Pond for mitigation purposes but recognize that there are more options to retain some habitat value at the larger Urrutia Pond. Because Arden Pond is smaller, its use (such as under previous mitigation proposals) would leave a remnant too small to serve the key waterbird roosting needs that it currently serves (Airola et al. 2023).</p> <p>Due to impacts to wildlife and recreation, Arden Pond should not be considered for mitigation need. There is ample area of high terrace habitat, created artificially by hydraulic mining debris deposition, that currently has low habitat value. Excavation of channels and ponds in this area or elsewhere could provide the mitigation needs of the project while enhancing habitat for waterbird species, rather than degrading it.</p> <p>This characterization of effects ignores that the loss of waterbird habitat at Urrutia or Arden Ponds would be a significant impact under CEQA and thus would require its own mitigation (i.e., creating an open water body in some other location). Selecting a mitigation site with lower habitat value, such as near Cal Expo would avoid these impacts and mitigation need.</p> <p>The impacts to waterbirds resulting from selection of the Urrutia site were highly predictable based on similar concerns expressed regarding Arden Pond and scoping comments. The decision to proceed to select Urrutia Pond as a mitigation site, and the potential threats that this poses not just to wildlife but to the project schedule, is thus largely attributable to poor planning and unwillingness to incorporate public concerns. It is not too late to correct this error by fully analyzing the impacts of using the available alternative mitigation sites and shifting the mitigation program to another site with fewer impacts.</p>
3-99	Figure 3.7.2-1	This figure depicts only one potential configuration of the pond that would avoid construction near the eagles' nest. The linear nature of

34	3-99	Figure 3.7.2-1	this pond reduces its potential for use by night-roosting waterfowl, which is a key resource for the Lower American River (Airola et al. 2023). An alternate, more circular configuration (with a generally rounded shape, as shown in Figure 3.7.1-1) could be developed to the north of the Bald Eagle nest, which would avoid the need for construction access near the Bald Eagle nest and would retain as much waterbird use as possible.
35	3-107	3.10	The range of alternatives considered is wholly inadequate. All alternatives considered would result in significant impacts to waterbird populations that travel daily between the river and Urrutia Ponds for night roosting. Disrupting this movement corridor is a significant impact under CEQA. The alternatives analysis does not explain why the less damaging alternative of constructing mitigation habitats in the degraded floodplain area near Cal Expo or other identified mitigation sites along the Lower American River (GEI 2020), entirely or in part, were not considered, much less selected. Some of these alternatives are highly likely to be environmentally superior. Absent any documentation, it appears that the alternative were not considered because they may have been considered more expensive to construct. Under CEQS, expense is not an adequate basis for ignoring an environmentally superior alternative unless it is determined to be physically or economically infeasible.
36	4-115	Table 4.2.2-1	Impact Number 2.2-c. The characterization of impacts is illogical and incorrect. Birdwatching, hiking, and nature appreciation are major uses of Contract 3B and 4A and 4B that serve a large population of adjacent residents and others from throughout the region. As noted, the proposed project will cause substantial long-term disruption in the use. Specifically, this impact will last for years after completion of project construction due to permanent habitat loss, wildlife population loss, and creation of areas with lower visual quality and reduced solitude character. None of the proposed mitigation measures reduces these impacts to less-than-significant. The impacts can be reduced, although not to a less-than-significant level by adopting modified designs that retain existing large trees and other vegetation wherever feasible and allowing riparian vegetation to grow on affected reaches.
37	4-115	Table 4.2.2.2	Impact 2.2a, 2.2-b, 2.2-c Erosion Contracts. The definition of short-term and medium-term are not clearly stated, so we cannot properly evaluate claims of impact magnitude or significance.
38			The characterization of short- to-medium-term impacts as moderate to major and less-than-significant is illogical and incorrect.
			The characterization that erosion control projects will have “no impacts with mitigation incorporated” is utterly incorrect, given the loss of many 50- to 200-year-old trees and the intent to manage erosion control areas to preclude establishment of woody vegetation. These impacts are clearly significant, regardless of what offsite

<p>39</p> <p>40</p>	<p>4-115</p> <p>Table 4.2.2.2</p>	<p>mitigation is implemented. Therefore, the effects should be minimized by implementing feasible designs that retain as many existing trees and as much other natural vegetation as possible and by allowing establishment of woody vegetation on protected areas.</p> <p>The omission of any discussion of long-term impacts renders the document incomplete, thereby contributing to the need for document revision and recirculation as a SEIS/SEIR.</p> <p>Impact 2.2-c. ARMS. The County’s American River Parkway Plan specifies intentions to acquire the Urrutia Pond in part to increase recreation opportunity. The foreclosure of this opportunity to acquire and incorporate an open water pond area is a conflict with the adopted plan and thus a significant impact under CEQA that must be mitigated. The best mitigation would be to retain a portion of the existing pond as described in the Alternative provided by the County or by one that places the pond area north of the eagle’s nest with mitigation connections to the river east and west of the nest.</p>
<p>41</p>	<p>4-119</p> <p>4.3.1.2.2</p>	<p>American River Mitigation Site. The statement that birds will simply be “scared away” is not supportable. Bird populations and use levels are largely determined by the amount of suitable habitat present in an area. Basic wildlife science supports the conclusion that at least some if not most of the birds that are displaced from construction areas will be displaced to habitats that are already supporting individuals at levels at or near their carrying capacity. Therefore, population reductions will likely result from the permanent removal of open water habitat by construction.</p> <p>The gradual increase in channel and riparian habitat will ultimately benefit those bird species that depend on these habitats. The change in habitat from a large open waterbody to narrow channels and seasonally flooded riparian habitat will not support many of the species that prefer using open water areas for foraging and resting, including wintering diving ducks, geese, gulls, and cormorants. Of special concern is the effects of loss of night-roosting habitat on the populations of diving ducks, including the Bufflehead, Common Goldeneye, and Common Merganser. A substantial proportion of the populations of these species along the Lower American River use the Urrutia Pond (and at Arden Pond) for night roosting (Airola et al. 2023). Loss or reduction of this habitat has a strong likelihood to reduce populations of these species as they are forced to seek out less suitable roosting habitat</p>
<p>42</p>	<p>4-184</p> <p>4.5.1.1</p>	<p>American River Mitigation Site. The high level of use of this site by waterbirds should be acknowledged.</p>
<p>43</p>	<p>4-186</p> <p>4.4.1.1.2</p>	<p>The Urrutia Pond should be recognized as a sensitive natural habitat because of its subsurface connection to the American River and Steelhead Creek, its surface connection during high-water events, rarity as a habitat type locally, and especially because of its regional</p>

	4-186	4.4.1.1.2	importance to waterbird populations along the Lower American River (Airola et al. 2023).
44	4-188	Table 4.4.1-2	<p>Impact 4.1a. The elimination of Urrutia Pond would interfere with the daily movements of numerous waterbirds from daily foraging areas on the river to the pond for night-roosting, including Bufflehead, Common Goldeneye, and Common Merganser. This permanent disruption is a significant impact, as defined under CEQA Appendix G. As such it must be mitigated to a less-than-significant level. The mitigation should include moving all mitigation to other sites (as identified by GEI (2020), implementing pond protection as defined in Alternative 4a or the alternative configuration we have proposed elsewhere in this comment letter, along with creation of additional ponded habitat to fully offset pond habitat losses.</p> <p>Impact 4.1b. The proposed action, by removing Urrutia Pond has potential to cause substantially reduced winter night roosting and daily foraging habitat for waterbirds that use the Lower American River. Therefore, this impact is significant and requires mitigation to a less-than-significant level.</p> <p>Impact 4.1-d. Because of its subsurface connection to navigable streams, and surface connection during high-flow events, the Urrutia Pond should qualify as a water of the U.S. and its loss as a significant impact that should be mitigated.</p> <p>Impact 4.1-e. Elimination of Urrutia Pond conflicts with the adopted American River Natural Resources Management Plan and thus is a significant impact.</p>
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47	4-194	4.2.1.2.2	American River Mitigation Site. The significant impact of the loss of pond habitat should be acknowledged here.
48	4-215		<p>Purple Martin. This account demonstrates a lack of basic knowledge of the preparers. Purple Martins has been extensively studied since the 1990s with over 30 articles and a book published (e.g., Airola and Grantham 2003, Airola and Williams 2008, Airola 2020, Airola and Kopp 2021, 2023). The Sacramento Purple Martin population is the last remnant of the species' once widespread population in the Central Valley, now nesting in only 5 elevated freeway and overpass sites in Sacramento (Airola 2020, Airola and Kopp 2021, 2023). The species has not been documented to have nested in trees in the Central Valley for at least 40 years. In this case the SEIS/SEIR has overstated the potential impacts of the project. There should be no effects of the project on Purple Martins and no mitigation should be required.</p>
49	4-216		<p>Other Breeding and Migratory Birds. Recent published research provides a more detailed understanding of the role of Urrutia and Arden Ponds as resting habitat for diving ducks, including not only the Canvasback but also the Bufflehead, Common Goldeneye, and Common Merganser, as well as their importance as foraging habitat to Wood Ducks, Mallards, Double-crested Cormorants, American Coots, and other waterbirds (Airola et al. 2023). This research demonstrates that high proportions of the populations of these species that use the</p>

4-216		<p>American River in winter also use the ponds either for night roosting or daytime foraging. The birds choose these open water areas presumably because they allow birds to forage, conserve energy, and avoid predation. Narrow flooded open water areas and flooded riparian habitat will not serve these needs for these species because they rely on open areas to detect predators. Thus, the proposed mitigation could reasonably be expected to lead to a substantial decline in populations of these species along much of the Lower American River. Such a loss would be significant under CEQA, and no mitigation has been proposed to mitigate this impact.</p>
5-24	5.1.15	<p>Cumulative Impacts, Vegetation and Wildlife. The cumulative effects analysis in the SEIS/SEIR is superficial and misleading. The proposed projects do not just “have potential” to contribute to the loss and degradation of sensitive and other habitats, they will clearly do so.</p> <p>The impacts of this and other projects are not quantified, and thus are not evaluated for their effects in the SEIS/SEIR or available for public review and comment. These impacts should be quantified to the maximum extent possible. In particular, what proportion of the bank area along the American River will be denuded by project actions in various reaches by proposed and past flood protection actions and how will that affect dependent wildlife species, vegetation, and human uses?</p> <p>The document also does not address the indirect cumulative effect of all projects shifting public use to the remaining lands that retain wildland character in the American River Parkway. Increase use of remnant areas with wilder character will lead to increased creation of unauthorized foot trails, erosion, vegetation damage, and wildlife disturbance.</p> <p>As noted elsewhere in this comment letter, the adopted mitigation measures are incomplete and ineffective in meeting a standard of causing the least amount of environmental impact. The acknowledgement that mitigation measures would not be able to reduce effects to a less-than-significant level requires that the project proponents explore design modifications and additional mitigation measures that would further reduce impacts, including retention of large trees along riverbanks within contract reaches.</p> <p>Given that the temporal impacts associated with vegetation removal will not be offset for a period of 50 years, it is incumbent on the project proponents to minimize vegetation removal within project reaches to the maximum extent possible.</p> <p>Cumulative impacts of the project are either significant or they are not. It is improper to characterize the impacts as significant for 50 years and then declare them no longer significant. No amount of</p>

53	5-24	<p>5.1.15</p> <p>“overshoot” in ultimate conditions changes the fact that habitat values will be reduced substantially, and thus significantly, over a 50-year period.</p> <p>The cumulative impacts analysis does not consider the effects of climate change and resulting changes in hydrology and reservoir operations on habitats along the Lower American River. Will these changes result in additional impacts to existing riparian vegetation? Will they make proposed mitigation less effective? This impact needs to be incorporated into the cumulative effects analysis.</p>
54	4.2-11	<p>The project clearly is inconsistent with the following General Plan policies:</p> <p>CO-58, CO-59: violated by the destruction of Urrutia Pond</p> <p>CO-88: Violated by removal of the cormorant roosting site within Area 3B North has not been recognized as an impact and for which no mitigation has been proposed.</p> <p>CO-89: The project clearly will not protect, enhance, or maintain riparian habitat.</p> <p>CO-105: The minimal and inadequate public involvement process is a violation of this policy.</p> <p>CO105a: This policy is violated by altering natural topography and vegetation along waterways.</p> <p>CO-111, 121, 122: Violated by extensive vegetation removal and channel bank reshaping.</p> <p>CO-123. Violated by planting of unnatural elderberry orchards that remove much of the herbaceous vegetation in mitigation areas.</p>
55	4.3-1	<p>4.3.1</p> <p>4.3.1. The omission of the extensive information available in eBird and the Sacramento Breeding Bird Atlas (Pandolfino et al. 2021) from the list of resources consulted for the impact analysis renders any evaluation to be inadequate.</p>
56	4.3-3	<p>Table 4.3-1</p> <p>The descriptions in this table illustrate a lack of basic biological information affecting the soundness of the impact analysis. Some corrections:</p> <p>American Badger. Very unlikely to occur anywhere within or near American River sites due to limited amount of grassland, but VELB mitigation will cause a significant impact if any occur, due to loss of potentially suitable herbaceous habitat.</p> <p>Peregrine Falcon. Peregrines nest on the UC Davis Medical Center building (Pandolfino et al. 2021) and likely use the Parkway year-round. They are common in winter along the Parkway and may be affected by reduction in avian prey, including diving ducks and other waterbirds, that are likely to occur due to the loss of Urrutia Pond.</p> <p>Bank Swallow. The last nesting site of Bank Swallows near River Bend Park was destroyed during the nesting season by flood control efforts in the 1980s (D. Airola pers. obs.). The species now occurs only infrequently, if at all, during migration.</p> <p>Purple Martin. Has not nested in trees since the 1970s (Airola 2020). Would not breed in any project areas.</p>

	4.3-3	Table 4.3-1	<p>Western Burrowing Owl. No longer nests along the American River due to development of herbaceous open space lands, removal of hay production and grazing following park establishment, and possibly due to planting use of herbaceous habitat for elderberry mitigation and its invasion by star thistle.</p> <p>Yellow-breasted Chat. Recent migratory occurrences exist. The project area is not outside the species range. The elimination of low terrace habitat has reduced habitat quality. The creation of riparian habitat at Urrutia Pond might attract this species.</p> <p>Yellow Warbler. The characterization does not make sense (describing habitat as what occurs at the Parkway areas and then saying that suitable habitat doesn't exist). Yellow Warblers are sensitive to cowbird parasitism and so are absent from most areas where suitable habitat otherwise exists in the project area and throughout the Central Valley.</p>
57	4-186	4.5.1.1.1	Non-native Invasive Species. This section should note that major infestations of non-native and undesirable star thistle occur in previous mitigation areas developed for bank protection work by the Corps and SAFCA, which has reduced habitat value.
58	4-186	4.5.1.1.2	Calm-water areas, including Urrutia pond, Arden Pond, and backwater areas are especially diverse, regionally uncommon, and of special concern to local agencies, including Sacramento County Parks, and to non-profit conservation organizations. Thus, they qualify as sensitive natural habitats.
59	4-187	4.5.1.2.2	The idea that animals disturbed by loss of habitat resulting from construction of the proposed action can simply “move away from construction activities to unaffected areas” is contrary to the findings of more than a century of wildlife science, which shows that habitat loss generally results in reduction in populations. Evaluation of the degree to which displacement and elimination of habitat would affect current wildlife populations is needed, in particular because of evidence of substantial use of Urrutia Pond by night-roosting waterbirds (Airola et al. 2023) and roosting by substantial numbers of cormorants in trees slated for removal in Area 3B North
60	4-188	4.5.1.2.2	Maintenance plans for mitigation areas should be made available for review by County Parks and citizen groups, given the proponent's failure at adequately maintaining and protecting existing mitigation areas from weed invasions and fire.
61	Table 4.4.1-2	4.1-a	Removal of Urrutia pond and the trees supporting the cormorant roost in Area 3B North would eliminate movements of waterbirds from foraging to roosting areas, which has the potential to reduce regional populations. The mitigation measures do not address these impacts, and they are therefore significant under CEQA
	Table 4.4.1-2	4.1-b	The proposed project will eliminate the largest pond area along the entire Lower American River and thus has the potential to cause the local populations of several waterbird species to be greatly reduced.

	Table 4.4.1-2	4.1-b	No adopted mitigation addresses this impact. Therefore, it is significant.
62	Table 4.4.1-2	4.1-3	The American River Parkway Plan identifies Urrutia Pond as an important and sensitive natural community. Its elimination is a substantial adverse effect that is not mitigated, and therefore is significant.
63	Table 4.4.1-2	4.1-d	Although artificially constructed, Urrutia Pond is fed by subsurface and surface flows, and thereby is federally protected. Its filling is a violation of the Clean Water Act, and no actions are proposed to mitigate the effects in-kind.
64	Table 4.4.1-2	4.1-e	Removal of Urrutia Pond violates Sacramento County Park's American River Parkway Plan
65	Table 4.4.1-3	4.1-c	The removal of 50-150 year-old cottonwoods and valley oaks cannot be considered a temporary impact, regardless of how much new mitigation is planted. This is a significant impact that requires maximum effort to design the project to avoid mature tree removal. This comment applies to all affected areas supporting mature trees. No mitigation is proposed here to protect the Bald Eagle nesting tree
66	4.1-16		Riverine/Open Water. The Osprey is not common in project areas. The species has been recently studied in the region (Airola and Pandolfino 2021; Airola and Estep 2022, 2023), and am not aware of any nests on the Lower American River. The species is increasing, however, and so could become more common and could nest in the future, thereby requiring protection at nest sites. The unique side-channel and off-channel pond habitats, which are used differently than riverine habitats, should be acknowledged here.
67	4.1-17		Non-native Invasive Species. The document should note that a major undesirable invasive species is star thistle, which has invaded numerous past mitigation sites, creating fuel loads that has resulted in repeated fires and loss of planted mitigation stock, such as at River Bend Park.
68	4.1-25	4.1.3	Scoping Comments. Contrary to the assertion here, the proposed mitigation would not comply with the American River Parkway Natural Resources Plan. It also will eliminate nearly all open water in at the Urrutia Pond, and so will not "include...utilizing the open water or a portion thereof for fishing and non-motorized boating." Since the amount of open water area retained is so small and narrow, it will provide a significantly reduced area of off-channel foraging habitat and will not provide suitable roosting habitat for most of the night-roosting species that use this area now.

4.3-14	<p>Yellow-billed Cuckoo. The description of this species' status in the project areas is correct. Given this, the document should explain and justify why the mitigation was focused on this species instead of the many riparian species that are known to occur and that will be heavily impacted by removal of riparian vegetation and especially large oaks and cottonwoods. For example, if a guild of riparian birds had been used in the assessment, the impacts of nest site loss to cavity-nesting birds would have been identified as a significant impact and mitigated through a temporary nest box program.</p>
4.1-28	<p>Movement Effects. The statement that "the proposed action would not interfere substantially with the movement of native or migratory wildlife" is clearly erroneous. As documented by Airola et al. (2023), large populations of several diving duck species, including the Common Goldeneye, Bufflehead, and Common Merganser, move each evening to Urrutia Pond to roost overnight and then return to the American River to forage in each morning. Also, the Contract 3B North site currently supports a nighttime winter roost for an average of >60 Double-crested Cormorants in nonnative black locust trees that overhang the river. It appears that these trees would be removed, thereby destroying an existing daily movement pattern. The used night roosting sites are largely unique within the Lower American River, with the exception of Arden Pond's use by diving ducks. The proposed mitigation will not provide suitable habitat for these purposes. As a result, contrary to the statement "nor would it reduce a population...", the potential exists for a substantial decline in the populations of these species along the American River. To anticipate the proponents' response, winter conditions are believed to be limiting, at least to the diving ducks (see Birds of the World references in Airola et al. 2013), and so it cannot be assumed that they will just relocate somewhere else without effects on numbers.</p> <p>O&M Activities. The proposed actions, which are described to include maintenance of "all project sites" to prevent the establishment of woody vegetation, will result in a permanent impact to many wildlife species, as well as wildlife user groups (birders, hikers), and aesthetics. The proponents should allow stabilizing woody vegetation to grow on bank protection sites.</p> <p>Bald Eagle. The construction buffer distance should be set by a biologist based on testing of the response of birds to equipment and human activity as recommended by Airola (2007). The needed buffer may be greater or lesser than the 660 ft guideline arbitrarily identified as a nationwide standard. It is quite possible that due the recent establishment of this nest and the very low level of baseline human activity, the buffer distance may need to be great than 660 ft to avoid disturbance and potential abandonment.</p>
4.1-29	<p>The statement regarding effects of mitigation on migratory birds is inaccurate and overly simplistic. The mitigation areas will, over a long period of time, improve habitat for certain migratory birds, but will eliminate habitat for others. The elimination of migratory birds that use open water habitat is a significant impact and should be mitigated, which is readily feasible. The conclusion on this page regarding effects on animal movements is inaccurate for reasons previously stated.</p>

74	4.1-30	<p>Similarly, the conclusion at the top of this page regarding effects on wildlife habitat and populations is inaccurate and misleading.</p> <p>MM BIRD-1. Purple Martins will not occur at project sites. No mitigation needed.</p>
75	4.1-31	<p>Nest Protection. Except for a few species with low densities, such as the Yellow-billed Magpie and raptors, it is wasteful and serves no lasting purpose to spend large amounts of money to protect nesting birds from construction, whose populations will subsequently decline anyway due to habitat loss. The proponents should work with agencies to get take migratory bird take permits in exchange for putting the funding that otherwise would be used for avoidance toward some long-lasting conservation measures such as land acquisition or habitat improvement.</p> <p>Bald Eagle. See comments elsewhere regarding customized disturbance buffer determination.</p> <p>Purple Martin. It is completely unnecessary to conduct any surveys for Purple Martins in any construction areas because over 20 years of research and monitoring (Airola 2020) has shown that only a few sites in elevated freeways or road overpasses have supported colonies since the 1970s (Airola and Grantham 2003, Airola 2020, Airola and Kopp 2023).</p>
76	4.1-32	<p>The statement that only “some waterside trees” will be removed from project areas contradicts previous statements that all woody vegetation will be removed and that sites will be maintained to prevent its establishment. It also contradicts the subsequent paragraph which notes “Riparian woodland and riparian scrub would be removed from the erosion protection footprint”. This inconsistency is so fundamental that it prevents us from understanding the project impacts and providing meaningful comment on the SEIR/SEIS, thereby requiring reissuance of a corrected SEIS/SEIR. We, and CEQA requirements, favor use of erosion protection designs that protect as much existing riparian habitat as possible.</p>
77	4.1-32	<p>Nest Boxes. A measure should be added to the mitigation plans for erection and ongoing management of 2 waterfowl nest boxes and 5 songbird nest boxes per acre for several decades to offset the multi-decade loss of nesting habitat for riparian cavity-nesting birds that will occur until mitigation plantings achieve a mature condition. Boxes should be erected and managed according to approved designs and management guidelines by individuals with experience doing so.</p>
78		<p>Overall Impact Conclusion. The project will cause significant long-term impacts to species that depend on open water as night roosting habitat.</p>
79	4.1-33	<p>The commitments to protection and reestablishing vegetation are so vague that they cannot be relied upon as a basis for evaluating impacts. Although short-term effects have been characterized as significant and unavoidable, the proponents should nonetheless commit to a maximum effort to minimize the impacts through the described methods and even other approaches to bank protection and erosion control, if feasible</p>
80	4.3-14	<p>Yellow-billed Cuckoo. Other than the one unconfirmed sighting on a single day, as acknowledged, this species does not occur on the Lower American River. It is thereby inappropriate to base mitigation on the needs of this</p>

4.3-14	species, rather than other riparian species and waterbirds, which depend on habitat in the project area and will be impacted by the project.
4.3-15	Other Breeding and Migratory Birds. This is a very incomplete representation of the diverse and abundant breeding, migratory, and wintering avian community within project areas. Published peer-reviewed studies document breeding by Yellow-billed Magpies in project areas 3B near Oak Meadows Park and in 4a near Larchmont Park and (Airola et al. 2021, Airola 2023). This species has declined by an estimated 85% due to West Nile virus so protecting large trees on riverbanks should be a priority, especially where magpies are nesting there.
4-3.39	<p>Bald Eagle. The DSEIS/SEIR does not address the impacts of aquatic habitat loss on the nesting pairs of Bald Eagles at the Urrutia property. Bald eagles feed both on fish and waterbirds. While the specific basis for selection of the site cannot be known specifically, the presence of the nest adjacent to a pond that supports large numbers of waterbirds and calm waters where fish may be more easily seen and captured is consistent with an explanation that the site was selected because of the presence of the pond. As someone who has conducted research and management on Bald Eagle over 40 years (e.g., Airola 2007), I (D. Airola) believe that elimination of the pond and its replacement with riparian habitat that will obstruct hunting access during those limited periods when it is flooded has potential to displace the eagle pair.</p> <p>Acquisition of the property by public agencies, and its development for mitigation has a high likelihood of resulting in increased legal and illegal human activity and disturbance unless commitments are made to vigorous preventative measures. Such disturbance has a high potential to displace this eagle pair because they are not acclimated to human disturbances (see Airola 2007). Such displacement would be a significant impact. The project proponents should identify mitigation measures to prevent legal and illegal human occupation in areas that would disturb nesting eagles.</p> <p>The determination of bald eagle disturbance buffers should be based on the specific current site condition and tolerances of the nesting pair, as I have recommended (Airola 2007) rather than applying blanket buffer guidelines that are likely inadequate under conditions when background disturbance levels are low, as in this case.</p>
4-3.39	<p>Burrowing Owl. The Burrowing Owl is almost certainly not a breeding or wintering resident in any of the American River project areas. Magpie Creek has the possibility of supporting owls.</p> <p>It is not evident that proper surveys were conducted for this species to characterize potential project impacts in suitable habitat around Magpie Creek. Surveys and impact evaluation should be conducted by a professional with experience in dealing with this issue. Chris Conard with Sacramento Regional County Sanitation District is the expert on Burrowing Owl in Sacramento County and should be consulted.</p>

	4-3.39	The adopted mitigation measures do not address the potential impacts of removing grassland habitat, removing burrows, and displacing owls from their burrows. Continual enactment of mitigation measures as outlined in this document has contributed to the near elimination of the species from Sacramento County (Pandolfino et al. 2021, C. Conard, pers. comm.). If Burrowing Owls are found to occur in project areas, measures should be taken to avoid disturbing their burrows. The effects of habitat disturbance and long-term changes need to be properly evaluated. If the project results in impact to occupied or recently occupied habitat, appropriate mitigation measures should be adopted, including purchase of local mitigation credits for Burrowing Owl (which may not be available), establishment of a relocated population (which has been done successfully in San Diego County), and/or acquisition, protection, and enhancement of existing occupied Burrowing Owl habitat that otherwise would likely become unsuitable over time.
84	4-3.41	Least Bell's Vireo. It is certain that Least Bell's Vireo does not nest currently within project areas, as there have been no records despite widespread birder activity. To my knowledge there are no records of any migrant Bell's Vireos anywhere in Sacramento County, nor would they be expected because there are no nesting populations to the north of the County. There should be no significant impacts and no mitigation is required. There is a small possibility that the species could colonize project areas in the future. At that point potential conflicts might occur with long-term management programs.
85	4.3-43	Yellow-billed Cuckoo. With the exception of one sighting, there is no evidence that cuckoos use the Lower American River corridor during migration, despite thousands of bird checklists being recorded in eBird during the migration period. The impact of habitat loss to migrating cuckoos is clearly not a significant impact that requires mitigation.
86	4.3-43	White-tailed Kite. The expense incurred in surveying for and protecting kite nests from short-term disturbance could be better spent on managing habitat for the species to provide long-term benefits. The main impact of the project to White-tailed Kites is the misguided effort to plant elderberry orchards in a large amount of the remaining available space where herbaceous habitat occurs along the American River, and the resulting invasion of disturbed area by star thistle. This impact should be mitigated by enacting management to reduce star thistle in remaining herbaceous habitat areas through prescribed grazing, burning, mowing, and/or seeding.
87	4.3-43	Other Breeding and Migratory Birds. This depiction of impacts is incorrect and misleading. As documented in a peer-reviewed study (Airola et al. 2023), a wide variety of waterbirds use the Urrutia Pond during winter, not just diving birds. To suggest that birds do not use the pond during other seasons is completely unsupported. Although bird use during other seasons has not been well documented due to restricted access, it should be the responsibility of the lead agencies to conduct such studies, not us commenters.
88		The impacts described for other species are limited to the direct effects of disturbance during construction, as if there is an unlimited supply of habitat

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4.3-43	<p>that individuals can move to and survive. This, of course is an idea contrary to more than a century of wildlife biological science.</p> <p>The created mitigation area will not function as a mature riparian woodland for decades, during which time populations of dependent species will decline. Therefore, the proponents should adopt project design measures that minimize these temporal losses, including protecting all existing habitat to the maximum extent possible. This also will reduce the mitigation need and reduce the impacts of the Urrutia mitigation project itself, which is a significant impact requiring its own mitigation.</p> <p>The proponents should also adopt measures to encourage colonization of the mitigation area by cavity-nesting birds, by supporting a nest box program at the mitigation site for a period of not less than 20 years, or until the vegetation matures sufficiently to allow primary cavity nesting birds (i.e., excavators) to colonize the site. Because the impacts to riparian birds, and thus cavity nesting birds, are significant, and the mitigation is highly feasible and effective (Airola and Stine 2023), its implementation is required.</p>
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Appendix D

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Comment 5-1	<p>It should be made clear that, while it is difficult in general to comment on project environmental documents, the Corps appears to have gone out of its way to make public comment as difficult as possible. To some degree, it is refreshing that the Corps acknowledgment that it doesn't care to do anything to facilitate public involvement beyond the absolute minimum required by law. It remains to be seen whether, with the obvious impediments that the Corps has erected, it will be determined that it indeed met that minimal standard. Regardless, its approach violates a public agency's basic responsibilities to involve and be responsive to the public.</p>
Comment 5-2	<p>Who has determined what surveys are required? The request was for surveys to be conducted prior to the release of the SEIS/SEIR so that the results could be incorporated into the impact analysis. It appears that the proponents chose not to do the surveys because they wanted to avoid addressing the important issue of waterbird use of the Urrutia pond, of which they had been made aware. As a result, the analysis of impacts is incomplete and inadequate. Conducting bird surveys prior to disturbance makes no sense other than to avoid nesting birds. Why would they be done, unless they influence the subsequent design. Wintering waterbirds fly, so there is no purpose in conducting pre-disturbance surveys for them. Please explain what you are proposing to do and why.</p>

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Post Office Box 1526 | Sacramento, CA 95812-1526

February 23, 2024

United States Army Corps of Engineers
Public Affairs Office
Attn: ARCF SEIS
1325 J Street
Room 1513
Sacramento, CA 95814-2922
ARCFSEIS@usace.army.mil

State of California
Valley Flood Protection Board
Attn: ARCF SEIS/SEIR
ARCF16@water.ca.gov

Subject: Comments on the draft American River Common Feature, 2016 Flood Risk Management Project (project) Sacramento, California Supplemental Environmental Impact Statement/Supplemental Environmental Impact Report (SEIS/SEIR)

The Environmental Council of Sacramento (ECOS), a consortium of local and regional environmental and community-based organizations, is providing the following comments on the Draft SEIS/SEIR prepared for the subject project.

1 In summary, ECOS believes the Draft SEIS/SEIR document is significantly flawed, and the
scoping process used in its development is inadequate. We request that both agencies reopen the
scoping process to ensure full public participation and the development and analysis of viable,
2 protective project alternatives. The document fails to clearly articulate the reasons for the project,
and the need for, and the extent of, vegetation removal necessary to accomplish the project's
objectives. Regarding this latter point, additional analysis and alternatives need to be considered
and evaluated to ensure maximum protection of the American River Parkway is afforded while
also accomplishing the project's bank and levee protection objectives.

3 An ineffective public participation process has been used while developing the Draft SEIS/SEIR
document. The public participation process has failed to explain the need for and necessary
components of the project. The comments being submitted by the County of Sacramento, other
community groups, and members of the public demonstrate in part the public involvement
process deficiencies. These deficiencies need to be corrected both through an expanded, in
person, public participation process, and an expanded analysis and study to establish the most

effective techniques that preserve the American River Parkway and attendant vegetation and improve riverbank and levee integrity.

4

ECOS understands and supports the importance of regional flood protection. Recent actions to improve the Folsom Dam complex and the banks and levees at other portions of the lower American River are designed to afford Sacramento communities a higher degree of flood protection. ECOS fully supports these goals. We also support the protection of both the American River's banks and levees in the project areas. We understand that the river channel and flows in these areas can pose a significant risk to the existing banks and levees. This increased risk could result in flooding and potential damage to the American River Parkway and the adjacent community when maximum reservoir releases caused by extreme storm water events are required. While this project is intended to mitigate these impacts, ECOS also believes the project can be designed and constructed to minimize the impacts to the adjacent environmental resources and the American River Parkway. The Parkway is a regional jewel, a wildlife corridor, and is enjoyed by over eight million visitors every year. This project should go forward only after all efforts to ensure the Parkway's protection have been analyzed, and appropriate project improvements are incorporated into the project design and implementation.

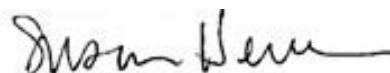
5

ECOS strongly recommends that going forward, the Corps and the Board initiate a series of public meetings/workshops that include public tours of both earlier completed bank/levee work and the proposed sites so that understanding of the need for the specific outcomes can be understood by community members. It is important to keep in mind that community residents live and visit the Parkway. They have a vision of the Parkway's beauty and what it affords for wildlife and native plants. The project as currently formulated will change the vision for twenty to thirty years – for some the rest of their lives.

ECOS stands ready to work with the County, other community groups and the project proponents to help in any way we can to expand community engagement, improve the project alternatives and accomplish a positive outcome for this project.



Ted N. Rauh
ECOS Water Committee Chair



Susan Herre
President, ECOS Board of Directors

Cc: Sacramento Area Flood Control Agency, Water Forum, Regional Water Authority

SARA-1

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 22, 2024 2:39 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS; Romine, Guy K CIV USARMY CESPK (USA); Martin, Nathaniel J CIV USARMY CESPK (USA); Duey, Keleigh L CIV USARMY CESPK (USA); Saucier, Melanie
Subject: [EXT] FW: [Non-DoD Source] Comments on Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV
Attachments: SARA-Comments-on-Draft-AR-Common-Features-2016-Flood-Risk-Management-Project-Sacramento-California-SEIS-SEIR.pdf

From: Save the American River Association <info@sarariverwatch.org>
Sent: Thursday, February 22, 2024 2:24 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments on Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV

Please see the attached comments re: Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California - Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV from Save the American River Association.

Sincerely,

Sara Stephens

Save the American River Association (SARA)

Guardians of the American River and Parkway since 1961

8836 Greenback Lane, Ste. C, Orangevale, CA 95662 | (916) 936-4555 | www.sarariverwatch.org



Save the American River Association

8836 Greenback Lane, Suite C • Orangevale, CA 95662
916-936-4555 • E-mail: info@SARAriverwatch.org • www.SARAriverwatch.org

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Ron Suter
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Eric Webb
Dan Winkelman

February 22, 2024

Via E-mail

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 Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV

Mr. Romine and Mr. Brown:

I. Introduction

These are the comments of the Save the American River Association (SARA) on the Draft American River Common Features, 2016 Flood Risk Management Project, Sacramento, California, Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV (DSEIS/SEIR).

The Save the American River Association (SARA) was founded in 1961 to protect the Lower American River and establish the American River Parkway. We have persisted since that time as lead advocate for the preservation and conservation of the Lower American River and Parkway. As such, we are greatly concerned with the work which is proposed for Contracts 3B and 4B, which evidently would result in the loss of very many trees.

We wish to thank the U.S. Army Corps of Engineers (Corps) and Central Valley Flood Protection Board/Department of Water Resources for extending the public comment deadline from February 5 to February 23. That extension greatly improved our ability to submit meaningful comments.

II. Contract 3B

a. Incomplete information presented and limited hydrologic modeling used to determine areas of risk and work

SARA had and has a representative on the Lower American River Task Force (LARTF) and its Bank Protection Working Group (BPWG), the latter of which was

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responsible for the initial identification of the areas of work and initial project design in Contract 3B. As such, we are aware to some extent of the process and considerations involved. Unfortunately, this information was not made available to the broader public through the DSIES/SEIR or the two public meetings provided by the Corps. This has resulted in great consternation among residents in the areas of Contract 3B as well as a proliferation of misinformation. It would benefit all concerned if the final environmental documents added the hydrology and geomorphology which were involved in identifying the Contract 3B areas as being high risk. Also, a review of why specific designs for Contract 3B were chosen should be included.

On page 4-151 of the DSEIS/SEIR it states:

“The effects of the Proposed Action on water surface elevations were evaluated using the Hydrologic Engineering Center’s River Analysis System (HEC-RAS) computer software. HEC-RAS performs one-dimensional steady flow, one- and two-dimensional unsteady flow calculations, sediment transport/mobile bed calculations, and water temperature/water quality modeling.”

A one-dimensional hydrologic model divides the river into a series of cross-sections, and assumes that all of the water in a given cross-section has the same velocity. A two-dimensional model takes the cross sections and divides them into columns of water, which can have different velocities from other columns of water in the same cross section. However, it still assumes that all of the water in a given column has the same velocity. A three-dimensional model divides the columns into cells which could each have different velocities from other cells in the same column or other columns (1).

The three-dimensional model should be closest to reality. The assumption in the one-dimensional model that all of the water in a given cross section has the same velocity is obviously not true, as the velocity varies both by lateral position and depth. In the two-dimensional models, the assumption that all of the water in a given column has the same velocity is more subtly false as friction from the bed, banks, berm, or levee side will slow the adjacent water, as will friction and turbulence from trees. The main justification for using a one- or two-dimensional model is that the amount of computations needed for the higher dimension models increases exponentially.

It is our understanding that when the BPWG assessed various areas of the Lower American River levee system to be of high risk of failure, it was based upon a two-dimensional hydrologic model. It is apparent from the above quote that the Corps has continued with one- and two-dimensional modeling in its work.

Recently, with the advances of available computing speed and power, three-dimensional modeling of river systems has become more common.

For example, recent research articles used a three- dimensional hydrologic model of a portion of the Lower American River downstream of the Contract 3B area. These articles arrived at the conclusion that the presence of trees along the banks of the river reduced the velocity and scour of the river near the banks and increased the velocity and scour in the middle of the river channel compared to the same model without trees (2, 3). These results lead to a couple of questions concerning the hydrologic modeling involved in the Contract 3B proposal.

First, were trees represented in the hydrologic models used by the Corps, and if so, how was this accomplished?

Second, would the Corps and/or its partners be willing to pause the project and rerun the assessment of risk of erosion using a three-dimensional hydrologic model with trees? If not, why not?

b. Incomplete information presented and limited hydrologic modeling used to determine project designs

As stated above, SARA had a representative on the LARTF and BPWG. Consequently, we are aware of some of the evolution of project designs of Contract 3B. However, this information was not made available to the public in the DSEIS/SEIR or either of the Corps' public meetings. We encourage the Corps and CVFPB to include this information in the final environmental documents. Similar questions arise to those cited above.

First, were trees represented in the hydrologic models used by the Corps for refining designs, and if so, how was this accomplished?

Second, would the Corps and/or its partners be willing to pause the project and rerun refinement of designs using a three-dimensional hydrologic model? If not, why not?

Finally, were designs considered which did not involve the placement of large amounts of rock (see for example reference 4), and why were those designs rejected?

c. Lack of information on impact on trees of Contract 3B

One of the great shortcomings of the DSEIS/SEIR is the lack of information of the impact on trees of Contract 3B. Summary information on tree losses was presented by Corps Project Manager Amanda Barlow at the LARTF meeting on 12-12-23. The information presented indicated that the 95% designs would involve the removal of 685 trees, the majority (522) in the Site 4-1 area. While we applaud the progress of the Corps and its partners in reducing the impacts as project designs evolved, we strongly feel that further progress in this regard is needed.

3

Also, much more information needs to be presented in the documents. Ideally, this should include an arborist's report of all trees in the project area, including whether they are to be removed or not, their geographic location, species, and size. Also, a summary table showing species of trees, size range of trees, total numbers of trees to be left in place and total numbers of trees to be removed would be most useful. Finally, maps of the locations of trees to be left in place or removed would also be most useful. This sort of information seems to us to be required by the National Environmental Policy Act (NEPA) and California Environmental Quality Act (CEQA).

III. Contract 4B

The main question about contract 4B is: Why is it in the DSEIS/SEIR at all? The proposal is so incompletely described as to make it impossible to make more than generic comments. Two figures purported to portray the activities that would be undertaken, Figures 3.5.2-11 and 3.5.2-12 (text p. 3-42), are nowhere to be found. Even the Table of Contents skips from Figure 3.5.2-10 to Figure 3.5.2-13. Further, this proposal has NOT been presented at any LARTF or BPWG meeting that we are aware of. There is not even summary information on how many trees would be impacted. This

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proposal should be removed from the final document and recirculated when there is adequate information for people to comment on it.

That being said, consider as a generic comments and questions on Contract 4B all of the comments and questions on Contract 3B above in sections IIa, IIb, and IIc. Please respond with specifics for Contract 4B.

IV. American River Mitigation Site (ARMS)

We are pleased that the Urrutia property appears to be on the way to being acquired by the Sacramento Area Flood Control Agency (DSEIS/SEIR p. 4-177). This marks a considerable addition to the Lower American River Parkway. However, the use of the site for the proposed American River Mitigation Site (ARMS) has some problems. As documented by Airola et al 2023 (5), there is considerable use of the pond in the middle of the site by wintering waterbirds. It is likely that loss of this pond, as proposed in the DSEIS/SEIR ARMS, would have a detrimental effect on said waterbirds. Accordingly, some modification of the proposal to retain at least part of the pond should be adopted.

An important concern that arises is a statement in the DSEIS/SEIR: “Table 3.5.5-1 presents the mitigation needs for all the ARCF Project contracts, not only the American River Contracts, to be met at the ARMS.” We think it is inappropriate to be meeting mitigation needs from ARCF Projects outside of the Lower American River Parkway, if that results in detrimental effects on the Lower American River Parkway. We note in particular that the estimated off-site mitigation acreages from Contract 3B are considerably smaller than the acreages for the ARMS proposal in Table 3.5.5-1, with the exception of Valley Elderberry Longhorn Beetle (VELB), which is only slightly smaller. See table below. It is likely that the Contract 3B acreages are nearly all of the needed acreages since the only other site on the Lower American River is Contract 3A, which is a very small project located adjacent to the levee (one acre of flood reduction work [DSEIS/SEIR p. 4-143], including 0.6 acres of pond fill [DSEIS/SEIR p. 4-157] which is to be mitigated by purchase of credits at a U.S. Fish and Wildlife Service approved mitigation bank [DSEIS/SEIR p. 4-192]).

Comparison of off-site mitigation acreages for Contract 3B to ARMS proposals

Impact category	Contact 3B off-site mitigation acreages*				ARMS Proposed**	ARMS Alternative 4b***
	Site 3-1	Site 4-1	Site 4-2	Total		
Salmonid	16.78	15.17	0	31.95	66	47
Riparian/YBCU	5.78	7.94	0.58	14.30	72	29
VELB	2.76	19.32	0.81	22.89	23	22
Seasonal Wetland	?	?	?	?	6.6	?

* Data from presentation by Corps Project Manager Amanda Barlow to LARTF 12-12-2023. Salmonid data from 65% design, and Riparian/YBCU and VELB from 95% design.

** Data from DSEIS/SEIR p. 3-70 Table 3.5.5-1

*** Data from DSEIS/SEIR p. 3-98

ARMS alternative 4b would retain a part of the existing pond, which should be of value to the waterbirds. We point out that the ARMS Alternative 4b acreages would exceed by a considerable margin the required totals for off-site mitigation for salmonid and Riparian/YBCU. Only the VELB is

slightly smaller. It seems to us that the small additional amount (one acre) of VELB acreage could be accommodated by the other VELB sites on the Lower American River, such as Rio Americano or Rossmoor Bar.

It is our understanding that the Central Valley Bird Club comments on the DSEIS/SEIR make an additional recommendation wherein a rounder pond configuration north of the eagle's nest would be combined with two mitigation connections to the river, one east and one west of the nest. We think that such an alternative should be considered and would likely be preferable to the proposed action.

V. Miscellaneous comments

a. Aesthetics and Visual Resources: Long term impact significant

6

On page ES-12, under the row Aesthetics and Visual Resources for American River Erosion Contract 3B North and South, Contract 4B, SRMS and ARMS, it is indicated that long term impacts under CEQA are "less than significant with Mitigation Incorporated" and under NEPA are "less than significant." The same assessments are also presented on p. 4-141 in Table 4.3.1-2, Impacts 3.1-a and 3.1-c. We disagree strongly with these assessments. Indeed, the assessments in the cited tables are inconsistent with the text of the DSEIS/SEIR. On p. 4-144, under American River Erosion Contract 4B, it states: "Even though there will be an attempt to save every native tree impacted at the American River Erosion Contract 4B site, the possible need to remove heritage oaks would create long term significant and unavoidable impacts."

Both Contracts 3B and 4B have the potential to remove large heritage trees that are more than 100 years old. While small trees may be planted near the site to replace these trees, they will not achieve the size of the large trees for decades or centuries. The aesthetics of large trees are quite different from those of small trees. Hence the long term effect is significant under both CEQA and NEPA. This should be acknowledged in tables and text in the final environmental document.

b. Table of Vegetation Impacts out of date

7

On p. 4-195 of the DSEIS/SEIR, Table 4.4.1-4 sets forth the "Vegetation Impacts for ARCF GRR SEIS – Proposed Action." If the title is accurate, these are the vegetation impacts as identified in the General Reevaluation Report from 2016 (GRR). However, the proposed actions in the DSEIS/SEIR differ substantially from the proposed actions in the GRR. Hence, the table is misleading and inaccurate. It should be replaced with a table that reflects the impacts of the proposed actions in the DSEIS/SEIR.

c. Future maintenance of launchable rock

8

Some of the designs of erosion protection involve launchable rock. Some questions arise: Which organization would be responsible for repair should a flood event occur which resulted in the launching of the rock? What exactly would this consist of? And, how would it be financed?

One additional point: it would be of interest to see if there is precedent for the launching of the rock and how it turned out. Pictures would be helpful.

d. Organization of pages inconsistent

Looking at the Table of Contents (pp. ii and iii), we find inconsistent and confusing numbering of pages. Whereas most chapters have the format chapter number-page number, beginning with page 1 (e.g. 1-1, 3-1, 5-1 etc.), two of the chapters deviate from this. Chapter 2 begins with page 2-8, proceeds to 2-9, then reverts to 2-1 followed by 2-3. The actual pages in the document are consistent with this page numbering. Very confusing. Also, Chapter 4 begins with page 4-108 instead of 4-1. Possibly some technology has baffled the authors of the DSEIS/SEIR. This should be remedied in the final environmental document.

9

e. Organization of appendices confusing

In the .pdf documents made available to the public on the Corps' web site, Appendix B is found in the .pdf document labeled as "draft SIES-SEIR report." However, all other appendices are found in a .pdf document labeled as "draft SEIS-SEIR appendices." The appendices document is lacking in Appendix B. This has caused considerable confusion, as people have reported searching in vain in the appendices .pdf for Appendix B. Another problem this has created is that people looking in the main report .pdf have gone to the end of the .pdf document in search of Chapters 6 through 10, and found only the end of chapter 5. This is because Appendix B ends with Chapter 5. All in all, this arrangement has confused many people, and should be modified in the final environmental document.

VI. Concluding remarks

We greatly appreciate the enormous efforts that have gone into the identification of areas of risk of levee failure at 160,000 cubic feet per second of flow in the Lower American River, as well as the refinements to design that reduce the impacts on habitat and vegetation, especially trees. None-the-less, the remaining impacts are quite large: some 685 trees are likely to be removed in Contract 3B and an unknown number in Contract 4B. It seems to us that the advancing technology, in particular the deployment of three-dimensional hydrodynamic models capable of including trees, call for a pause and reevaluation of the risks and designs set forth in the DSEIS/SEIR. Also, it would be desirable to re-activate the BPWG and involve it in said reevaluation. Likewise, greater efforts should be made to reach out to the general public in the reevaluation. It would be a great shame to lose so many trees along our State and Federally protected Wild and Scenic Lower American River if such losses are not, in fact, justified.

Thank you for your attention to these considerations.

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References:

- (1) Glock,K. et al. (2019) Comparison of Hydrodynamics Simulated by 1D, 2D and 3D Models Focusing on Bed Shear Stresses. Water 11, 226.
<https://doi.org/10.3390/w11020226>
- (2) Flora, K, Santoni, C & Khosronejad A (2021) Numerical Study on the Effect of Bank Vegetation on the Hydrodynamics of the American River under Flood Conditions. J. Hydraul. Eng. 147(9):

05021006.

<https://ascelibrary.org/doi/10.1061/%28asce%29hy.1943-7900.001912>

- (3) Flora, K & Khosronejad A (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>

- (4) Federal Emergency Management Agency (date unknown) Engineering With Nature: Alternative Techniques to Riprap Bank Stabilization.

https://www.fema.gov/pdf/about/regions/regionx/engineering_with_nature_web.pdf

- (5) Airola D.A., Geiger M. & Goodrich, S. (2023) The Importance of Off-Channel Ponds to Wintering Waterbirds along the American River in Sacramento, California: An Initial Assessment. Central Valley Birds 26 (3) 69

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James Morgan, SARA Board member



Stephen Green, SARA Board President



sierraclubsacramento@gmail.com

1722 J Street #226
Sacramento, CA 95811

February 23, 2023

Mr. Guy Romine
Attn: Environmental Analysis Section (CESPK-PDR-A)
U.S. Army Corps of Engineers, Sacramento District
1325 J Street
Sacramento, California 95814

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

Sent 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 specific to Flood Risk Management Project Plans 3B, 4A and 4B

Dear Mr. Romine and Mr. Brown,

intro

I am writing on behalf of the Sierra Club, Sacramento Group regarding our serious concerns with the proposed American River Flood Risk Management Project. We have reviewed the draft supplemental EIS/EIR and many of the letters submitted from experts detailing a number of inadequacies in the documents and including recommendations for less impactful yet proven effective methods of ensuring adequate flood control and more effective mitigation measures. We are in support of the many calls to revise this project, aligned with the principles of “engineering with nature”, with an approach that involves far less removal of existing vegetation and native trees, and with improved communication throughout the process of developing the final plan with the local community and governmental agencies.

1

The current EIS/EIR documents do not fully characterize the significant impacts, nor provide adequate mitigation measures or define feasible approaches that would mitigate impacts to less than significant. 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).

2

3

In addition to creating an increase in carbon emissions over the two-year course of preparation and construction that is proposed, there is no mention or adequate plan to account for the loss of carbon sequestration that will occur when over 500 trees (including decades- and centuries-old native oaks),

and vegetation are removed. In light of the fact that the Sacramento Area Council of Governments is currently developing a regional land use and transportation plan to comply with the statewide mandate to reduce VMT/GHG by 19 percent by 2035 an increase in carbon emissions without a revised plan to significantly reduce the number of trees and amount of vegetation lost is unacceptable. The proposed mitigation of the trees lost, at a ratio of 2 replacement trees per tree removed, cannot even come close to mitigating for the carbon sequestration value lost as replacement trees at that, or even at the higher ratios consistent with Sacramento City and County requirements, will not occur for many decades. The EIS/EIR documents lack adequate support for the USACE claim that the extent of tree and vegetation removal and the proposed streambank “erosion” control methods are needed for flood safety in this zone.

A December 2017 study, quoted below, illustrates the value of carbon sequestration provided by existing mature landscape. The 2017 Sacramento County Landscape Carbon Assessment, commissioned by the Sacramento Metropolitan Utility District, highlighted the value of native trees and vegetation in section 3.1, page 29 of their report. As the American River Parkway spans 23 miles and 4,800 acres of Sacramento County, the corridor comprises a good portion of the identified lands that sequester at least 8% of the carbon in the region.

3 *“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).”*

Production team credits: Kathleen Ave (Client), WSP Project manager Tim Kidman (Technical Director) Chris Bruno (Technical Director), Subconsultants Patrick Huber (Lobata Group), Beth Kelly & Patty Cubanski (Burlison Consulting)

5 The USACE must include an inventory of the carbon sequestration value of the land they are intending to denude as well as a plan to mitigate for all carbon sequestration that is lost. They must also reevaluate the design choices and markedly reduce the many other “significant unavoidable” environmental impacts, develop more refined, less impactful alternative methods for project subcomponents, and conduct an adequate environmental analysis of the impacts of the revised project and its subcomponents; proceeding only where justifiable needs are identified. All native oaks must be protected and retained along the levee and staging areas must be placed where they will not impact native oak trees.

We request that the USACE and the Central Valley Flood Protection Board reject the adoption of the current draft supplemental EIS/EIR and engage in developing a more comprehensive environmental document to address the numerous deficiencies in the current document, develop less destructive and more environmentally sound methods of providing erosion control only in areas where it is deemed absolutely necessary.

4
summary

summary

We support the multitude of comments submitted in support of a less impactful approach by other concerned environmental organizations and individuals with expertise in flood control and management of biological and natural resources. The letters we support include, but are not limited to, the following and we incorporate their comments into this letter by reference:

Save the American River Association

Dan Meier, Sacramento Valley Chapter, California Native Plant Society

Dan Airola, Central Valley Bird Club

William Avery, PhD, Professor Emeritus CSUS

Liz Bellas, Sacramento County Regional Parks

Michelle Stevens, Professor Emeritus CSUS, Bushy Lake Project Team

Brenda Gustin and Mark Berry, Preserve the American River

Justin Augustine, Senior Attorney for the Center for Biological Diversity

Josh Thomas, PhD Candidate, History Department, UC Davis

Butterfield – Riviera Neighborhood Association

Bill Brittain, P.E.

Ted Rauh, Environmental Council of Sacramento


Fred Kindel, retired USACE Wildlife Biologist, Chief, Environmental Planning Branch

Gerald Djuth, retired PE civil engineer

Additional individual submissions from American River Trees Steering Committee members - Peter Spaulding, Alicia Eastvoid, Matthew Carr, Beth Schwehr

Thank you for your consideration of our requests.

Sincerely,



Barbara Leary, Chair

Sierra Club Sacramento Group

From: [DWR Public Comment ARCF 16](#)
To: [Sutton, Drew](#)
Cc: [Martin, Nathaniel J SPK](#); [Duey, Keleigh L CIV USARMY CESPK \(USA\)](#)
Subject: [EXT] FW: Testing
Date: Thursday, December 28, 2023 9:56:05 AM

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

From: Avery, William E <averyw@csus.edu>
Sent: Tuesday, December 26, 2023 2:12 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Testing

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

Testing - disagreement on USACE site instructions vs. FAQ

Sent from my iPad

From: [Martin, Nathaniel J CIV USARMY CESPK \(USA\)](#)
To: [Sutton, Drew](#)
Subject: [EXT] FW: [Non-DoD Source] Contract 3B RE: ARCF SEIS PUBLIC COMMENT
Date: Thursday, December 28, 2023 10:18:39 AM

From: etak123@aol.com <etak123@aol.com>
Sent: Wednesday, December 27, 2023 7:41 PM
To: Burns, Lucas W CIV NWP <Lucas.W.Burns@usace.army.mil>; Stalker, Tyler M CIV USARMY CESPK (USA) <Tyler.M.Stalker@usace.army.mil>
Cc: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Subject: Re: [Non-DoD Source] Contract 3B

Mr. Bruton,
Since Tyler is out of the office, what is the agenda for the January 10th and January 16th meetings? Will the public have time to talk, or is the talking only going to be one-way (from your side)? I'm sure you have pre-planned presentations, but will there be any time for the public to speak?
Thank you,
Kate Rosenlieb

On Monday, December 18, 2023 at 10:23:38 AM PST, Stalker, Tyler M CIV USARMY CESPK (USA) <tyler.m.stalker@usace.army.mil> wrote:

Yes, I believe all of those topics can be addressed at a level of communication the community will be able to understand and provide comments on. We can certainly check back in after Jan 16 and see if there are any gaps that we've missed.

Respectfully,

Tyler

Tyler M Stalker

Deputy Chief of Public Affairs

U.S. Army Corps of Engineers, Sacramento

Office: 916-557-5107

Mobile: 916-396-2831

From: etak123@aol.com

Sent: Monday, December 18, 2023 10:15 AM

To: Burns, Lucas W CIV NWP <Lucas.W.Burns@usace.army.mil>; Stalker, Tyler M CIV USARMY CESPCK (USA) <Tyler.M.Stalker@usace.army.mil>

Cc: Bruton, J Paul CIV USARMY CESPCK (USA) <Joseph.P.Bruton@usace.army.mil>

Subject: Re: [Non-DoD Source] Contract 3B

Thank you for your prompt response Tyler. I really appreciate good communication so thank you. I hope when you do the January 10th and 16th virtual meetings, you "dumb it down" for us non-engineers and be able to help us visualize each stage of the Proposed Action Alternative. Everyone has their own concerns (flood, tree removal, vegetation removal, wildlife displacement, etc.), and so I hope each of those are addressed.

I feel "tie backs" and "launchable toes", and "launchable trench" may provide technically accurate language it's just not adequate for us "average joes" to comprehend. (With "average joe" being us non-engineer, non-biologist, non-hydrologist types).

Here's my "average joe" take....I live in a magical forest along the American River. I believe you're going to rip away some or mostly all of my magical forest in the name of flood protection. I want to understand that plan. When the slurry wall was installed, my street was filled (no exaggeration) with deer, and bunnies, and coyotes, and turkeys, and raccoons, and snakes and skunks and the list goes on, that were displaced. And, that project was far less invasive (or so I believe) than what you're about to do. And I'm 68 years old.

1

What kind of replanting will you do? How long will it take to have a forest again? Will it happen in my lifetime? I believe from your earlier work you've already done near Cal State, you likely already understand what the "average joe" is worried about here.

Thank you!

Kate Rosenlieb

On Monday, December 18, 2023 at 09:57:27 AM PST, Stalker, Tyler M CIV USARMY CESPK (USA) <tyler.m.stalker@usace.army.mil> wrote:

Hi Kate,

Thank you for the message. I completely understand people feeling overwhelmed by the document. We are scheduled to host two virtual public meetings that will discuss the contents of the document and answer questions on January 10 and January 16. I'm not going to be in the office for the next couple of weeks, so I've included Paul Bruton who may be able to assist further but I believe those two meetings may be the best opportunity for your community to learn about the details of the proposed work. Please let me know if there's anything else I can do for you.

Respectfully,

Tyler

Tyler M Stalker

Deputy Chief of Public Affairs

U.S. Army Corps of Engineers, Sacramento

Office: 916-557-5107

Mobile: 916-396-2831

From: etak123@aol.com <etak123@aol.com>
Sent: Monday, December 18, 2023 8:38 AM
To: Stalker, Tyler M CIV USARMY CESPCK (USA) <Tyler.M.Stalker@usace.army.mil>; Burns, Lucas W CIV NWP <Lucas.W.Burns@usace.army.mil>
Subject: [Non-DoD Source] Contract 3B

Good morning gentlemen:

I am Kate Rosenlieb and live at 9246 Linda Rio Drive in Sacramento. I have reached out to your communications team a couple of times now regarding the upcoming Contract 3B and have received communication back from you Luke. Another neighbor of mine has reached out to you regarding Contact 3B and received communication back from you Tyler.

Contract 3BC will have significant ramifications for my neighborhood. I see the draft supplement environmental documentation is out. I have 3 college degrees, and have spent some time reading it, but given my degrees are business oriented, I find I am still feeling left in the dark about the plan due to the technical language in the document.

I am interested in understanding this project. I think I have a number of neighbors who are interested in understanding this project. **I am asking if you would consider coming to our neighborhood (I will have a venue for this) and provide a overview of what the "Proposed Action" alternative is in non-technical, anyone can understand it language?**

Is that possible? I do believe one of the reasons people are somewhat skeptical (sorry but true) of the Army Corp is the real or perceived lack of communication. I'm sure as the communications team you believe you are doing a good job of communicating the plan, but there is a real gap between sending out a 1,000 or so page technical document and people's understanding.

I will offer to have the venue (either my community center or preferably my local elementary school auditorium), and will host (to be sure order is kept and people listen when they're supposed to).

What do you think? Just thought I'd give this a try.

Kate Rosenlieb

916-208-7632

From: [Martin, Nathaniel J CIV USARMY CESPCK \(USA\)](#)
To: [Sutton, Drew](#)
Cc: [Duey, Keleigh L CIV USARMY CESPCK \(USA\)](#); [Brown, Josh@DWR](#)
Subject: [EXT] FW: [Non-DoD Source] Re: Sac Levee C3B project communications concerns
Date: Thursday, December 28, 2023 1:46:23 PM

From: MHI Gtkpr <mhigtpr@gmail.com>
Sent: Thursday, December 28, 2023 10:30 AM
To: Bruton, J Paul CIV USARMY CESPCK (USA) <Joseph.P.Bruton@usace.army.mil>
Subject: [Non-DoD Source] Re: Sac Levee C3B project communications concerns

Very much appreciate your holiday week response, noted and will review.

We also would like clarification/request that this time during the January 10 meeting, unlike last information session I attended, there could be a bidirectional exchange of information? Or extension of time to accommodate for that?

I realize you may have a large amount of information to impart, however if it is a "comment" meeting, I am hopeful that a well organized series of brief (2-3 min) comments from concerned citizens will be permitted to pose questions and express concerns/alternative considerations to be included on record as well?

We can provide a list of our anticipated speakers/anticipated time and would appreciate your consideration in this regard.

Thank you and Happy new year!

LM

On Thu, Dec 28, 2023 at 10:19 AM Bruton, J Paul CIV USARMY CESPCK (USA) <Joseph.P.Bruton@usace.army.mil> wrote:

Greetings Dr. Merritt

Thank you for submitting your questions and concerns. We take every correspondence seriously. It will take a few more days to provide a more complete response.

For now, please explore the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) which includes Contract 4B. It contains a wealth of information to expand your understanding of our project.

[Draft SEIS-SEIR Report](#)

[Draft SEIS-SEIR Appendices](#)

Public comments will be accepted from December 22, 2023 until February 5, 2024 and can be submitted

to ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov

Past issues of the "American River Erosion Monthly Update" may be found on the [American River Levees](#) page. Look in the left column, down low on the page. The FAQs in the right column (are currently being updated) but may also answer some of your questions. The FAQs are updated periodically to help keep the public informed.

From: MHI Gtpr mhigtpr@gmail.com

Sent: Monday, December 25, 2023 8:39 AM

To: SPK-PAO SPK SPK-PAO@usace.army.mil

Subject: [Non-DoD Source] Sac Levee C3B project communications concerns 12.25.2023

Dear Sac Levee C3B communications team

As we celebrate the 50th anniversary of the Endangered Species Act, and all that has been accomplished, it is with great concern and dismay that I reach out to you, the designated communications officer, regarding the way in which the public, in particular directly impacted neighborhoods, have not been kept informed of this environmentally impactful project.

Reviewing the suggested :

www.sacleveeupgrades.com website

and

<https://www.spk.usace.army.mil/Missions/Civil-Works/Sacramento-Levee-Upgrades/American-River-Levees/>

I see mention of 45 day public comment period, however no "link" through which to make such comments, thus I am reaching out to you as the public information officer, as well as related officials relevant to this. I have # other concerns yet to be posed and would appreciate being advised to whom/where they should be addressed for proper recording in the "comment phase" of this process.

Thank you for the post card received the day the C3B comment period **December 22**-Feb 5, commenced.

However, for many of the members of the affected community who may wish to do so, it is unreasonable to expect capacity to review, research, analyze and comment upon your nearly 1000 page report, work done and anticipated. Unless of course, the intention was that you and the agencies involved, have little interest in such comments, however must check compliance off by sending last minute post cards as Chanukha ends and a few days before Christmas?

This is unacceptable and does not meet standard requirements.

I wish not to believe that, thus I am requesting:

1. Why have we not been receiving these "monthly reports", nor been given more advance notice and time to meet and understand this project?
Can this time please be extended?
2. How will you ensure College Greens, College Greens East, University/American River/Rio Americano and other impacted neighborhoods and businesses will receive back issues of these newsletters and reports to "catch up" as well as future newsletters and reports to "keep up"?
2. How will you ensure better communications going forward including multiple methods of engagement to account for equitable access for wifi access, literacy, language, visual and auditory impairment issues?
3. Given the delay and great interest, there must be longer than 1 hour allotted for the "public meetings" currently scheduled for 5:30 to 6:30 pm on January 10 and 16 and extension of the public comment period
WITH CLEAR DESIGNATION HOW AND WHERE SUCH COMMENTS ARE TO BE SUBMITTED.
4. Looking at the work done thus far, leaving exposed sandy wastelands, I am concerned if there is indeed high flow as usually anticipated during winter months, with planning/timing of where the project is now, will heavy winter rains wash away the unstable sand and "plantings" unable to take proper hold as you yourself mentioned, during the dormant months?
How can and shouldn't this be avoided in future?

My first questions/comments I look forward to hearing clarification upon :

Where are the trees that were planned to be replanted in the areas already shaved down? Looking at your interim photos on previous areas of abatement, looks more like bushes have regrown, is that the ultimate plan- bushes, not more trees? How are we to be reassured and what is the actual timeline for completion of replanting in the already impacted areas?

How might several hundred year old trees be moved and replanted to ensure their continued benefit upon the carbon footprint, Fugitive Dust and water management?

What size are intended replantings?

Tiny 3 foot seedlings that will take another 300 years to grow, establish intricate root structures/habitats and be washed away in the next flood cycle?

Or at least >25ft substantial trees that can more quickly take hold?

I had an Oak tree cut down by accident in my yard in Florida, it took 2 months to find not even a nearly equivalent tree half its size to attempt to replace the benefit in shade, water management, etc. I probably won't be around when it grows to the same height as the 30+ year tree that was accidentally removed.

How many trees were sacrificed for this project thus far?

How many are anticipated to be further possibly sacrificed and how might that be better avoided?

Mangroves along Florida coastline are far better anti-erosion, storm surge protection than concrete walls, many places in Florida are now learning the hard way.

What is or will be the filtration/mitigation for pesticide run off from the Golf Course and surface streets? Bioswales are key to natural purification, how are they factored into this biosterilization planning?

I find myself in an ironically unenviable position of commenting on inadequate, sensible natural solutions included as part of this plan as well as in Florida.

For example, the idea of "replanting" the Elder berry bushes (that were planted in recent times by another funded project) to mitigate impact on Longhorn Beetles is such a simplistic approach to the biologically complex reality of this ecosystem. Some of the mitigating sites being considered will adversely impact threatened waterfowl's protected nesting. The Beetles and bushes LIKE being near the river's edge for Mother Nature's Order and reason, **I believe project neutral biologists should have the opportunity of more time to weigh in further upon this** and potential less adverse mutually agreeable strategies be considered.

This is an ancient, intricate thriving ecosystem that we are yet still learning from, still recovering from the avaricious gold rush decimating ravages that spawned the growth of our region. We must continue to heal as we protect.


We paradoxically now all better pray for a relatively moist, but not inundating winter season. We all desire future thriving of a safe, environmentally healthy and protected ARP, we must work together to achieve visionary goals for long term benefit for all.

I wish you a happy holiday, and thank you for your service and any assistance you can provide to clarify these initial and anticipated subsequent comments and concerns.

Since we were given little time over the holiday periods to review and respond, hopefully

you will be working this holiday as well to optimize communication efforts.

Cordially,
Lisa Merritt MD
Exec Director, MHI.



Multicultural Health Institute
1781 Dr. Martin Luther King Way,
Sarasota, Florida 34234
Office: 941-706-3362 | Fax: 941-225-8198
www.the-MHI.org | Facebook

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Sarasota Community Action COVID

Dashboard: <https://resiliencesystem.org/dashboards/sarasota-county/>


Multicultural Health Institute
1781 Dr. Martin Luther King Way,
Sarasota, Florida 34234
Office: 941-706-3362 | Fax: 941-225-8198
www.the-MHI.org | Facebook

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From: [ARCF_SEIS](#)
To: [PublicCommentARCF16@water.ca.gov](#); [Sutton, Drew](#)
Cc: [Dwyer, Keleigh](#); [J. CIV USARMY CESPK \(USA\)](#); [Martin, Nathaniel](#); [J. CIV USARMY CESPK \(USA\)](#); [ARCF_SEIS](#)
Subject: [EXT] FW: Comments on December 2023 SEIR for American River Common Features Work
Date: Tuesday, January 2, 2024 2:50:15 PM

From: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Sent: Tuesday, January 2, 2024 1:06 PM
To: [ARCF_SEIS](#) <ARCF_SEIS@usace.army.mil>
Subject: FW: Comments on December 2023 SEIR for American River Common Features Work

Gentleman has some concerns about ARCF work, tree removal, etc.

From: [SPK-PAO SPK](#) <SPK-PAO@usace.army.mil>
Sent: Tuesday, January 2, 2024 12:45 PM
To: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Subject: FW: Comments on December 2023 SEIR for American River Common Features Work

Good afternoon, Paul.

I believe that the email below is for you. Please let me know if I should forward it elsewhere.

Sincerely,

Therese "Mera" Lafferty
Administrative Support Assistant
Sacramento District, USACE
Public Affairs Office
SPK-PAO@usace.army.mil
916-557-5100

From: Bill Brattain <bbrattain@hotmail.com>
Sent: Sunday, December 31, 2023 12:19 PM
To: [SPK-PAO SPK](#) <SPK-PAO@usace.army.mil>
Cc: Kelvin.Lum@mail.house.gov; RichDesmond@saccounty.gov; Pat-Hume@saccounty.gov; BellaSF@saccounty.gov; Susan_Rosebrough@nps.gov; SorgenKC@saccounty.gov; AmRivTrees@gmail.com; barbaraleary@comcast.net; AndySawyer@aol.com
Subject: [Non-DoD Source] Comments on December 2023 SEIR for American River Common Features Work

Dear Army Corps:

My name is William Brattain, P. E., and I am a resident near the proposed work along the American River. I am a California-licensed civil engineer and am a retired former Water Resource Control Engineer who worked for the California Central Valley Water Board for 25 years. I am submitting comments on the above-reference document and particularly the work proposed just north of the Larchmont Community Park. This is the area referenced as Contract 3B South and 4B.

1 Like many of the residents in this area, I am very concerned about the removal of large heritage oak trees and other habitat along the levee so that rock/riprap can be placed. These trees already provide erosion protection along the levee, and I have personally observed water rising up to the levee at this location during the floods of 1997. At that time, the flow rates along the levee area were nearly stagnant and the higher flow was out toward the center of the river channel well away from the levee. These high flows occur very infrequently, are of short duration, and will be less frequent with the new spillway at Folsom Dam. The proposal to remove the trees here and replace them with rock is completely unacceptable and unnecessary and would destroy habitat, scenic beauty, and 150-year-old oak trees that are not impacting the levee, but are in fact protecting them.

2 The proposal to place rock along the riverbank at this location is also unacceptable because that area has been and is used by the public for fishing and swimming and wading with dogs and there would no longer be safe access to the water if there is large riprap placed along the shoreline there. This area is part of the natural river channel and the minor erosion that is occurring is moving very slowly and impeded significantly by the heavy vegetation that is currently at this location. There is a nice beach that would no longer be able to be used if riprap is placed here. Furthermore, the erosion at this location is several hundred feet from the levee and is not threatening it in any way.

I urge the Army Corps to reconsider the work on the south side of the American river at this particular location. The entire American River Parkway is a beautiful scenic area that is heavily used by the public and by wildlife that would be severely degraded by the proposed work, much of which is totally unnecessary to protect the levees.

3 Attached is a screenshot of the area I am concerned about circled in red. If the work in this area could be modified such that the trees are not removed, and riprap is not placed along the shoreline making the water inaccessible, the project would be much more palatable. The proposed work will destroy habitat, ruin the scenic parkway, create hazards for tripping and attracting rattle snakes, and prevent access to the water for recreation.

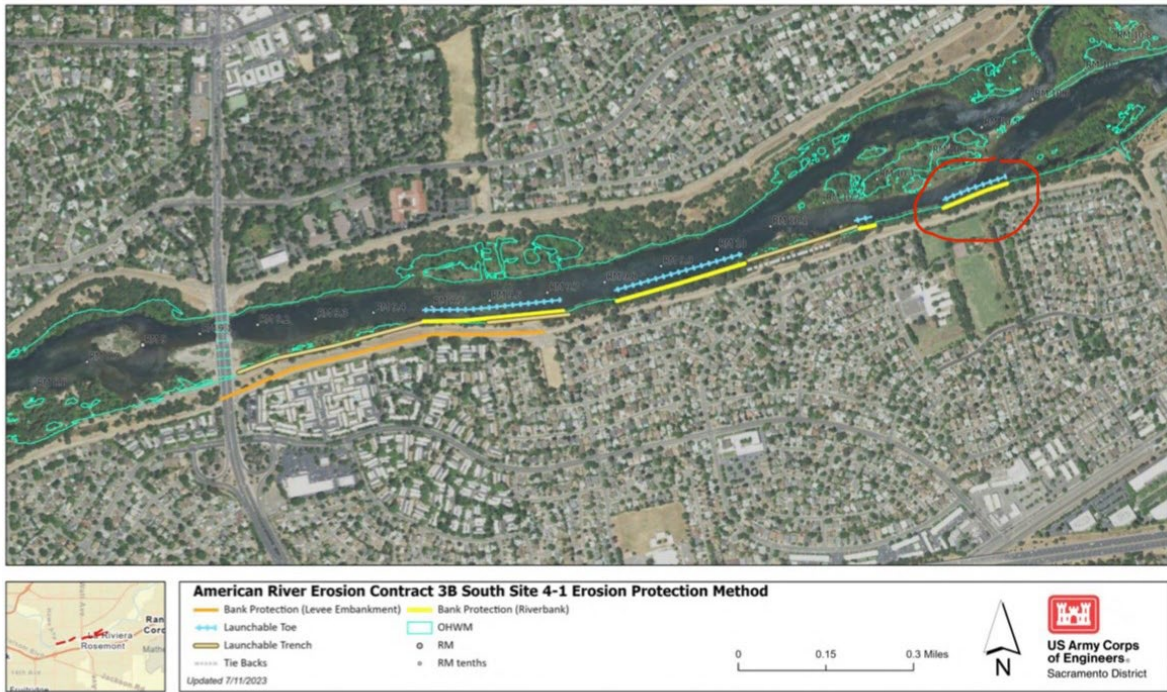


Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details

Thank you,

William Brattain, P.E.
9345 Sparks Way
Sacramento, CA 95827

From: [ARCF SEIS](#)
To: [Sutton, Drew](#); [DWR Public Comment ARCF 16](#)
Subject: [EXT] FW: [Non-DoD Source] American River levy improvements
Date: Tuesday, January 2, 2024 2:56:17 PM

From: Cyndi Spencer <cyndispencer13@gmail.com>
Sent: Friday, December 29, 2023 11:47 AM
To: SPK-PAO SPK <SPK-PAO@usace.army.mil>
Subject: [Non-DoD Source] American River levy improvements

Hello

I am writing to request information regarding the improvement work that is going on at the American River.

I am a resident of the upper parkway, and have observed the destruction that came with the work down the river, in the vicinity of River Park and Sacramento State. I quite honestly can't believe this work was done with such disregard for the environment and the wildlife, let alone the people who use the river. The area that has been worked on looks like a bomb went off on it. I have to believe that there is a way to improve the levy without so much destruction and disregard for the environment.

First of all, I'd like to request that the Army Corps halts this project. As a resident with property that backs up to the levy, I can't imagine living through what you propose. I have seen the proposal, and comparing that to what I witnessed on the first phase of this, this project clearly needs more thought.

Barring that, I'd like to request all information pertaining to CEQA and NEPA compliance for this project. Given the significant environmental impact, and the utter demolition of all the habitat so far, I have a hard time believing this project adheres to CEQA and NEPA mandates.

1

I'd like to request all publicly available information regarding how this project intends to comply with environmental regulations.

Thank you,

Cyndi Lopez-Spencer

From: [DWR Public Comment ARCF 16](#)
To: [Sutton, Drew](#); [Martin, Nathaniel J SPK](#); [Duey, Keleigh L CIV USARMY CESPK \(USA\)](#); [Romine, Guy K SPK](#)
Subject: [EXT] FW: Levee project proposed project
Date: Wednesday, January 3, 2024 10:20:21 AM

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

From: Maryann Frantz <mfs4747@yahoo.com>
Sent: Tuesday, January 2, 2024 11:08 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Levee project proposed project

[You don't often get email from mfs4747@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

1 | This project will cause biological desecration to habitat. I want to see the data and reasons we need to do extensive levee work / if it is not in danger why start ripping up what appears functional? This will also be an eyesore like current changes down pass sac state no!
Sent from my iPhone

From: [ARCF_SEIS](#)
To: [Sutton, Drew](#)
Subject: [EXT] FW: [Non-DoD Source] Proposed levee work by corps Eng.
Date: Wednesday, January 3, 2024 7:19:42 AM

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

From: Maryann Frantz <mfs4747@yahoo.com>
Sent: Tuesday, January 2, 2024 8:48 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Proposed levee work by corps Eng.

1 I am a bird watcher walking levee between Howe & Ross for years. I have not seen evidence of any levee problems, the river in storms reshapes itself from year to year but I don't want the corp. to uproot trees that are just recovering from giant storm & draugh, bird habitat & rob the community of the one place we love I want to see proof that we need a massive project and not some smaller changes that are shown to be prolamatic. I am a biologist, former teacher & resident of butterfield way , Maryann frantz
Sent from my iPhone

From: angie marin
To: Woertink, Amber@CVFPB
Cc: Lief, Chris@CVFPB
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 2, 2024 7:52:09 PM

Some people who received this message don't often get email from ahmarin105@gmail.com. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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

2 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.

3 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!

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

Thank you. Angie Marin

From: [Jaime Becker](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 3, 2024 1:31:57 PM

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Dear Jane Dolan and Chris Lief:

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

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.

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Thank you.

Sincerely,

Jaime Becker
Coldwell Banker
jaime@jaimesells.com
916-715-7454
DRE# 01737783

From: etak123@aol.com
To: Woertink, Amber@CVFPB
Cc: Lief, Chris@CVFPB
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Friday, December 29, 2023 5:52:57 PM

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Thank you.

Kate Rosenlieb
9246 Linda Rio Drive
Sacramento, CA

From: [Annette Faurote](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Friday, December 29, 2023 1:52:58 PM

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Dear Jane Dolan and Chris Lief:

I moved to Sierra Oaks 1 1/2 years ago because I LOVE and NEED the lovely American River Parkway with its healthy riparian ecosystem. I've watched the area around Sac State to Howe ruined by the Army Corps. I am sure a targeted and much less destructive method could be used. My house is one that is being "protected" by this devastation. Please search out a gentler approach as one the National Park Service utilizes !

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.

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Thank you,
A Faurote
2010 University Park Dr
Sacramento

Sent from my iPhone

From: [Maury Wiseman](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Friday, December 29, 2023 12:35:42 PM

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

Dear Jane Dolan and Chris Lief:

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

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Thank you.

From: [JESSICA EPPERSON](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Thursday, December 28, 2023 11:21:15 PM

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Dear Jane Dolan and Chris Lief:

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Thank you.

Sent from my iPhone

From: [Brown, Josh@DWR](mailto:Brown.Josh@DWR)
To: [Calles, Jennifer@CVFPB](mailto:Calles.Jennifer@CVFPB)
Cc: [Nguyen-Tan, Angela@CVFPB](mailto:Nguyen-Tan.Angela@CVFPB); [Sutton, Drew](mailto:Sutton.Drew)
Subject: [EXT] RE: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 3, 2024 1:59:59 PM

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

From: Jo <rocklily@comcast.net>
Sent: Sunday, December 17, 2023 1:20 PM
To: Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>
Cc: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: Please Insist on a Better USACE Proposal for American River 3B Project

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

Dear Jane Dolan and Chris Lief,

1 I am extremely distressed by the upcoming plans of the US Army Corps of Engineers (Contract 3B, extending east from Howe Ave) to bulldoze over 500 more trees on the American River Parkway for "bank erosion protection" they claim we "need", based on minimal, overgeneralized "data". I strongly question whether this work is necessary, and I believe the denuded, bare dirt methods are just as likely to put us at worse risk in high flows for decades to come. (We have yet to see how these bulldozed areas around Sac State actually fare in high flows). I strongly oppose the "brute force" bulldozing methods the Army Corps

2

proposes along 4 more miles of the Wild and Scenic American River. (This new project would bring the total damaged area to 11 miles of the lower 26 miles of Parkway). I object to the extreme destruction of trees (including 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 access, bird and wildlife watching, photography, etc.) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, 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, which is encouraged by the National Park Service), and the use of smaller equipment. Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn their Director answers to county, state, and federal officials when the Army Corps is involved. This new extension is NOT needed for flood safety and it would destroy a vital stretch of the Parkway. I urge you to help us 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.

Thank you.

--

Jo Dorais

.....Age and treachery will defeat youth and talent every time.

From: [ARCF SEIS](#)
To: [Sutton, Drew](#)
Cc: [ARCF SEIS](#); publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Please Insist on a Better USACE Proposal for American River 3B Project
Date: Thursday, January 4, 2024 10:26:06 AM

From: Jaime Becker <jaime@jaimesells.com>
Sent: Wednesday, January 3, 2024 4:01 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentsARCF16@water.ca.gov
Subject: [Non-DoD Source] Please Insist on a Better USACE Proposal for American River 3B Project

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

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

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

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

As you know, the American River is often called the "Crown Jewel of Sacramento". Please do not let our "jewel" be stolen from us!

Personally, and I know for many others, the river is my sanctuary. A place not only for health, but for spiritual and mental well being. Especially during 2020. As a result of 2020, many more have come to enjoy the parkway. Many more also work from home now and this would be an absolute nightmare with the noise, pollution and dust.

There has to be a better way and I am urging you to work towards a solution that mitigates the damage to the American River Parkway.

Sincerely,

Jaime Becker
Executive Associate
Coldwell Banker
jaime@jaimesells.com
SacramentoHomesByJaime.com
Cell: 916-715-7454
DRE# 01737783

Director of The Greater Arden Chamber of Commerce

Sacramento County Area Report
Placer County Area Report
Yolo County Area Report
El Dorado County Area Report

From: [DWR Public Comment ARCF 16](#)
To: [Sutton, Drew](#)
Cc: [Martin, Nathaniel J SPK](#); [Duey, Keleigh L CIV USARMY CESPK \(USA\)](#)
Subject: [EXT] FW: Protect riparian vegetation along the lower America River
Date: Thursday, January 4, 2024 11:17:32 AM

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>

Sent: Thursday, January 4, 2024 11:13 AM

To: Tai Moses <taimos@gmail.com>; DWR Public Comment ARCF 16
<PublicCommentARCF16@water.ca.gov>

Subject: RE: Protect riparian vegetation along the lower America River

Thank you for your interest in the American River Common Features 2016 Flood Risk Management Project.

The public comment period for the Draft American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (ARCF SEIS/SEIR) is now open.

Formal comments can be submitted in writing to ARCF_SEIS@usace.army.mil and PublicCommentARCF16@water.ca.gov from December 22, 2023 until February 5, 2024.

The joint NEPA/CEQA document is available to review here:

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/SEIS-SEIR/ARCF_Draft-SEIS-SEIR_Dec2023.pdf?ver=AO3ouyT-D15CF8wpXMACuQ%3d%3d

Appendices are here:

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/Documents/SEIS-SEIR/ARCF_Draft-SEIS-SEIR_Appendices_Dec2023.pdf?ver=wAW-K8qDfEA-7BU7xhcEnQ%3d%3d.

Answers to some frequently asked questions (FAQ) are available here:

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/Documents/ARCF%20-%20SEIS-SEIR%20FAQ%2012-19-2023.pdf?ver=GnppypM6lcs8yfHULgSAtg%3d%3d.

You may also be interested in the upcoming public meetings, which will be held January 10th and 16th. Please visit www.sacleveeupgrades.com for further details on how to access the meetings. Links are provided below.

PUBLIC MEETING INFORMATION

We will hold two virtual public meetings, one on Wednesday, January 10, 2024 and one on Tuesday, January 16, 2024 to present this document. Both public meetings are scheduled for **5:30 - 6:30 p.m.**

Please use the following Webex links to attend the meetings. *If you don't have a Webex account, you can still attend by signing in as a guest.

[Webex Link for Jan. 10, 2024](#)

To join by phone: 1-844-800-2712 (U.S. Toll Free) When asked, enter access code: 2763 131 8567 #

[Webex Link for Jan. 16, 2024](#)

To join by phone: 1-844-800-2712 (U.S. Toll Free) When asked, enter access code

From: Tai Moses <tamos@gmail.com>

Sent: Thursday, January 4, 2024 11:05 AM

To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>

Subject: Protect riparian vegetation along the lower America River

You don't often get email from tamos@gmail.com. _____

1

I was deeply shocked to read of the US Army Corp of Engineers' plan to bulldoze over 500 trees on the American River Parkway for "bank erosion protection." This outdated and destructive method of flood control will leave bare dirt banks and destroy valuable wildlife habitat for years to come.

2

We have seen the disastrous effects of this kind of "erosion control" along the [San Lorenzo River in Santa Cruz](#). Bulldozing mature trees and established vegetation has destroyed a once-beautiful riparian corridor, erasing bird and wildlife habitat, raising the water temperature and making it less hospitable to fish, and creating an ugly, sterile landscape that no one enjoys looking at.

Here, in the midst of the city, beavers and river otters have returned to the American River! Removing riparian vegetation endangers their homes and their food supply.

I oppose this project and I urge you USACE to perform a more targeted, less destructive and more modern approach to erosion control projects 3B and 4.

Sincerely,

Tai Moses
1548 50th Street
Sacramento, CA 95819

From: [ARCF SEIS](#)
To: [Sutton, Drew](#); publiccommentARCF16@water.ca.gov
Cc: [ARCF SEIS](#)
Subject: [EXT] FW: [Non-DoD Source] Common Features EIS/EIR - American River Mitigation Site
Date: Friday, January 5, 2024 9:37:19 AM

From: Robert Horowitz <horowitzenv@gmail.com>
Sent: Thursday, January 4, 2024 8:25 PM
To: PublicCommentsARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Common Features EIS/EIR - American River Mitigation Site

Thank you for the opportunity to comment on the project. In general, I am supportive of all efforts to strengthen levees, and have watched the ongoing work with gratitude and some awe.

1 Regarding the plans for the 120-acre mitigation site (ARMS) on the former Urrutia gravel mine site, I request USACE to fully engage with Sacramento County Regional Parks and the recreation community, specifically the biking community, to consider recreation imperatives when designing this site. What we have found, consistently, over the past 20 years is that areas in the lower Parkway which are isolated and do not have good public access quickly become overrun with encampments, sometimes deep in the brush, and that the resource damage from these encampments far outstrips any damage from the occasional stray bike tire or careless picnickers. Fences in remote areas are quickly breached as folks search for a safe place to sleep. Once a place feels unsafe to the average law-abiding user, few people visit, leading to a cycle of environmental destruction and public apathy. The only real antidote to that is active recreational use.

2 What the lower Parkway desperately needs is a well designed multi-use trail network stretching from Discovery Park to the upper end of Cal Expo. The Discovery East area--including this property--is a missing link in this effort. We already have a off-road cycling program which covers maintenance and emergency roadways in Woodlake and Cal Expo. We already have Camp Pollock next door to the ARMS, run by the Sacramento Valley Conservancy. On the books and awaiting construction is the Woodlake Gateway, which will bring needed upgrades at mile 3. A few well placed trails, including a bridge over the mouth of the riverbank cut, could be a wonderful addition to this project and really don't take much away from mitigation (the roads exist). Well-planned trails will bring managed active recreation to the site and a large user group who can be leveraged.

3

When I was a member of the Parkway Plan Citizens update committee in 2004-5, future uses for the pond were discussed, but it was so far off in the future so not much was planned. Sacramento County Regional Parks is the Parkway manager, and any plans you make will need approval from the Board of Supervisors. Sac Valley Conservancy and the American River Parkway Foundation should all be involved in planning, as well as cycling groups like the Sacramento Area Bicycle Advocates (SABA) and the Folsom Auburn Trail Riders Action Coalition (FATRAC).

Thank you for your time and consideration. If I can assist you in any way with reaching out to the cycling community please do not hesitate to ask.

Robert Horowitz
City of Sacramento resident
cyclist
parkway advocate
916-501-3959

From: [ARCF SEIS](#)
To: [Sutton, Drew](#)
Cc: publiccommentARCF16@water.ca.gov; [ARCF SEIS](#)
Subject: [EXT] FW: [Non-DoD Source] USACE Proposal for American River 3B Project
Date: Friday, January 5, 2024 9:41:07 AM

From: Elizabeth Smith <rocklvr@gmail.com>
Sent: Friday, January 5, 2024 5:57 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] USACE Proposal for American River 3B Project

1 | Good morning, I will keep this short because I'm sure you know all the arguments against removing around 500 trees from the river's edge. I just wanted to make an official public comment that I oppose their removal. Perhaps a more targeted removal in key areas would still satisfy the Army Corps concerns of the tree's impacts on the levee. But removing all of them would weaken the levee (at least in the short term) as well as devastate the ecosystem of the river.

I'll leave it at that and I hope you have a lovely day. Happy New Year! :)

Sincerely,
Elizabeth Smith
Sacramento resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 4:42 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Bryan Mahoney <mahoneybryanm@gmail.com>
Sent: Wednesday, January 10, 2024 4:09 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you,

Bryan Mahoney
(510) 295-9274

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 3:59 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Please Help Insist on a Better USACE Proposal for American River 3B Project

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

From: Avery, William E <averyw@csus.edu>
Sent: Wednesday, January 10, 2024 3:56 PM
To: Stork, Roland <rstork@friendsoftheriver.org>
Cc: wrcwatson@yahoo.com
Subject: [Non-DoD Source] Please Help Insist on a Better USACE Proposal for American River 3B Project

Dear Ron Stork and Chuck Watson:

1 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 the stream bank Erosion Control subcomponents of reach 4 Of Contract 3B.

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

This new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the of the lower 26 miles of Parkway!. I object to the extreme destruction of trees (including potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river's edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that is vital to sustain our astonishing urban wildlife (otters, owls, beavers, bald eagles, deer, migratory birds, and more) valued by recreational Parkway users. If erosion "spot fixes"

are needed at some locations, then less destructive alternative methods should be used (such as in-place use of stabilizing vegetation, and bio-technical techniques, encouraged by the National Park Service), and the use of smaller equipment.

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

As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

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

3 | Let’s ask for a pause on the stream bank subcomponents of this contract and revisit these proposed work sites with new surveys and use the updated flow models, take into account the different stream bank materials and vegetative armoring already present and protecting the banks, the Pleistocene Fair Oaks formation as one example, and suggest focussed, more habitat protective biotechnical erosion control.

I’d love to volunteer to be on any new bank surveys!

Thank you.

William Avery
Professor Emeritus, BIOLOGICAL SCIENCES CSUS

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 3:31 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Bonnie Domeny <bonnie@threadlove.com>
Sent: Wednesday, January 10, 2024 3:25 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Bonnie Domeny

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 2:27 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Josh Thomas <joshjhthomas@gmail.com>
Sent: Wednesday, January 10, 2024 2:26 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.
Joshua Thomas

January 9, 2024

SUBJECT: EXTENSION OF COMMENT PERIOD FOR (SEIS/SEIR) EROSION PROTECTION MEASURES (CONTRACT 3B)

Dear Project Manager,

1 I am writing to request an extension of an additional 30 days to review and submit public comments on the SEIS/SEIR for erosion protection measures (Contract 3B), owing to the importance of the project's Purpose and Need, the depth and complexity of the proposed Project Description and the public concern regarding potential environmental impacts and the proposed mitigation.

It is my impression that the ACOE strives to afford the public adequate time to read and adequately understand this technical document so as to submit well-thought out public comments.

2 Toward that end, along with the informational ZOOM meetings, there is the need for a similar series of what for some are more effective in-person meetings that enable interaction, with the opportunity to ask questions and get clarity where needed. The meeting could be in the format of poster boards tended to by knowledgeable staff.

Thank you for your consideration.

Sincerely,

Kelly O. Cohen
9495 Mira del Rio Drive
Sacramento, CA 95827

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 12:18 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Contract 3B American River Parkway

From: Laura Langham <laurielangham@sbcglobal.net>
Sent: Wednesday, January 10, 2024 12:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Contract 3B American River Parkway

1 | I am writing in support of the Sacramento County Regional Parks request to you, the Army Corps of Engineers for more time to **ADEQUATELY** review the draft SEIS/SEIR for Contract 3B “erosion protection measures”, and extension of the comment period, due to the significant effects expected to occur within the Parkway. I live directly adjacent to this area and it is a major concern.

Regards,
Laurie Langham
laurielangham@sbcglobal.net

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 11:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Rebecca Jagers <rebeccajagersart@gmail.com>
Sent: Wednesday, January 10, 2024 11:47 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Wednesday, January 10, 2024 11:46 AM
To: Bailey.Hunter@usace.army.mil; Sutton, Drew
Subject: [EXT] RE: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 11:37 AM
To: Sutton, Drew <dsutton@geiconsultants.com>; DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Cc: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

[You don't often get email from arcf_seis@usace.army.mil. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Hey Drew,

Here is another comment.

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

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

From: Sara E Denzler <sdenzler@me.com>
Sent: Wednesday, January 10, 2024 11:17 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 11:38 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source]

From: john&terry atkinson <tlcjba@comcast.net>
Sent: Wednesday, January 10, 2024 11:26 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source]

1 Would like to be more involved in plans for erosion control along lower American river. Need to learn more about plans for soil disturbances and migration.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 10:45 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Additional Comments on SEIR for Lower American River Erosion Work

From: Bill Brattain <bbrattain@hotmail.com>
Sent: Wednesday, January 10, 2024 10:34 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Kelvin.Lum@mail.house.gov; RichDesmond@saccounty.gov; Pat-Hume@saccounty.gov; BellasE@saccounty.gov; Susan_Rosebrough@nps.gov; SorgenKC@saccounty.gov; AmRivTrees@gmail.com
Subject: [Non-DoD Source] Additional Comments on SEIR for Lower American River Erosion Work

Dear Army Corps & DWR,

My name is William Brattain, P.E. and I am submitting these additional comments on the above-referenced project to supplement my previous comments regarding the planned removal of the large heritage oak trees north of the Larchmont Community Park at American River Mile 10.5, Contract 3B, Site 4-1. In my previous comments, I focused on the predicted flow velocity of the water near the levee being nearly stagnant under the 1 and 200 year flow event and not being a threat for erosion. These additional comments focus on the distance of specific trees from the base of the levee. In particular, the two largest and oldest heritage oaks at this location.

The two trees I am focusing on in these comments are located approximately 27 feet from the base of the levee where it meets the riverbank. It is not clear if these two trees are among those planned for removal given they are not within the 21 foot footprint of the planned trenched in rock. However, I cannot assume that they won't be removed anyway even though they are the two highest value trees for this entire project given their age. The SEIR states that high value trees will be preserved when possible, but there is no mention of specific high value trees that will be saved.

1 I have included several attached photographs that show the trees in question and that they are greater than 21 feet from the base of the levee. The tape measure in this picture is fully extended to its 25 foot length and there is still additional distance to the base of the levee. If the Army Corps is determined to install this unnecessary rock trench to prevent erosion from water that isn't moving and has a return period of 1 in 200 years, they should at least save the trees that are not within the 21 foot with of the rock entrenchment, especially when they are high-value heritage oaks that are up to 350 years old.

Thank you,

William Brattain, P.E.

9345 Sparks Way

Sacramento, CA

List of Attachments:

Project location circled in red

Rock trench cross section

Site 4-1 rock trench width, 21 feet

Large heritage oak immediately north of the park

Distance from levee approximately 27 feet

Large heritage oak northeast of the park

Distance from levee also approximately 27 feet



American River Erosion Contract 3B South Site 4-1 Erosion Pro

- Bank Protection (Levee Embankment)
- Bank Protection (Riverbank)
- Launchable Toe
- Launchable Trench
- Tie Backs
- OCHWM
- RM
- RM tenths

Updated 7/11/2023

Figure 3.5.2-9. American River Erosion Contract 3B South Site 4-1 Details

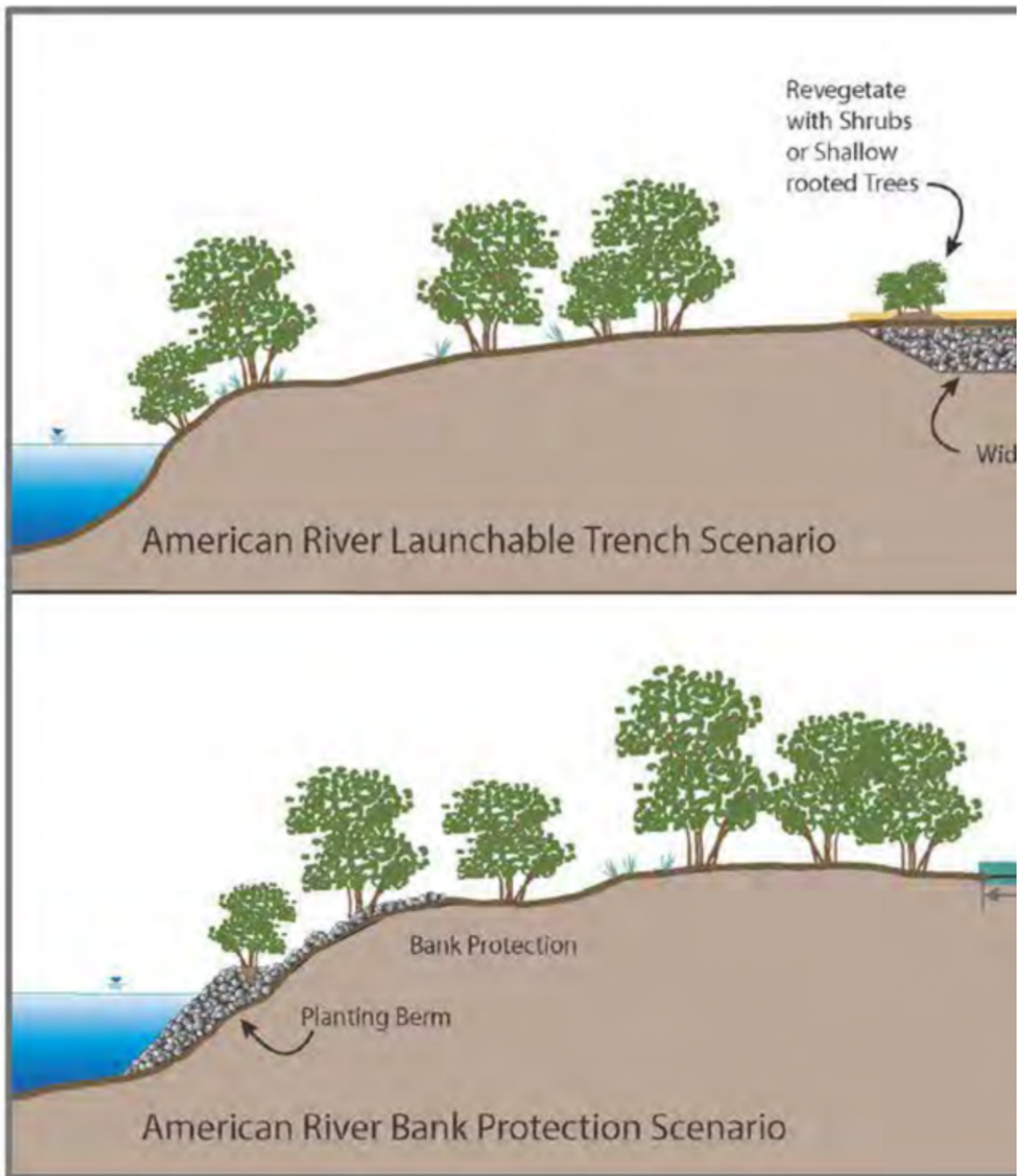


Figure 3.5.2-2. Launchable Trench and Bank Protection Designs

American River Erosion Contract 3B South

Site 4-1

Site 4-1 levee work would be conducted on the left bank from RM 9.1 to RM 10.5 (Figure 3.5.2-10). As with Sites 3-1 and 3-2, launchable trenches would be buried to allow site revegetation.

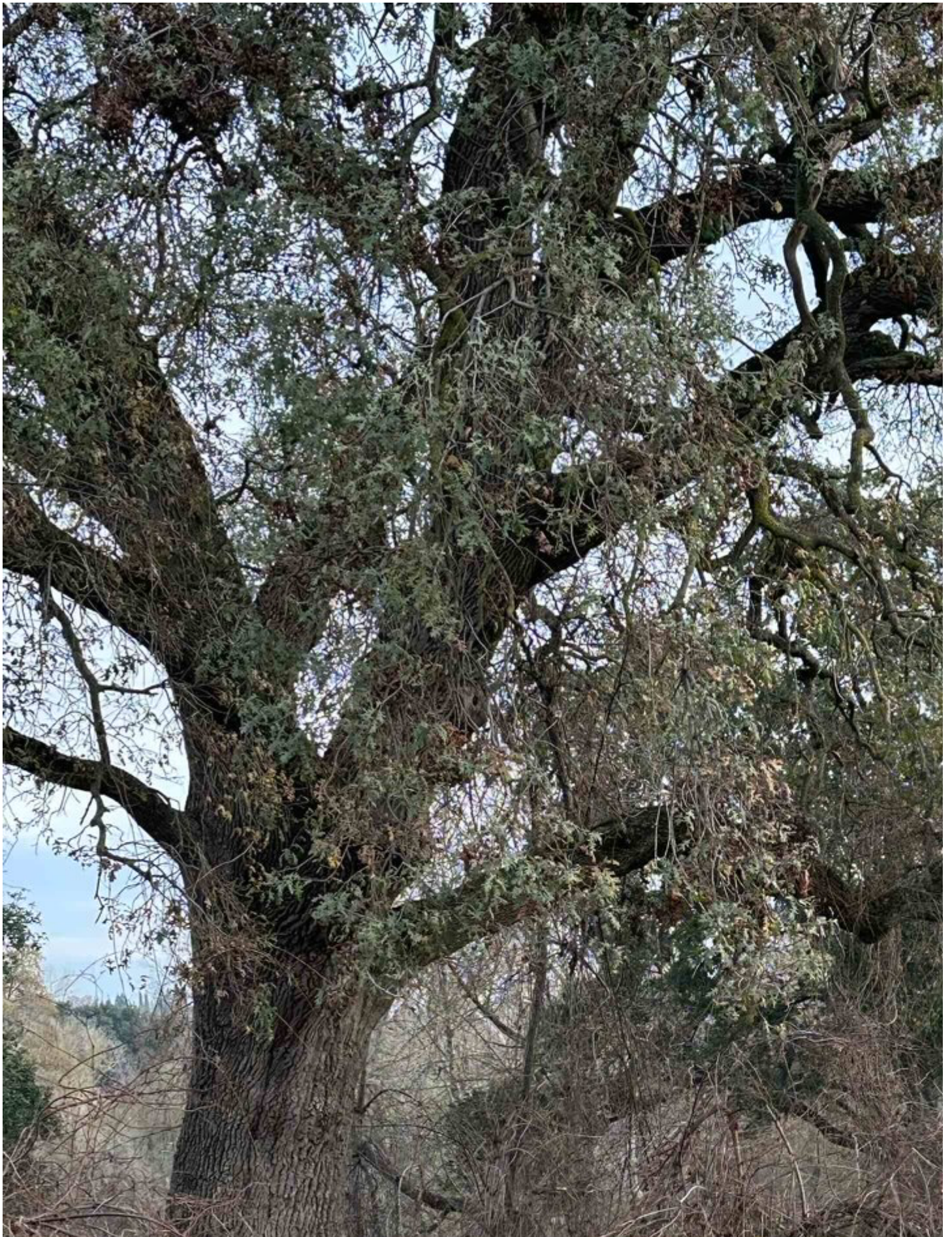
The description of launchable rock toe under Site 3-1 also applies to Site 4-1. Tie backs higher up on the bench outside the launchable trench provide erosion protection. These tie backs are built up of revetment plantings. The tiebacks are approximately 21 feet across, and the tip of the trench is at the existing grade of the levee overbank. They are built so as to minimize the transition in between different types of erosion protection. At Site 4-1 where there is a launchable toe at the edge of the planting (Figure 3.5.2-9), unlike the typical launchable toe at Site 3-1 where the launchable toe is at the edge of the planting, this erosion protection feature is covered in soil to allow for revegetation.

The design of the erosion protection features, specifically the launchable trench, revetment, and buried launchable trench allows for the mitigation for riparian habitat and salmonid habitat. The excavation, ramps, tree removal, and use of excavated material are also part of the design to Site 4-1 as well. Erosion protection has been designed for the outfall.

American River Erosion Contract 4B









From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 10:37 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Contract 3B

From: Virginia Volk-Anderson <vanderv@surewest.net>
Sent: Tuesday, January 9, 2024 10:43 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Contract 3B

1 | I am writing in support of County Regional Park's request for an extension of the comment period to allow for an adequate review of the SEIS/SEIR due to the significant effects expected to occur within the Parkway.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 10:35 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] I support Sac Co Regional Parks request and also personally request that ACOE please extend comment period re: Public Meeting regarding American River Common Features Supplemental Environmental Impact Statement/Subsequent Env...

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

From: Lisa Phenix <lisap@winfirst.com>
Sent: Tuesday, January 9, 2024 12:28 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] I support Sac Co Regional Parks request and also personally request that ACOE please extend comment period re: Public Meeting regarding American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental...

Dear Sirs:

1 | I live near the American River Parkway. I am deeply concerned about the impact of the above ACOE project as it
2 | relates to the Parkway. The ACOE's work so far along the river left the area barren. The upcoming 3B contract envisions
similar destruction. There has got to be a way to improve the levees, reduce the risk of flooding and maintain the
integrity of plants, trees, wildlife, visual and recreational goals of the American River Parkway. I support Sacramento
County Regional Park's request to extend the comment period on this matter. I personally also so request that the
comment period be extended and that less damaging to nature considerations be reviewed, implemented, etc. Thank
you in advance for your careful consideration of these concerns and for support of our mutual goal to reduce flooding
and maintain the crown jewel, of our area, the Wild and Scenic Lower American River and the American River Parkway.
Sincerely, Lisa Phenix, Sac Co resident.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 9:18 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Extend Public Commentary Period- Contract 3B

From: Erik Finnerty <erik@fatcatscones.com>
Sent: Wednesday, January 10, 2024 9:15 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Extend Public Commentary Period- Contract 3B

As a 50 year resident of Sacramento, I can attest that the crown jewel of our city is the American River Parkway. And we have to do anything and everything to preserve that.

The recent Army Corp erosion work on H Street near Sac State is an affront to anyone that enjoys the river. I certainly understand the importance of managing the area and addressing erosion. But the river in that area is now a wasteland. It looks horrible... and certainly is nowhere near the natural state of the river parkway system. How did this possibly get approved originally??

- 1 | Expanding this horrific monstrosity with Contract 3B all the way past Watt Avenue to Estates Avenue area is a travesty... this will GREATLY diminish the natural beauty of the parkway. Furthermore, one questions the validity and approval process of this work. How on earth could planners get this rolling without adequate public meetings/ commentary/ involvement??
- 2 | PLEASE DO NOT LET THIS HAPPEN. **Please extend the Public Commentary period per the County Regional Park's request, given the significant impact this will have on our beautiful parkway.** DO NOT RUIN the American River Parkway. It is truly the greatest thing that Sacramento has to offer its citizenry BY FAR!!

Thank you for your consideration.

Erik Finnerty
CEO & Founder
Fat Cat Bakery
8130 Berry Avenue, Suite 100

Sacramento, CA 95828
P: 916.372.6464
F: 916.372.5546
E: erik@FatCatScones.com
W: www.FatCatBakery.com

Fat Cat Bakery- Real Food, Pure Ingredients, Made Simply. Please visit our YouTube channel for more information!

<https://www.youtube.com/watch?v=N6QkbVjSBqk&feature=youtu.be>

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 9:01 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Requesting extension for comment

From: sylgem@aol.com <sylgem@aol.com>
Sent: Wednesday, January 10, 2024 8:03 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Requesting extension for comment

1 | The 45-day period for written public comments ends on February 5th. I'm in support of County Regional Park's request for an extension of the comment period due to the significant effects expected to occur within the Parkway.
Sylvia Pritchett, 8824 Sawtelle Way, Sacramento 95826
[Sent from AOL on Android](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 9:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Time Extension Request for Review of ARCF SEIS/SEIR

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

From: Leo Winternitz <lwintern@comcast.net>
Sent: Tuesday, January 9, 2024 6:31 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PUBLICCOMMENTSARCF16@WATER.CA.GOV
Cc: Bellas Liz <bellase@saccounty.gov>; KC Sorgen <sorgenkc@saccounty.gov>; Betsy Weiland <flweiland@yahoo.com>
Subject: [Non-DoD Source] Time Extension Request for Review of ARCF SEIS/SEIR

Ladies and Gentlemen,

The draft SEIS/SEIR was released for a 45 day public review on Friday, December 22, 2023. The document was released at the start of the traditional year-end holiday season causing the practical review period to be significantly reduced.

1 | As this is an extensive and important document that will substantially affect the quality of life and the environment of the area's residents, I respectfully request that the review period be extended by 30 days to March 5, 2024.

Thank you,
Leo Winternitz
1430 Gary Way, Carmichael 95608

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 8:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Erosion Protection Measures on the American River

From: JAMES/BETTY COOPER <bettycooper@comcast.net>
Sent: Tuesday, January 9, 2024 4:50 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Erosion Protection Measures on the American River

To whom it may concern,

1 | I am sending this email to strongly support of County Regional Park's request for an extension of the comment period on this project due to the extreme impacts it will have on the Parkway, considered to be the gem of Sacramento.

2 | How is the drastic removal of trees and other plants "erosion control"? Why is this necessary for flood protection in view of recent raised levees and improvement to Folsom Dam?

I believe it is critical that the comment time period be extended to consider these and additional questions.

Thank you,
Betty Cooper

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 8:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Larry Carr <carr66@gmail.com>
Sent: Tuesday, January 9, 2024 4:35 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Larry Carr

Geologist/GIS Analyst

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 10, 2024 8:52 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Please extend 3B comment period

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

From: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Sent: Tuesday, January 9, 2024 4:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: [Non-DoD Source] Please extend 3B comment period

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

From: Chris Enright <cnuchris@yahoo.com>
Sent: Tuesday, January 9, 2024 3:21 PM
To: SPK-PAO SPK <SPK-PAO@usace.army.mil>
Subject: [Non-DoD Source] Please extend 3B comment period

Hello,

1 | Erosion control measures are necessary but the proposed solution appears to be a radically bad fit for the lower American River. This complex problem requires that the public be allowed to become aware of and comment helpfully on the proposed project. Please extend the comment period.

Thank you.

Chris Enright

~~~~~

Chris Enright

cnuchris@yahoo.com

916-524-6051

ChrisEnrightFineWoodworking.com



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 2:38 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Avery, William E <averyw@csus.edu>  
Sent: Tuesday, January 9, 2024 2:36 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov; Avery, William E <averyw@csus.edu>  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

To Whom it May Concern:

URGENT! I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF).

1 The timing of the release of the SEIS/SEIR for public comment over the holidays is inauspicious, the numbers of subcomponent projects, MCP, 3A, 3B, 4A, 4B, Piezometer Network, and two big mitigation sites is unprecedented. The documentation appears to be missing some important components such as supporting data, key references and essential footprint figures!

Please give us more time for a thorough review of this complex and extensive set of documents and proposed projects.

It is vitally important to have an extension of the comment period especially because of the significant effects expected to occur within the Wild and Scenic American River Parkway, the "Crown Jewel of Sacramento".

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

Thank you.

William Avery  
Professor Emeritus  
CSUS

Sent from my iPad

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 2:33 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Clyde Nunn <goldhill37@att.net>  
Sent: Tuesday, January 9, 2024 1:50 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.  
Clyde E Nunn

Sent from my iPad

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 2:28 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] Contract 3B

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**From:** Pete Connelly <pconnelly816@gmail.com>  
**Sent:** Tuesday, January 9, 2024 1:22 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] Contract 3B

1 The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain. USACE plans  
to remove possibly 500 trees on the American River Parkway for “bank erosion protection”. The claim that this  
protection is “needed” is based on minimal, overgeneralized “data”. Because the 45-day comment period began during  
the holiday season, and given the immense project related activities and associated negative environmental impacts, I  
2 strongly urge the USACE to extend the comment period by another 10-15 days to give the public sufficient time to  
evaluate the project. It is the opinion of many individuals that the work proposed for the areas east of Watt Avenue  
(upstream) is not necessary along this section of the American River.

Sincerely,  
Peter J Connelly Jr  
Applied Environmental Compliance  
916 524-4853

---

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

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

To USACE:

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

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

Sincerely,

Joseph O'Connor

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 2:21 PM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] Erosion Control Between Howe and Watt

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**From:** James Broderick <jamessellsinsurance@gmail.com>  
**Sent:** Tuesday, January 9, 2024 12:21 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] Erosion Control Between Howe and Watt

Hiya, ArmyCorps...

Would be helpful to see any news you can share about *re-planting* efforts in the newly-shorn area between River Park and Howe Avenue.

1 I see evidence of irrigation pipes, for instance. And a lot of straw matting which suggests something might be growing there, very soon.

And is it the case that mature trees will be eradicated everywhere they exist between the levees? Are areas with brambles and scrub in danger, too? Is it the Corp's intention to clear that entire section to a naked trench? Or are there acceptable levels of undergrowth and foliage that will soon return, and remain?

Reason I ask is: I take a lot of heat for *supporting* your work. I think flood control is a vital enterprise, and I'm willing to defer to experts who proposed this action to mitigate *risk*. I also believe the "clear-cut" look between River Park and Howe is a temporary thing, and that soon there will be landscaping and public amenities that restore the scene quite favorably.

If you want supporters like me to stand up for you, it would help to have some assurances that a green, verdant parkway will return when the work is done. I haven't seen discussion of that in any of your materials. And the scene from Tara O'Sullivan Bridge is not encouraging.

If the plan is to improve channels, mitigate erosion, and *restore* the landscape more judiciously, I'm for it. If the plan is to bulldoze a naked trench, and keep it that way... you'll lose me, too.

2 Show me some sketches. What's this going to look like five / ten years from now? That's how you'll advance the cause. What I've seen so far is bulldozers and dirt. That's a hard sell.

James Broderick

1569 48th Street  
Sacramento, CA 95819

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 2:18 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] Contract 3B

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**From:** Adele Kruger <kruger4283@yahoo.com>  
**Sent:** Tuesday, January 9, 2024 11:55 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] Contract 3B

- 1 | I strongly object to the continued destruction of the riparian habitat on the American River especially from Paradise  
2 | Beach up River the upcoming plan to extend these destructive activities to mile 11 must be reconsidered. This scorched  
Earth method should not be allowed. The Army Corps of Engineers should have a public meeting so that they  
understand the concern that we have for their plans to further degrade our beautiful River. Adele Krueger

[Yahoo Mail: Search, Organize, Conquer](#)



---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 9, 2024 10:04 AM  
**To:** Sutton, Drew  
**Cc:** Hunter, Bailey A CIV USARMY CESPCK (USA); Duey, Keleigh L CIV USARMY CESPCK (USA)  
**Subject:** [EXT] FW: [Non-DoD Source] American River Erosion Protection

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

From: Phyllis Ehlert <pehlert00@gmail.com>  
Sent: Tuesday, January 9, 2024 9:37 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Subject: [Non-DoD Source] American River Erosion Protection

- 1 Please honor the request of county park's administration for more time to review the Corps of Engineers proposal. There must be a less destructive and ugly solution.

Phyllis Ehlert

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Monday, January 8, 2024 3:28 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: Comments on December 2023 SEIR for Lower American River Erosion Work  
**Attachments:** IMG\_5836.jpeg; IMG\_2631.jpeg; IMG\_5863.jpeg; IMG\_2625.jpeg; IMG\_5861.jpeg; Video.mov

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**From:** Bill Brattain <bbrattain@hotmail.com>  
**Sent:** Monday, January 8, 2024 3:15 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov  
**Cc:** Kelvin.Lum@mail.house.gov; RichDesmond@saccounty.gov; Pat-Hume@saccounty.gov; BellasE@saccounty.gov; Susan\_Rosebrough@nps.gov; SorgenKC@saccounty.gov; AmRivTrees@gmail.com  
**Subject:** [Non-DoD Source] Comments on December 2023 SEIR for Lower American River Erosion Work

Dear Army Corps & DWR:

My name is William Brattain, P. E., and I am a resident near the proposed work along the American River. I am a California-licensed civil engineer and am a retired former Water Resource Control Engineer who worked for the California Central Valley Water Board for 25 years. I am submitting comments on the above-reference document and particularly the work proposed just north of the Larchmont Community Park. This is the area referenced as Contract 3B South at American River Mile 10.5. I am submitting comments again due to having accidentally sending them previously to the email for questions.

1 Like many of the residents in this area, I am very concerned about the removal of large heritage oak trees and other habitat along the levee so that rock/riprap can be trenched in, supposedly to protect the levee from erosion during a 1 in 200 year river flow event. These trees already provide erosion protection along the levee, and I personally observed water rising up to the levee at this location during the floods of 1997. At that time, the flow rates along the levee area were stagnant and the higher flow was out toward the center of the river channel well away from the levee. These high flows occur very infrequently, are of short duration, and will be less frequent with the new spillway at Folsom Dam. The proposal to remove the trees here and replace them with rock is completely unacceptable and unnecessary and would destroy habitat, scenic beauty, and several oak trees that are up to 350 years old that are not impacting the levee, but are in fact helping to protect it.

I have included several attachments below that show the location of the proposed work that I am concerned about, provide a river flow contour map of this section of the river under a 145,000 cubic feet per second (cfs) river flow, and

2 include a video that I took on February 10, 2017 when the river was flowing at 82,000 cfs. The river flow contour map shows that the flow velocity next to the levee is expected to be 0 feet/second which corresponds with what I observed in 1997 at this location. The video I took of this same location in 2017 also shows that the water was not moving near the shoreline over the river berm area. A flow velocity of 0 feet/second obviously could not cause erosion at or near the levee at this location. The infrequent nature and short duration of flows that could reach the levee should also be considered. Furthermore, the 2017 Lower American River Streambed Erosion Monitoring Report prepared for the American River Flood Control District states that for RM 10.5, erosion at the edge of the riverbank was not threatening the levee due to the width of the berm (which is approximately 150 feet and has dense vegetation).

I urge the Army Corps to reconsider work that involves the removal of these high-value heritage oaks on the south side of the American river at this particular location. The entire American River Parkway is a beautiful scenic area that is heavily used by the public and by wildlife that would be severely degraded by the proposed work, much of which is totally unnecessary to protect the levees. If the work in this area could be modified such that the trees are not removed, the project would be much more palatable. The proposed work will destroy habitat and ruin the scenic parkway.

Thank you,

William Brattain, P.E.  
9345 Sparks Way  
Sacramento, CA 95827

Attachments:

Work location circled in red  
Work location circled in yellow on velocity contour map  
Heritage Oak trees at RM 10.5  
Location of video at yellow X  
82,000 cfs flow on February 10, 2017  
Proof of date of video  
Video of flow at RM 10.5 on February 10, 2017

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Monday, January 8, 2024 1:07 PM  
**To:** Sutton, Drew; publiccommentARCF16@water.ca.gov  
**Cc:** ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] Better USACE Proposal for American River 3B Project , ISSUES WITH STAGING AREAS etc.

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**From:** Alan Dowling <alandowling1@gmail.com>  
**Sent:** Monday, January 8, 2024 1:04 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] Better USACE Proposal for American River 3B Project , ISSUES WITH STAGING AREAS etc.

Dear team,

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

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

There is a plan to have a **potential heavy equipment and perhaps materials staging area** mere feet from our residence adjacent to **Manlove pump station** just off Waterton Way; which creates large risks including but not limited to:

- air and noise pollution (our family is high risk health wise)
- risks to foundations etc. Has a geotechnical analysis been conducted and shared with local residents? We haven't been provided with anything
- significant impacts to wildlife etc

2 We request an approach which is lower risk with reduced impacts to local residents while utilizing **Watt Avenue** which is in close proximity.

Further, we 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. We 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. We do not support the USACE claim that this extension and the methods planned are “needed” for flood safety.

3

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! We 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 or damaged.

Thank you,

Alan James Dowling

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Monday, January 8, 2024 8:15 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] American River Common Features public comment

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**From:** Duane Campbell <campd22702@gmail.com>  
**Sent:** Saturday, January 6, 2024 1:57 PM  
**To:** PublicCommentsARCF16@water.ca.gov  
**Cc:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] American River Common Features public comment

Public comment.

I have read the project description on the web page ARCF of the proposed extension of flood control efforts on the American river near my home.

These proposals are poorly developed. If necessary, specific spot fixes could be used to shore up the levees in areas of need. A massive levee/flood plain destruction, similar to the one south of SAC State is not indicated as necessary nor particularly useful.

1 You have not demonstrated that the fixes proposed are needed.

Your design and your plans are inadequate. They should be reviewed by persons without a financial interest in promoting the project.

I walk along this area of the wild and scenic river almost everyday. Your proposals are inadequate. Recall, you bulldozed much of this area just a few years ago to add a slurry wall to the levees. That was supposed to provide flood protection. Now, you claim that the same people who made that design, and profited from that construction can be put in charge of developing a plan to "fix" the problem you created with the slurry wall.

It is clear that 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. You have not provided evidence that the USACE claim that this extension and the methods planned are “needed” for flood safety.

2

This new project, Contract 3B, would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles. Almost half of the lower 26 miles of Parkway! I object to the extreme destruction of trees (including potentially 200-300 year-old heritage oaks); loss of rare, wild vistas and aesthetics in this pristine area of the Parkway; and the long-term loss of quality and access for recreation (hiking, biking, dog walking, fishing, picnics, kayak and paddle board access, bird and wildlife viewing, photography, and many other uses) for miles along the river’s edge, including the loss of dozens of unofficial, but much loved access trails, equestrian and rare shaded trails. These miles of habitat destruction threaten the wildlife corridor that

Outside expertise is needed. Not corporate representatives.

Dr. Duane Campbell  
[campd22702@gmail.com](mailto:campd22702@gmail.com)  
Duane Campbell  
[campd22702@gmail.com](mailto:campd22702@gmail.com)



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Wednesday, January 10, 2024 11:37 AM  
**To:** Sutton, Drew; publiccommentARCF16@water.ca.gov  
**Cc:** ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Sara E Denzler <sdenzler@me.com>  
Sent: Wednesday, January 10, 2024 11:17 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

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**From:** DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>  
**Sent:** Friday, January 12, 2024 10:49 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; Bailey.Hunter@usace.army.mil; Martin, Nathaniel J SPK  
**Subject:** [EXT] FW: Better USACE Proposal for American River 3B Project , ISSUES WITH STAGING AREAS etc.

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**From:** Alan Dowling <alandowling1@gmail.com>  
**Sent:** Thursday, January 11, 2024 6:49 PM  
**To:** DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>  
**Subject:** Re: Better USACE Proposal for American River 3B Project , ISSUES WITH STAGING AREAS etc.

You don't often get email from [alandowling1@gmail.com](mailto:alandowling1@gmail.com). [Learn why this is important](#)

Dear Team,

Please see below follow up items. We kindly await your responses.

3B:

Schedule stated to commence summer 2024;

1 | - What are the proposed dates / number of weeks / months so we know base planned 'durations' incase there's delays? There's only a few months to go...so very late to have this current vague schedule information per the presentation on Jan 10th 2024 (starts in summer 2024 was stated..etc.). Is there a P6 schedule?

2 | Construction Carbon accounting report - please provide?

In regards to local residential roads, staging areas, works adjacent to houses etc. :

- Please note that residents request / require detailed geotechnical analysis (not a general one as currently provided), OSHA standard safety mitigations and risk assessment plans... not just for the site itself but a qualitative risk assessment (QRA) or similar pertaining to air/noise/safety/risk for the residential properties mere FEET from proposed 3B construction 'shaded areas' past WATT Avenue - Larchmont.

3 | As a cancer survivor myself, my wife suffers from respiratory issues & we also have a 2 year old baby girl; we are very concerned about these plans over such a long schedule in an area already impacted by poor air quality.

Some works/staging appears to be planned mere feet from houses / backyards (EG: **Manlove pump station**) where families and children recreate on their own properties. This will risk impacts to foundations (pools etc. due to vibrations.), wildlife and personal health due to air quality, dust, movement of pests etc.

Please send us details on how each staging area particularly the Man Love location is being proposed to be used under contract 3B and how risks can be mitigated.

- Hours of working?
- What will be parked there equipment wise?
- Any material storage etc.?
- Where will the construction trailers be located due to generators, sewage etc?
- Are there any site/excavation works planned for the Man Love staging area?
- What are the protocols for vetting construction personell?
- Where will they park?

Regards,

Alan

On Mon, Jan 8, 2024 at 1:04 PM Alan Dowling <[alandowling1@gmail.com](mailto:alandowling1@gmail.com)> wrote:

Dear team,

I am writing to ask that you and other 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". We strongly question whether this work is necessary along this section of the American River and request more information.

There is a plan to have a **potential heavy equipment and perhaps materials staging area** mere feet from our residence adjacent to **Manlove pump station** just off Waterton Way; which creates large risks including but not limited to:

- air and noise pollution (our family is high risk health wise)
- risks to foundations etc. Has a geotechnical analysis been conducted and shared with local residents? We haven't been provided with anything
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We request an approach which is lower risk with reduced impacts to local residents while utilizing **Watt Avenue** which is in close proximity.

Further, we 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. We 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. We do not support the USACE claim that this extension and the methods planned are "needed" for flood safety.

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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 or damaged.

Thank you,

Alan James Dowling

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Friday, January 12, 2024 8:36 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: M. Wright <mlouw2@yahoo.com>  
Sent: Thursday, January 11, 2024 4:48 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.  
Mary Lou Wright  
Resident of Sacramento County for 60 years

Sent from ML

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 3:58 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: eric@ericanderton.com <eric@ericanderton.com>  
Sent: Thursday, January 11, 2024 3:24 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.  
Eric Anderton  
Nelya Anderton

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 3:57 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Jay D <jaydd1960@gmail.com>  
**Sent:** Thursday, January 11, 2024 11:10 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.  
Jay Domeny



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**From:** DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>  
**Sent:** Thursday, January 11, 2024 2:06 PM  
**To:** Sutton, Drew  
**Subject:** [EXT] FW: Public Comment Time Extension Request for ARCF SEIS/SEIR

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**From:** Dan Meier <14danmeier@gmail.com>  
**Sent:** Thursday, January 11, 2024 10:47 AM  
**To:** ARCF\_SEIS@usace.army.mil; DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>  
**Cc:** Bellas. Liz <bellase@saccounty.gov>  
**Subject:** Public Comment Time Extension Request for ARCF SEIS/SEIR

Please find attached letter from Sacramento Valley Chapter of the California Native Plant Society.

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Time Extension Request CNPS.pdf

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 10:22 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: Comments on Lower American River Levee Contract 3B

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**From:** acuflwr DJUTH <acuflwr@msn.com>  
**Sent:** Thursday, January 11, 2024 10:05 AM  
**To:** PublicCommentARCF16@water.ca.gov; ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Subject:** [Non-DoD Source] Comments on Lower American River Levee Contract 3B

My name is Gerald Djuth. I have been a resident near the contract 3B area for over 30 years and have walked that stretch of the American River thousands of times. I am also a retired Professional Geologist, Certified Engineering Geologist, and Civil Engineer, and have some professional experience with stream bank erosion and slope stability projects.

I am opposed to the Contract 3B remedy for the South bank of the American River between approximate river miles 9.5 to 11, or from Watt Avenue to Mayhew Drain. I believe that there are engineering solutions that could be implemented that will result in superior protection of the streambank and levees, while preserving the natural riparian habitat and its associated aesthetic and recreational value.

1 Engineering solutions are most effective when the correct solution is applied for the situation. The proposed solution for this stretch of the American River, a launchable toe and launchable trench, may have been the correct solution for the areas downstream by Paradise beach. However, Army Corps fails to recognize that the situation on the south bank is different. This stretch of the river is, in most places, intensely vegetated with mature riparian vegetation. This vegetation provides natural armoring to slow water velocity, root structure to stabilize the soil, and vegetative cushion to protect the slopes from water flow. Unlike the downstream areas, it has held up well to the 1986 and 1997 high flow events, needing only local stabilization work.

I believe the proposed strategy to prevent erosion of the levees is poorly thought out. The 2017 Lower American River Streambank Erosion Monitoring Report produced by the American River Flood Control District documents some erosion at the toe of the bank, but concludes that the levee is not threatened due to the width of the width of the berm. USACE's own documentation (Geotechnical Report, 2016, section 10.1) states no improvements are recommended. In the 2015 Erosion Protection Report, Section 7.1 Conclusions and Recommendations, USACE recommends to collect data for site-specific analysis of streambank protection and design protection based on the site-specific data.

2 Instead of collecting site specific data and designing protection based on the site specific needs, USACE wants to implement the same alternative used in downstream reaches that had shown distress during the previous high flow events. In their attempt to adopt a one size fits all solution, USACE's recommended solution will destroy the protection provided by the existing mature vegetation, resulting in higher water velocity by the banks and levees, and make them more vulnerable to erosion. This can easily lead to the necessity of installing more rip rap up the stream bank in the future.

I implore USACE to reconsider their proposal, and develop an alternative that utilizes and enhances the protection provided by the natural vegetation. Table 4.4 of the Erosion Protection Report shows that there are multiple soil bioengineering techniques that can be implemented to stabilize any local areas vulnerable to erosion. Any addition of rock armoring should be limited to stabilizing erosion at the toe of the embankment and done with light equipment or by working from a barge at the water's edge to eliminate, or at least minimize, any disruption to the natural vegetation.

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 7:39 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Emily Hodge Sunahara <ehodge000@gmail.com>  
Sent: Wednesday, January 10, 2024 11:09 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

To whom it may concern,

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

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

Thank you.

Emily Sunahara  
Resident along section 3B of the American River Parkway

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 7:38 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] American River Erosion project "3B" environmental documents

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**From:** Jeanne Pletcher <jeannepleletcher@comcast.net>  
**Sent:** Wednesday, January 10, 2024 8:44 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov; SPK-PAO SPK <SPK-PAO@usace.army.mil>  
**Subject:** [Non-DoD Source] American River Erosion project "3B" environmental documents

I just attended the Zoom Meeting: **Public Meeting regarding American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report.**

I have lived 2 blocks from the American River, just east of the Mayhew Drain, since 1976.

A few comments:

In the winter of 1986, we had very high water, and the levee held. There was a post at the base of the levee at Kansas Way with a "Countdown" to when we would be at 0 feet. We went down daily to check out the water level after work. We never overtopped the levee.

Years later, the levee was raised, widened (so that a vehicle could drive on top), and many heritage oaks were removed. One slab from one of the oak trees is currently on display outside the Rancho Cordova Library.

At that time, BRECA (Butterfield Rivera East Community Organization) tried our hardest to hope that the footprint of the levee could be modified to save some of these trees, to no avail.

Now, we are in a similar situation when the Army Corps of Engineers is trying to destroy the American River, designated as a wild and scenic river. Removing trees and destroying the riverbank by removing nearly all riparian vegetation including trees, and bulldozing the landscape, digging a trench, filling it with rocks, and covering it over with dirt.

The beautiful natural river will turn into a horrible, lifeless canal, not the beautiful river we are familiar with.

2 | Please read all the comments that were provided on the zoom meeting. I hope that on the Zoom Meeting on January 16th, you will be able to provide us with some updated options for this plan.

Jeanne A Pletcher  
2653 Yuma Cir  
Sacramento 95827

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 7:37 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Andrea Willey <awilley1@icloud.com>  
Sent: Wednesday, January 10, 2024 8:05 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 7:36 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: Loss of vegetative armoring and unmitigated loss of heritage oaks and habitat

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**From:** Avery, William E <averyw@csus.edu>  
**Sent:** Wednesday, January 10, 2024 8:00 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] Loss of vegetative armoring and unmitigated loss of heritage oaks and habitat

Loss of vegetative armoring and unmitigated loss of heritage oaks and habitat

1 Contract 3B proposes clearing river banks of vegetation and trees, including heritage oaks and other valuable tree species of heritage size (black walnuts, cottonwoods, Oregon ash, and white alder) on the south side of the river from Watt Ave to Larchmont Park. This is an area with well established, self renewing vegetative armoring provided by the existing root network and relatively impervious to erosion at flow velocities less than 8 ft per sec expected in a 160,000 cfs, or 200 year flood event. More advanced flow models that take into account vegetation and trees suggest the actual bankside flows at 160,000 cfs may be even lower. These models need to be considered by USACE in their analysis. Table 4-4 in the GRR Erosion Appendix suggest that vegetation such as class A turf grass can withstand flows up to 8 ft per second. Rood et al. 2014 found that mature riparian trees are even superior to grass and that “We recommend that riparian forests should be conserved to provide bank stability and to maintain an equilibrium of river and floodplain dynamics.” Further C3B proposes to dig trenches filled with rocks, lay in revetment on the cleared banks and cover this treatment with soil to create planting benches. For the 2 years of construction and 2 to 5 years post-construction it takes for significant vegetation growth and any form of vegetative armoring to occur these soils will be vulnerable to erosion at flow velocities as low as 2 to 4 ft per sec (Table 4-4, GRR Appendix Erosion Attachment E). So soil erosion risk increases significantly during this 4 to 7 year time period.

2 Further native riparian woodland habitat is not likely to reestablish itself when grown over a layer of riprap revetment. This is evidenced by the poor quality growth of vegetation limited to mostly coyote brush, willow, and the exotic Chinese tallow seen on experimental 2011 riprap revetments on the south side of the river in the SARA park area.

Any heritage oaks or other heritage sized tree species such as walnuts, cottonwoods, Oregon ash, and white alder are unlikely to return if planted over riprap especially since the warmer average yearly temperatures due to our changing climate further reduce the probability of recruitment and long term recovery of these trees.

3 Though there are mitigation sites proposed they are distantly located, high maintenance sites and in most cases not in view from the river. When visiting The proposed mitigation sites one is struck by the number of dying trees particularly the more riparian dependent trees such as Oregon Ash, and also the lack of White Alder. This suggests that the loss of local riparian woodland habitat is not being mitigated at all.

In summary what contract 3B proposes is destroying the erosion protection of vegetative armoring and the unmitigatable loss of heritage oaks and valuable riparian forest for an erosionally vulnerable soil layer on top of an arguably somewhat protective layer of riprap in an area where their own analysis suggests that it isn't even necessary.

4 For these reasons we ask that the south bank erosion protection projects upstream of the Watt Avenue Bridge especially in the Fair Oaks Formation clay banks protected zones of SARA Park river miles 9 - 11 be removed from Contract 3B. If critical spots are identified where erosion repair is required we ask that a surgical approach be applied working in from rivers edge using habitat preserving biotechnical engineering.

William Avery  
Professor Emeritus  
CSUS

Sent from my iPad

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Thursday, January 11, 2024 7:34 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Christy Epperson <cle6430@gmail.com>  
Sent: Wednesday, January 10, 2024 5:34 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you. Christy Epperson

Sent from my iPhone

**From:** [danaandersen5@gmail.com](mailto:danaandersen5@gmail.com)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink,Amber@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River Contract 3B Project  
**Date:** Friday, January 5, 2024 1:40:08 PM  
**Attachments:** [image001.png](#)

---

You don't often get email from [danaandersen5@gmail.com](mailto:danaandersen5@gmail.com).

Hello Ms. Woertink;

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

The US Army Corps of Engineers (USACE) Contract 3B, extends east from Howe Ave, to the Mayhew Drain with 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.

My concerns that I believe should be addressed before progressing further with this plan includes the following:

- 1 • What evidence is there that shows significant erosion in this area? We have been residents on Rogue River Drive and have walked this stretch of river for 40 years, including high water years, and we do not see a significant change on the river bank in this area from erosion.
  - This includes last year when we had record snow pack resulting in all the surrounding reservoirs reaching full capacity for the first time in many years and yet our river banks held! Are there not studies that show how the new technology guiding our Dam management and resulting river flow control have helped mitigate the erosion that would have otherwise occurred with high water? That should be done first, before destruction of our river takes place if it's not needed in the first place, at least to the extent that is being planned.
- 2 • Doesn't the presence of trees and shrubs, that would be removed, help retain riverbank integrity? Are there studies to show this approved project is the best alternative or are there other plans that could possibly show equal or better results with less destruction?
- 3 • The USACE approach will leave denuded, bare dirt banks for a minimum of 2 years during construction (and immature, isolated plantings for many more years to come). Not only is this going to generate noise and dirt with the heavy equipment running through our neighborhood but isn't this approach likely to put us at risk in high water flows as no work at all?
- The American River is designated as a “Wild and Scenic” River; does this bulldozed area change that for the surrounding community of people that enjoy the river for its beauty,

- 4 | wildlife, and fishing?
- Have studies been done to research the effects of this specific plan on the fish, turtles, and other wildlife that are sure to suffer as a result of significant change, if not complete removal, of their habitat?
  - We have yet to see how the bulldozed areas around Sacramento State University and Paradise Beach (prior Erosion Control Projects), will fare in high water flows. Shouldn't an assessment be done to show that previous projects have been put to the test and shown to be successful before we replicate what could be a failure?
- 5 |
- With increasing temperatures and climate change, isn't the removal of trees and the resulting loss of shade produced included to add to the effects of climate change, not help to mitigate it?

Contract 3B would bring the total length of American River Banks damaged by the USACE erosion control projects to 11 miles; This is 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 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.

As you know, the American River is often called the "Crown Jewel of Sacramento". Please do not let our "jewel" be stolen from us!

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic River status, and in turn answers to YOU in your role as county supervisors, as well as members of the SAFCA Board. I do not support the USACE claim that this extension and the methods planned are "needed" for flood safety in this zone. I urge you to stand up for this special stretch of the American River Parkway, that you also urge Sacramento Regional Parks to make a determination of "inconsistency" with the Wild and Scenic Rivers Act, and impose strong conditions that require the Army Corps to find more targeted and less destructive alternatives, rather than the devastation that is being proposed for Contract 3B.

Thank you,

*Dana Conway*

*2450 Rogue River Drive, Sacramento, CA*

*253-732-4396*

*[Danaandersen5@gmail.com](mailto:Danaandersen5@gmail.com)*

**From:** [sara.forestieri@gmail.com](mailto:sara.forestieri@gmail.com)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Wednesday, January 3, 2024 10:05:38 PM

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[Some people who received this message don't often get email from [sara.forestieri@gmail.com](mailto:sara.forestieri@gmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Jane Dolan and Chris Lief:

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

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.

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.

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

Thank you.

Sent from my iPhone

**From:** [Patricia LarsenGaumer](#)  
**To:** [Woertink, Amber@CVFPB](#)  
**Cc:** [Lief, Chris@CVFPB](#)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Thursday, January 4, 2024 10:30:50 AM

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Dear Jane Dolan and Chris Lief:

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

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.

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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.

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Thank you.



**From:** [Andrea Willey](#)  
**To:** [Woertink, Amber@CVFPB](#)  
**Cc:** [Lief, Chris@CVFPB](#)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Wednesday, January 3, 2024 5:42:10 PM

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Dear Jane Dolan and Chris Lief:

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

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Thank you.

Sent from my iPhone

## Calles, Jennifer@CVFPB

---

**From:** Woertink, Amber@CVFPB  
**Sent:** Wednesday, January 10, 2024 9:44 AM  
**To:** Calles, Jennifer@CVFPB  
**Subject:** FW: ACOE 3B contract- American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

**From:** Lisa Phenix <lisap@winfirst.com>  
**Sent:** Tuesday, January 9, 2024 12:34 PM  
**To:** Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>; Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>  
**Subject:** ACOE 3B contract-American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

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Dear CVFPB Representatives:

1 I live near the American River Parkway in Sacramento County, CA. I am deeply concerned about the impact of the above ACOE project as it relates to the Parkway. The ACOE's work so far along the river left the area barren. The upcoming 3B contract envisions similar destruction. There has got to be a way to improve the levees, reduce the risk of flooding and maintain the integrity of plants, trees, wildlife, visual and recreational goals of the American River Parkway. I support Sacramento County Regional Park's request to extend the comment period on this matter. I personally also so request that the comment period be extended and that less damaging to nature considerations be reviewed, implemented, etc. I ask that you and CVFPB reach out to ACOE to better address these concerns while also protecting and maintaining the integrity of the American River Parkway and our federally and state designated Wild and Scenic Lower American River. Thank you in advance for your careful consideration of these concerns and for support of our mutual goal to reduce flooding and maintain the crown jewel, of our area, the Wild and Scenic Lower American River and the American River Parkway. Sincerely, Lisa Phenix, Sac Co resident

**From:** [Avery, William E](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Tuesday, January 9, 2024 2:41:45 PM

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Dear Jane Dolan and Chris Lief:

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

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.

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.

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

Thank you.

William Avery  
Professor Emeritus

CSUS

Sent from my iPad

**From:** [Alan Dowling](#)  
**To:** [Woertink, Amber@CVFPB](#)  
**Cc:** [Lief, Chris@CVFPB](#)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Monday, January 8, 2024 12:49:41 PM

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Some people who received this message don't often get email from [alandowling1@gmail.com](mailto:alandowling1@gmail.com). [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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

There is a plan to have a **potential heavy equipment and perhaps materials staging area** mere feet from our residence adjacent to Manlove pump station ; which creates large risks including but not limited to:

- 2
- air and noise pollution (our family is high risk health wise)
  - risks to foundations etc. Has a geotechnical analysis being conducted and shared with local residents, we haven't been provided with anything
  - significant impacts to wildlife etc

We request an approach which is lower risk with reduced impacts to local residents while utilizing **Watt Avenue** which is in close proximity.

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. 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.

3 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

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As managers of the American River Parkway Wild and Scenic River status, 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.

Thank you,

Alan James Dowling

**From:** [Janice Cowden COWDEN](#)  
**To:** [Woertink, Amber@CVFPB](#)  
**Cc:** [Lief, Chris@CVFPB](#)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Wednesday, January 10, 2024 8:28:47 AM

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You don't often get email from [jmccowden@comcast.net](mailto:jmccowden@comcast.net). [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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Thank you,  
Janice Cowden

**From:** [Kadie Vourakis](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Wednesday, January 10, 2024 9:25:53 AM

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[Some people who received this message don't often get email from [kadievourakis@gmail.com](mailto:kadievourakis@gmail.com). Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Jane Dolan and Chris Lief:

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

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.

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

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

As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

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

Thank you.

Kadie Vourakis

Sent from my iPhone

---

**From:** JESSICA EPPERSON <jrepperson2002@yahoo.com>  
**Sent:** Thursday, December 28, 2023 11:21 PM  
**To:** Woertink, Amber@CVFPB  
**Cc:** Lief, Chris@CVFPB  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project

[You don't often get email from jrepperson2002@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Jane Dolan and Chris Lief:

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

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.

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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.

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Thank you.

Sent from my iPhone

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**From:** Woertink, Amber@CVFPB  
**Sent:** Wednesday, January 10, 2024 9:44 AM  
**To:** Calles, Jennifer@CVFPB  
**Subject:** FW: ACOE 3B contract- American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

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

From: Lisa Phenix <lisap@winfirst.com>  
Sent: Tuesday, January 9, 2024 12:34 PM  
To: Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>; Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>  
Subject: ACOE 3B contract-American River Common Features Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report

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

Dear CVFPB Representatives:

1 I live near the American River Parkway in Sacramento County, CA. I am deeply concerned about the impact of the above ACOE project as it relates to the Parkway. The ACOE's work so far along the river left the area barren. The upcoming 3B contract envisions similar destruction. There has got to be a way to improve the levees, reduce the risk of flooding and maintain the integrity of plants, trees, wildlife, visual and recreational goals of the American River Parkway. I support Sacramento County Regional Park's request to extend the comment period on this matter. I personally also so request that the comment period be extended and that less damaging to nature considerations be reviewed, implemented, etc. I ask that you and CVFPB reach out to ACOE to better address these concerns while also protecting and maintaining the integrity of the American River Parkway and our federally and state designated Wild and Scenic Lower American River. Thank you in advance for your careful consideration of these concerns and for support of our mutual goal to reduce flooding and maintain the crown jewel, of our area, the Wild and Scenic Lower American River and the American River Parkway. Sincerely, Lisa Phenix, Sac Co resident

**From:** [Phyllis Ehlert](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Tuesday, January 9, 2024 9:53:24 AM

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[Some people who received this message don't often get email from pehlert00@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Jane Dolan and Chris Lief:

I agree with these prepared remarks.

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.

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.

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Thank you.

Phyllis Ehlert



**From:** [Sandra Sanders](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Saturday, January 6, 2024 6:19:33 PM

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Dear Jane Dolan and Chris Lief:

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

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One of the reasons I bought my home two blocks from the river 24 years ago, was to be able to enjoy daily walks with my family and dogs in the beautiful riparian river habitat. I'm close to retiring and was looking forward to spending more time on this stretch of river. Please encourage USACE to take a less destructive approach to save as many of our trees and habitat as possible while working on the bank erosion project.

Thank you,

Sandra Sanders  
2728 Green Bay Way  
Sacramento, CA  
95826

Sent from my iPad

**From:** [Heather Crowley](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Sunday, January 7, 2024 11:48:02 AM

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Dear Jane Dolan and Chris Lief:

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

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Thank you.

Sent from my iPhone

**From:** [Sonia Lopez](#)  
**To:** [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)  
**Cc:** [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)  
**Subject:** Please Insist on a Better USACE Proposal for American River 3B Project  
**Date:** Monday, January 8, 2024 8:23:15 PM

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[You don't often get email from sonialopez01@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Dear Jane Dolan and Chris Lief:

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

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Thank you.

Sent from my iPhone

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**From:** Sutton, Drew  
**Sent:** Monday, January 15, 2024 1:08 PM  
**To:** Dorff, Becky  
**Subject:** FW: American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV, Comment Period Ends: 02/05/2024

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**From:** Avery, William E <[averyw@csus.edu](mailto:averyw@csus.edu)>  
**Sent:** Wednesday, January 10, 2024 11:40 AM  
**To:** Romine, Guy K CIV USARMY CESP (USA) <[Guy.K.Romine@usace.army.mil](mailto:Guy.K.Romine@usace.army.mil)>  
**Cc:** [Truitt.Robin@epa.gov](mailto:Truitt.Robin@epa.gov)  
**Subject:** [Non-DoD Source] American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV, Comment Period Ends: 02/05/2024

Dear Guy Romine,

I am writing as a concerned citizen but also on behalf of a very large group of other neighbors and fellow concerned citizens and a growing coalition of local Sacramento Area environmental groups.

I would like to officially request an extension to the review period for:

American River Common Features, 2016 Flood Risk Management Project, Sacramento, California Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV, Comment Period Ends: 02/05/2024

EIS No. 20230179, Third Draft Supplemental, USACE, CA,

Collectively we support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF).

1 The timing of the release of the SEIS/SEIR for public comment over the holidays is inauspicious, the numbers of subcomponent projects, MCP, 3A, 3B, 4A, 4B, Piezometer Network, and two big mitigation sites is unprecedented. The documentation appears to be missing some important components such as supporting data, key references and essential footprint figures!

We ask the US Army Corps of Engineers to support our request for an extension, preferably 30 days, for a thorough review of this complex and extensive set of documents and proposed projects.

It is vitally important to have an extension of the comment period especially because of the significant effects expected to occur within the Wild and Scenic American River Parkway, the "Crown Jewel of Sacramento".

2 In addition, I request that USACE hold an in-person public meeting on this significant proposed project prior to the close of the February 5th or, if extended, the new public comment period.

Thank you.

William Avery  
Professor Emeritus, Biological Sciences  
CSUS, Sacramento  
6000 J Street  
Sacramento, Ca 95819  
[averyw@csus.edu](mailto:averyw@csus.edu)

Sent from my iPad

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:31 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Kimberly Brown <kbcreeator@comcast.net>  
Sent: Tuesday, January 16, 2024 8:14 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.  
Kimberly Brown

My Son and his family live off of Watt ave and La Riviera

Sent from my iPhone



---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:29 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Colleen Karbowski <c\_karbowski@yahoo.com>  
Sent: Monday, January 15, 2024 8:51 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Hello,

I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF).

Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".

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

Thank you,  
Colleen Karbowski

Sent from my iPhone

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:28 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Casey Gilletti <gilletti28@gmail.com>  
**Sent:** Monday, January 15, 2024 8:43 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:27 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: KC Schuft <kcschuft@golyon.com>  
Sent: Monday, January 15, 2024 3:49 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

KC Schuft  
Senior Executive Associate, REALTOR  
Cal DRE: 01938861  
Masters Club Life Member  
Lyon Real Estate - Sierra Oaks  
916-502-0243

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:21 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Nicholas Piotrowski <npiotrowski@uwalumni.com>  
Sent: Monday, January 15, 2024 7:37 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:23 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** John <johnamathias@gmail.com>  
**Sent:** Monday, January 15, 2024 9:28 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:22 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] American River Common Features SEIS/SEIR Project

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**From:** Nicholas Piotrowski <npiotrowski@uwalumni.com>  
**Sent:** Monday, January 15, 2024 7:43 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] American River Common Features SEIS/SEIR Project

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.

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

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

As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

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

Thank you.

Nicholas Piotrowski - Concerned Citizen of this Neighborhood, Donator and Tax Payer



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:19 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Anne Fenkner <annefenkner@icloud.com>  
Sent: Monday, January 15, 2024 12:28 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:16 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Adam Doris <adamdoris11@me.com>  
Sent: Sunday, January 14, 2024 6:27 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:15 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** B.C. <bcobbold@gmail.com>  
**Sent:** Sunday, January 14, 2024 6:25 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:14 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Jodie <jodielee73@gmail.com>  
Sent: Sunday, January 14, 2024 6:19 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you,

Jodie Ross-Doris  
2506 Castine Ct  
Sacramento, CA

Sent from my  
iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:13 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] Please Impose Conditions on USACE for Wild and Scenic River Consistency

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**From:** candace furlong <furlong@surewest.net>  
**Sent:** Sunday, January 14, 2024 4:08 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PubliccommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] Please Impose Conditions on USACE for Wild and Scenic River Consistency

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

My husband and I bike and/or run and/or hike the trails every day. Either on the horse trails or bike trail, the tree canopies and other vegetation are vital to all creatures, as well as so integral to mediate climate change. We do NOT WANT THIS AREA CLEAR CUT LIKE THE TRAGIC RESULTS WEST OF HOWE AVE.

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!

As managers of the American River Parkway Wild and Scenic River status, 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.

Thank you.

Candace and Jerry Furlong  
1401 Arroyo Grande Dr  
Sacramento CA 95864  
(916)215-2169

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:12 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Jay D <jaydd1960@gmail.com>  
**Sent:** Sunday, January 14, 2024 12:24 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.  
Jay D



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:11 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Shawn Harrison <sharrison@soilborn.org>  
**Sent:** Sunday, January 14, 2024 12:31 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

To whom it may concern,

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

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

Sincerely,

*Shawn*

***Please note that I am now working a Tuesday through Saturday schedule. I will respond to email on those days.***

**Shawn Harrison, Founder & Co-Director**

Office [916.363.9685](tel:916.363.9685)

Cell [916.718.3563](tel:916.718.3563)

Fax [916.363.9686](tel:916.363.9686)

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:09 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: sara.forestieri@gmail.com <sara.forestieri@gmail.com>  
Sent: Saturday, January 13, 2024 3:53 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sara Forestieri

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:08 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Nelya Anderton <nelya.anderton@gmail.com>  
Sent: Saturday, January 13, 2024 7:13 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you,  
Nelya Anderton

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:07 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] REQUESTING AN EXTENSION AND MORE DETAILED REVIEW ARCF SEIS/SEIR

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

From: Kim Safdy <kimsafdy@gmail.com>  
Sent: Friday, January 12, 2024 10:11 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] REQUESTING AN EXTENSION AND MORE DETAILED REVIEW ARCF SEIS/SEIR

I appreciate you holding a video call to discuss the levy upgrades. As you know, many of us are concerned about the project's impacts.

- 1 I am a homeowner who lives next to the American River Parkway and uses the bike trail daily to commute. I also enjoy walking my dog on the shaded trails and carrying my inflatable kayak to the bank for a peaceful paddle on the river. The parkway's natural scenery and wildlife habitat are extremely special.
- 2 I am distressed to learn about the US Army Corps of Engineers' proposal on such short notice. Can you provide more time to demonstrate the need for this project and update the documentation accordingly?
- 3 It is unclear how the proposed upgrades will impact the community. Why is there a sudden need to address this particular area? What is the risk if we do nothing? What alternatives exist? If the proposal moves forward, how many
- 4 trees will be destroyed and where? What will the area look like after the project is complete? What impacts will this have on wildlife?
- 5 Once these details are complete, I request USACE to hold an in-person public meeting. The meeting should include a dialogue to address our concerns. It would be constructive to have a detailed map showing the scope of the work and a rendering of what the area will look like after the project.

The American River Parkway is the "Crown Jewel of Sacramento" because it's a natural area. Turning it into a water channel devoid of nature would be a grave disservice.

Thank you for your time.

Regards,

Kim Safdy

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 1:22 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: JoEllen Arnold <joellenarnold@mac.com>  
Sent: Tuesday, January 16, 2024 1:12 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

JoEllen Arnold  
joellenarnold@mac.com  
Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 1:10 PM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Mary Starkey <mk.starkey@yahoo.com>  
Sent: Tuesday, January 16, 2024 1:02 PM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Mary Starkey,  
Resident of Sacramento County

---

**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 12:32 PM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Dana Miller-Blair <djmblair@gmail.com>  
**Sent:** Tuesday, January 16, 2024 12:23 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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Dana J. Miller-Blair



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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 11:14 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Lewis Kemper <lkemper@lewiskemper.com>  
Sent: Tuesday, January 16, 2024 11:10 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Lewis Kemper

Lewis Kemper  
800 Saverien Dr  
Sacramento, CA 95864

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 11:13 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Francesca Reitano <freitano@gmail.com>  
**Sent:** Tuesday, January 16, 2024 10:21 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 11:12 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** sacked <sacked@sbcglobal.net>  
**Sent:** Tuesday, January 16, 2024 9:51 AM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Kathy Downey

Sent from my Verizon, Samsung Galaxy smartphone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 11:11 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Sadie Sanchez <sadiecly@gmail.com>  
Sent: Tuesday, January 16, 2024 9:26 AM  
To: ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
Cc: PublicCommentARCF16@water.ca.gov  
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

Sent from my iPhone

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:30 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Michael Yanuck <myanuck@hotmail.com>  
**Sent:** Monday, January 15, 2024 11:40 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you,  
Michael Yanuck

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:26 AM  
**To:** Sutton, Drew  
**Cc:** ARCF\_SEIS; publiccommentARCF16@water.ca.gov  
**Subject:** [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Barbara Camacho-Turner <blcamacho@hotmail.com>  
**Sent:** Monday, January 15, 2024 2:37 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** PublicCommentARCF16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Urgent Request

I have just been made aware of this project proposal. I am a long time resident of Sacramento with a background in K-8 education and many years serving as a board member of local beloved environmental education nonprofit Sacramento Splash. Knowing that **generations** of scientists are exposed to their first lessons outdoors along the Parkway, specifically this diverse section, I know what preserving this habitat means to our future. I am immediately concerned with the sterile way in which this landscape will be permanently altered and the habitat that will be lost if the proposal moves forward.

- 1 | Is there a better way?
- 2 | I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF). Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".
- 3 | In addition, I request that USACE hold an in-person public meeting on this significant proposed project.

Thank you.

Barbara Camacho-Turner

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**From:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Sent:** Tuesday, January 16, 2024 8:17 AM  
**To:** Sutton, Drew  
**Cc:** publiccommentARCF16@water.ca.gov; ARCF\_SEIS  
**Subject:** [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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**From:** Laura Davidson <laura.ann.davidson@outlook.com>  
**Sent:** Sunday, January 14, 2024 8:30 PM  
**To:** ARCF\_SEIS <ARCF\_SEIS@usace.army.mil>  
**Cc:** publiccommentarcf16@water.ca.gov  
**Subject:** [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

The area in question is so beautiful, and it means so much to my family. It is our favorite section of the river because of the gorgeous trees, green grass, and the abundant wildlife. We walk there regularly, three to five days each week. We have seen the results of the completion of similar work down river. The landscape is barren and depressing. It is horrifying to imagine this beautiful area suffering the same fate.

Thank you.

Laura Davidson



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**From:** Chris Enright <cnuchris@yahoo.com>  
**Sent:** Tuesday, January 9, 2024 12:39 PM  
**To:** safca-info  
**Subject:** Please host in-person 3B meeting

Hello,

- 1 | The draftEIR is long and complex. Discussion of real alternaties that would provide needed erosion protection without a scorched earth approach is needed. Please offer an in-person forum that would clearly explain how the current
- 2 | alternatives were developed, and why there are no other alternatives.

Thanks for your consideratin.

Chris Enright (retired civil engineer)

~~~~~

Chris Enright

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 16, 2024 4:57 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Rachel Hazlewood <rmhazlewood@sbcglobal.net>
Sent: Tuesday, January 16, 2024 4:53 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 16, 2024 3:42 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: etak123@aol.com <etak123@aol.com>
Sent: Tuesday, January 16, 2024 3:40 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.
Kate Rosenlieb

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 16, 2024 3:37 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Elaine Keane <ek800@hotmail.com>
Sent: Tuesday, January 16, 2024 3:19 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Hello,

- 1 | My family has lived and/or owned homes on both the Sacramento and American River in Sacramento since 1971 so I am very concerned with plans to destroy the beauty of our river.
- 2 | What is very concerning is the lack of information and input about this that has been received from any of our governmental agencies. We are members of local American River organizations and yet we have only recently(last 3 weeks) learned of this plan.
- 3 | We support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF). Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".
- 4 | In addition, we request that USACE hold an in-person public meeting on this significant proposed project.

Thank you.
Michael and Elaine Keane

Sent from my T-Mobile 5G Device
Get [Outlook for Android](#)

From: Sutton, Drew
Sent: Wednesday, January 17, 2024 3:14 PM
To: Dorff, Becky
Subject: FW: Letter of concern for USACE Project 3B South

Follow Up Flag: Follow up
Flag Status: Completed

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Wednesday, January 17, 2024 2:23 PM
To: Sutton, Drew <dsutton@geiconsultants.com>
Cc: Bailey.Hunter@usace.army.mil; Romine, Guy K SPK <Guy.K.Romine@usace.army.mil>
Subject: [EXT] FW: Letter of concern for USACE Project 3B South

EXTERNAL EMAIL

Drew,

We received this comment e-mail that apparently was not also sent to USCAE comment in-box.

Josh

From: Sandra Sanders <riverkayak4@gmail.com>
Sent: Wednesday, January 17, 2024 1:14 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Letter of concern for USACE Project 3B South

You don't often get email from riverkayak4@gmail.com. [Learn why this is important](#)

I am a resident who has lived one block from Larchmont Park and the stretch of river, identified by the 3B South erosion control project, for fifty-nine years. I walk the trails daily after work, kayak this stretch of the river, and volunteer many hours to clean it up. I was looking forward to enjoying more time there in my near future retirement. The whole reason I bought my house in this area was to enjoy this beautiful habitat. I've also heard from many of my neighbors that they are actually feeling mentally (and some physically) sick over the threat of the loss of our riparian habitat and wildlife.

1 I believe that the river bank erosion control for flood prevention can be done using a more targeted and less destructive approach. Please consider using smaller equipment to fix only the eroded bank areas needed instead of using large bulldozers which will destroy our vegetation and centuries-old heritage oak trees.

Specifically my concerns are:

- 2 * I do not want the 3B South stretch of river to end up looking like the barren stretch of river near CSUS.
- 2 * I ask you to use a targeted approach to fix what you need to and work around our heritage oak trees. Do not remove them and destroy our riparian habitat, which is home to many animal species.
- 3 * Once our century-old trees are gone, they are irreplaceable. No amount of mitigation and replanting of vegetation will replace them.
- 3 * The roots of these trees and vegetation have served as natural erosion protection for the past sixty years.
- 3 * This area is classified as a Wild and Scenic American River. I would like to see it preserved while you take a careful approach in your methods for flood control.

4 The two virtual meetings with pre-recorded presentations only allowed for limited public comment. A lot of important issues were raised regarding the SEIR that should be studied and addressed. Please consider an extension of the project to gather more public input and allow for in-person meetings so that we can get our answers from your expert consultants and engineers.

Thank you for your consideration,

Sandra J. Sanders
Committee Assistant II
Senate Natural Resources and Water Committee

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 10:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

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

From: SHARON WILSON <wilsonca5@yahoo.com>
Sent: Thursday, January 18, 2024 9:44 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

1 I understand the balance for safety and protection and as a resident of Rogue River on the levi side potential for flooding is a great concern but also the displacement of wildlife. I sit out a great deal, during the day I see an abundance of many birds, sparrows, hawks, blue jays hummingbirds woodpeckers, doves and others that I don't know. Recently I'm hearing an Owl, possibly two. To think that we are taking away their playground disheartens me. Maybe clear cutting would be a better balance, remove trees that are dead and dieing, leave the healthy, remove the shrub to allow for flood measures. Another thing I am concerned about is that with the work to be its creating more beach space, now, in the past I would be all for it, but with the homeless situation in Sacramento to me it's another place for them to go, which now brings litter and water pollution (they need to dispose of their bodily functions somehow) pests. I won't say vandalism because I have not experienced it personally, panhandling yes, theft no. (I lived in mid town with a homeless camp at the top of my street). I would rather not experience that again.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 10:06 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION - SEIS/SEIR

From: Ellen Ganz <ganz.ellen@gmail.com>
Sent: Wednesday, January 17, 2024 5:49 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION - SEIS/SEIR

Good evening-

- 1 | I live next door to Larchmont Park and I'm very scared of how this will impact the health of my child.
Please extent the time for review.
- 2 | URGENT! I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF). Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".
In addition, I request that USACE hold an in-person public meeting on this significant proposed project.
- 3 | There were technical issues at both online meetings, no questions were answered and there was not enough time for all the comments.
Please hold an informative in person meeting about exactly what to expect.

Thank you,

Ellen Ganz

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 10:02 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: objection to the Sacramento river project

From: Dale Bierce <dalebierce@live.com>
Sent: Wednesday, January 17, 2024 3:12 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] objection to the Sacramento river project

1 | Enough data has not been provided to prove that the erosion control measures being taken between Howe ave. and Watt ave. are needed. Please stop this project until more data is disclosed and reviewed by the public.

Dale Bierce

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 10:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Channelization

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

From: George Bertsch <gfbertsch@gmail.com>
Sent: Wednesday, January 17, 2024 2:51 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Channelization

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

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

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:54 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American river flood control upstream from wat ave

From: Adele Kruger <kruger4283@yahoo.com>
Sent: Wednesday, January 17, 2024 2:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; Rich Desmond <richdesmond@saccounty.net>
Subject: [Non-DoD Source] American river flood control upstream from wat ave

- 1 | After sitting thru 2 sessions of zoom about the levee work proposed upriver from watt ave I am
 - 2 | requesting a public mtg with an engineer with maps we can see to explain the necessity of more
 - 3 | work. What is the max outflow of folsom dam? what is the carrying capacity of the levees. The
- destruction to the riparian areas near campus commons/river park and sac state is a sad testimony to the engineering and planning done so far. We must have more time and info before this type of work happens again. thank you, adele kruger

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:29 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] American River devastation

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

From: Bruton, J Paul CIV USARMY CESPK (USA) <Joseph.P.Bruton@usace.army.mil>
Sent: Wednesday, January 17, 2024 11:43 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: FW: [Non-DoD Source] American River devastation

See below / Public comment

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

From: bgstriper@yahoo.com <bgstriper@yahoo.com>
Sent: Wednesday, January 17, 2024 12:07 AM
To: SPK-PAO SPK <SPK-PAO@usace.army.mil>
Subject: [Non-DoD Source] American River devastation

Sent from my iPhone

1 The destruction that your operation is doing to the lower American river in Sacramento county is unbelievable. The complete lack of environmental oversight, continuous major errors and complete lack of any sort of proper research for this project are abundantly clear to the majority who are witnessing this travesty of a project. Whether it's taking out trees that fundamentally support the river banks(see paradise beach), to making young fish habitat that sits out of the river at normal flows, this has been an embarrassment of monumental levels. Yet your operation presses on, destroying what was once a pristine area for questionable at best claims of flood prevention. It's a shame that this use or lose it grant money is being used for personal agendas and lining pockets in spite of the natural resources that you are blatantly destroying.

2 You guys are not fooling anyone though, the majority of locals see the ineptitude of this work and people are noticing. Every time a project that was done incorrectly is re done, people are seeing that. This includes the pathetic excuse of levee work that was done on the east northeast side of the river, 70 percent of which had to be redone this summer because it couldn't handle high water. Pretty embarrassing when a levee gets washed out by the water it's supposed to contain. Yet somehow after seeing all this , the public is somehow supposed to be confident in this embarrassment. We will begin documenting all of the environmental violations and reporting the to the proper authorities, the news, and wherever else we can share the truth of this atrocity. It is also noted that the work went far past the date it is legally supposed to in the fall, which flooded the river with silt during the salmon run.

3

Speaking of silt, is there no worry of the mountains of silt that is being deposited in the river? It is clearly choking the system, and with no end in sight how does this work in regards to fish health? With miles more of projects going upriver and just adding countless tons of silt, one has to wonder the extent of the damage this is causing.

All in all this is just another example of the army corps making poor decision after poor decision and doing an injustice to the taxpayers of this country by using our money to pay for fraudulent projects.

Who in your organization is connected to the companies doing the levee work? I'm certain there are connections to those making the decisions on this project as these jobs are clearly not science based.

Concerned and disgusted citizen

Benny

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:29 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Jensen Richert <jensen.richert@gmail.com>
Sent: Wednesday, January 17, 2024 11:27 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:25 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: Comments on SEIR for Lower American River Erosion Work - Riverberm Thickness

From: Bill Brattain <bbrattain@hotmail.com>
Sent: Wednesday, January 17, 2024 10:36 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: RichDesmond@saccounty.gov; SorgenKC@saccounty.gov; BellasE@saccounty.gov; Pat-Hume@saccounty.gov; Beth S <m.beth.s@hotmail.com> <m.beth.s@hotmail.com>; Kelvin.Lum@mail.house.gov; Bill Staack <bstaack@comcast.net> <bstaack@comcast.net>; Mark Berry <mb@deltacpm.com> <mb@deltacpm.com>; Peter Spaulding <petenyvtca@comcast.net> <petenyvtca@comcast.net>; Susan_Rosebrough@nps.gov; AmRivTrees@gmail.com; Gerald Djuth <acuf1wr@msn.com>; joshjthomas@gmail.com; MHI Gtkpr <mhigtpr@gmail.com>; Avery, William E <averyw@csus.edu>
Subject: [Non-DoD Source] Comments on SEIR for Lower American River Erosion Work - Riverberm Thickness

Dear Army Corps & DWR,

My name is William Brattain, P.E., and I am submitting comments on the SEIR for the Lower American River erosion work proposed in the above-referenced document. The area I am commenting on is at the Larchmont Park for contract 3B south at American River mile 10.5. I have already submitted two sets of previous comments on this document by email that focused on the flow velocity of the river and the distance of the Heritage oak trees from the base of the levee. These comments focus on the erosion along the riverbank and the thickness of the riverberm from the base of levee.

On January 17, 2024, I observed the area of the erosion and measured the thickness of the riverbank at the worst case scenario location where the erosion is closest to the base of the levee. I have attached several photos showing this area. It should be noted that currently there is access to the water for wading, fishing, and swimming, and that both people and dogs can safely enter the water and have egress from the water without having to navigate over large riprap. The area just downstream from this location has riprap already, and is completely inaccessible for recreational use of the river.

Several of the photos show the measurement I took from the edge of the erosion to the base of the levee. The measurement was exactly 100 feet at this worst case scenario location, and at other nearby areas the riverbank is even thicker. The thickness of the riverbank was also noted in the 2017 Lower American River erosion monitoring report as

2 the primary reason why the erosion is not threatening the levee. It should also be noted that the flow velocity of the water decreases drastically at the location of the current edge of the erosion during high water events. As the water flow increases, the higher velocity water does not get closer to the levee as was documented in my previous comments and is shown in the modeling for the American River flow velocity. This is another reason why the erosion should not significantly encroach on the levee from its current location.

3 The proposal to install large riprap along the section is totally unnecessary, involves the removal of the existing vegetation that is helping to prevent any erosion that might occur, and will prevent access to the river for recreation. If dogs or people try to enter the water after the riprap is installed, they will be in danger of being swept downstream and drowning because it will not be safe or easy to try to get out of the water with the riprap in the way.

4 I request that the project be modified to remove this section of the river from having riprap installed. Instead, it should have more focused work that will address specific locations that may be of some concern without destroying the trees and the recreational use of the river as was recommended in the 2017 erosion monitoring report.

Thanks,

William Brattain, P.E.



















From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:29 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Jenna Adrienne <garcia.jenna07@gmail.com>
Sent: Wednesday, January 17, 2024 10:40 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:19 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Jensen, Mikkel Herholdt <mikkel.jensen@csus.edu>
Sent: Wednesday, January 17, 2024 10:37 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Hello,

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

I have spent some time reviewing past reports of hydrology and planned erosion control in the area. Based on this, I can only conclude that the proposed Project 3B is destructive, excessive, and disastrously detrimental to the neighborhood designed by a non-local, out-of-state design team not familiar with our river, and **is not in line with the recommendations from previous reports**. In fact, the reports and peer review support vastly different measures that are not as destructive and detrimental to the neighborhood as that currently proposed in Project 3B. Specifically:

- In the **2015 Independent External Peer Review (IEPR) Report** on **page iv and v ("Results of the Independent External Peer Review")**:
 - 2 i. It was "**not clear [...] why the hydraulic profile for the future without-project (FWOP) condition is significantly higher than the profile for Alternative 1.**" In other words, according to the independent peer review, the report did not adequately argue why the flow profile is so much worse without intervention, undermining the whole justification for the project.
 - 3 ii. It was also "**not clear [...] why non-Federal agencies would not continue to undertake incremental improvements to the levee system...**" In other words, the FWOP assumes that local and state agencies would not perform any levee maintenance, which is a poor baseline to compare to.

- In the **2017 Lower American River Streambank Erosion Monitoring Report** (MBK Engineers, May 2018):
 - i. At the stretch of the river including project 3B (LAR RM 6 to 11), the modeling sees <10 fps in the main channel and <6 fps at the levee at 115,000 cfs, and <12 fps in the main channel and <7 fps at the levee at 145,000 cfs (Page 4).
 - 145,000 cfs is the current FEMA “Base Flood” flow; 115,000 cfs is the proposed FEMA “Base Flood” flow (1/100 Annual Exceedance Probability).
 - The highest peak flow in 10/2016 – 10/2017 was just under 85,000 cfs, with most flows much lower (Figure 2).
 - The report also clearly states that soils with vegetative cover can **support 6-7 fps mean channel velocity**.
 - The peak flows are localized to a narrow portion of the river (plates 6-9 at the back of the report for the two flow volumes), making it appear that the mean flow (and certainly the flow near the levee) is **below the good vegetative cover support, even at estimated FEMA Base Flood**.
 - ii. Page 5: LAR RM 5 to RM 11: “erosion, at flood flows, will be an ongoing problem in this reach due to the high velocities and will eventually require structural measures.” Based on the analysis in the bullet point above, **why can this these measures not involve vegetative cover controls and targeted levee reinforcement, as opposed to the blanket destruction currently planned by the USACE?**
 - iii. Page 6: LAR RM 10.5 Left: “The soils at the site appear to be non-cohesive soils that would likely erode rapidly during a high water event, especially if the vegetative cover continues to degrade due to high recreational use.” **On Plate 8 showing the 145,000 cfs, the flow at RM 10.5 appears to be 3 fps at the rivers edge, and at most 10-11 fps in the center channel at RM 10. The flow gets substantially slower at RM 10.5 Left. Given this modeled flow profile, the report seems to support targeted erosion control at RM 10.5 Left, not the destruction of Project 3B currently in proposal.**
 - iv. Page 7: LAR RM 9.8 Left: “This planting appears to have reduced the rate of erosion as it has not progressed significantly since 2016,” suggesting that **no major interference is needed**.
 - v. Page 9: **Report does not support major interference as outlined in the 3B proposal.** Specifically:
 - “The primary cause of annual surficial erosion can be attributed to high pedestrian traffic and steep and poorly vegetated bank slopes in areas of non-cohesive soils.” This is a broad generalization at odds with the level of vegetation in many places along the river, and suggests local targeted interventions (riprap, increased vegetation) may fix local issues.
 - “While these [higher than average flows] might have affect[ed] the channel, they **did not appear to contribute to significant erosion on the levees or banks in a way that would affect the performance of the flood control system.**”
 - The report, on this same page, also states that “**...erosion has not advanced into the waterside levee cross section along the surveyed section of the LAR.**”
 - vi. Page 10: Summary table:
 - RM 10.5 Left: “**Upstream portion of site has not degraded significantly since 2016 inspection.**” “**Repair of the site will need to integrate recreational use,**” a goal currently not captured in the 3B project. “**Cobbles with vegetation or other biotechnical measures such as brush mattress, willow waddles or brush boxes [...] are a possible solution.**” This recommendation is again starkly at odds with the current much more destructive measures of 3B project. **The USACE should thoroughly address why these measures, as suggested by USACE engineers just a few years previous, are now suddenly insufficient for this stretch of the river.**
 - RM 9.8 Left: “**Erosion [...] does not appear to have progressed significantly since 2016.**”

Additionally, the current Project 3B, in its current form, does also not adequately accommodate recreational use of the river. In fact, this again goes against the recommendation in earlier reports:

10

- In the **2017 Lower American River Streambank Erosion Monitoring Report** (May 2018), page 10: **“Repair of the site will need to integrate recreational use,”** a goal currently not captured in the 3B Project.
- The current project will **disrupt use of the river for 3 years**, and will **include many more years of regrowing before the river and its vegetation will resemble anything near useable for the public**. One need only look at the north bank across from Sac State to see what the river will look like for many seasons to come, after the engineering work is done. **The USACE need to address this loss to the neighborhood and provide adequate alternatives for the duration of the project**, something which is woefully lacking in the current Project 3B plan.
- Similarly, **the final product needs to be of recreational equivalency to the current river**. Referencing the work done at the Sac State south side years ago (project started in May 2001 by Guy West Bridge), this is not the case:
 - i. The river is artificial, straight, without areas in which to wade or go explore the river. There are also no still areas for fish to stand. The river at this stretch is a canal, with little recreational value compared to the current stretch of river by and around LAR RM 10.
 - ii. There are not built-in pathways to access the river in the completed project by Sac State.
 - iii. The vegetation which has taken over by Sac State on the south side of the river following the 2001 USACE project is ripe with invasive species such as star thistle and not at all equivalent to what is currently found at and around LAR RM 10. The revegetation efforts, even more than 20 years after the project, clearly have not succeeded in revegetating the bank properly.
 - iv. Recreationally, the stretch of the south bank of the American River by Sac State is more of a canal, and not the recreational equivalent of the current reach of river at and around LAR RM 10. **The USACE need to ensure that recreational use is equivalent during the project, as well as in the decades after.**
 - v. The bank work will also displace bike commuters, as **the river path serves as a major bike commuting route for work and for Sac State students**. The USACE must adequately address this issue as part of their plan, and the response cannot be to displace the bike traffic onto local roads, on which no protected bike paths exist.

Furthermore, **Project 3B must address the health, environmental, and quality-of-life impact on the local community during construction**. The current plan fails to do so.

11

- The loss of vegetation and habitat is a strong negative impact on the community, and offsetting this impact by providing mitigation sites elsewhere is still a net loss for the community. The project damages our neighborhood and offers to offset this with improvements in other neighborhoods removed from the impacted neighborhood. This is a severe detriment to our neighborhood and its livability and an **unacceptable environmental injustice that the USACE need to properly address**.
- **Noise, dust, and engine exhaust will disastrously affect the neighborhood** – the USACE acknowledged as much in their public hearing pre-recorded presentation on January 10 and January 16, 2024. People live in these neighborhoods; being impacted by 3 years of construction, as described in the project, is nothing short of disastrous. Some people live a few dozen feet from the construction zone which the USACE acknowledge will suffer from detrimental emissions. The blatant use of destructive bank work, without proper consideration of a more targeted approach as recommended in reports just a few years prior, should not proceed without careful further scrutiny, if at all.
- Noise, dust, and engine exhaust will **disastrously impact children playing at Larchmont Park and children’s learning at Erlewine school**. The detrimental outcomes on developing children, both in terms of health and learning, of the impacts the construction will bring, are well documented. Again, the USACE Project 3B plan is irresponsible and should be carefully scrutinized.

- The USACE **need to ensure that this project does not negatively impact on the community before proceeding with their current destructive plan, and should take every reasonable measure to carefully consider more targeted, less destructive approaches.**

12 Finally, the impact on existing wildlife are also not at all adequately addressed in project. Based on the testimonies of experts at the January 10 and January 16, 2024 public hearings, it is clear that the proposed Project 3B work will be irredeemably disastrous for the wildlife currently living in the stretch of riparian woodlands of the project area. The current project plan does a wholly inadequate job of addressing any of these concerns, and the ensuing loss of wildlife will likely be irrecoverable.

13 In summary, judging from previous engineering reports, Project 3B is an unnecessary and overly destructive plan which will disastrously impact humans and wildlife in the area for decades. I request that USACE, at the very least, hold an in-person public meeting on this significant proposed project, and consider targeted, non-destructive alternatives to the current calamitous Project 3B plan.

Thank you for your time,

Mikkel Herholdt Jensen

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:17 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

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

From: Patty Selsky <phselsky@surewest.net>
Sent: Wednesday, January 17, 2024 8:38 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

1 | I spend Sunday mornings walking the levee upriver from Watt to Gristmill access. The loss of this natural space, the birds, animals and multiple old trees that shelter them would be a disaster. I am opposed to the proposed bank erosion project on the America River.

Patricia Selsky

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:13 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Porter, Jennifer S <jennifer_porter@baxter.com>
Sent: Wednesday, January 17, 2024 8:21 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Hillrom is now a part of Baxter

Jennifer Porter
Sr. Account Executive
Respiratory Health
Vest/Life2000 NIV/Volara/Monarch/Synclara

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:07 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Ken Firl <Ken@jssalmonds.com>
Sent: Tuesday, January 16, 2024 11:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:05 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Naomi Ennis <stopparkwaydevastation@gmail.com>
Sent: Tuesday, January 16, 2024 9:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Hello,

I strongly oppose the current levee work that is bulldozing thousands of trees along the American River Parkway. I am requesting a less invasive and more targeted approach that does not remove the large canopy trees.

I support Sacramento County Regional Park's request to the US Army Corps of Engineers for more time to ADEQUATELY review the draft SEIS/SEIR (for ARCF).

Please give us more time for a thorough review of this complex and extensive set of documents and proposed project. It is vitally important to have an extension of the comment period due to the significant effects expected to occur within the American River Parkway, the "Crown Jewel of Sacramento".

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

Thank you.
Naomi Ennis

[Sent](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:01 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Public Comment for 1/16/24 ACOE meeting regarding Draft SEIS/SEIR and Contract 3B

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

From: Lisa Phenix <lisap@winfirst.com>
Sent: Tuesday, January 16, 2024 7:34 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Public Comment for 1/16/24 ACOE meeting regarding Draft SEIS/SEIR and Contract 3B

Dear Sirs:

Please include this email as public comment for the Jan 16, 2023 530 meeting by ACOE. I was not able to attend due to work.

1 I live near the American River Parkway in Sacramento County, CA. I am deeply concerned about the impact of the above ACOE project as it relates to the Parkway. The ACOE's work so far along the river left the area barren. The upcoming 3B contract envisions similar destruction. There has got to be a way to improve the levees, reduce the risk of flooding and maintain the integrity of plants, trees, wildlife, visual and recreational goals of the American River Parkway.

2 I support Sacramento County Regional Park's request to extend the comment period on this matter. I personally also so request that the comment period be extended and that less damaging to nature considerations be reviewed, implemented, etc. ACOE has a duty to respect the integrity of the American River Parkway and our federally and state designated Wild and Scenic Lower American River.

Thank you in advance for your careful consideration of these concerns and for support of our mutual goal to reduce flooding and maintain the crown jewel, of our area, the Wild and Scenic Lower American River and the American River Parkway.

Sincerely, Lisa Phenix, Sac Co resident

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 9:00 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Christine Norman <czarina1107@comcast.net>
Sent: Tuesday, January 16, 2024 7:31 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

Sent from my iPad

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 8:59 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: DAVID ZEANAH <zeanaphile@aol.com>
Sent: Tuesday, January 16, 2024 7:00 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 18, 2024 8:58 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: TERI HOTTMAN <hottjett@yahoo.com>
Sent: Tuesday, January 16, 2024 6:59 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.
Teri Hottman
Sent from my iPhone



January 19, 2024

U.S. Army Corps of Engineers

Public Affairs Office

Attn: ARCF SEIS

1325 J Street, Room 1513

Sacramento, CA 95814-2922

ARCF_SEIS@usace.army.mil

RE: Public Comment on Levee Erosion Project on the American River

Dear Administrators,

Thank you for having the two virtual meetings on January 10 and 16th, in which 167 and 190 members of the community, respectively, had the opportunity to hear about this project and voice their concerns. Many voices were heard that echoed similar sentiments.

Unfortunately, the meeting did not meet its objective to inform the public for several legitimate reasons:

1. The untimely release of information over the holiday with inadequate time to review.
2. Many large and complex projects lumped into one presentation.
3. The legends of the slides had general labels ("staging area, buffer zone, etc") that do not provide vital details needed to understand specifically what is going to take place in those areas highlighted.

Andrea Willey MD
Board Certified Dermatology
Mohs & Reconstructive Surgery

T 916-922-SKIN
F 916-922-MOHS
skin@andreawilleymd.com
www.andreawilleymd.com

2277 Fair Oaks Boulevard
Suite 402
Sacramento
CA 95825

4. The print is small and grainy and does not allow for close examination in real time as the presenter spoke.
5. The presentation was pre-recorded and no person was available to answer questions in real time to provide any understanding or discussion of what is planned.
6. The scope of the project is far too large to adequately address in this platform and time frame.

Ultimately, the intended information was not conveyed, other than the message that a huge area of the “Jewel of Sacramento” that is a historic and designated California “Wild and Scenic River” along with its dense wildlife population is about to be forever destroyed for reasons that are not convincingly justified and for which alternative measures have not been adequately explored. Many voiced the absolute outrage this project engenders and the ill-thought out and unappreciated and excessive impact on the riparian habitat and wildlife that would be displaced and likely forever lost. There was not one individual on either of these calls expressing satisfaction with the planning or proposal put forth.

Participants included experienced and respected engineers, geologists, hydrologists, ornithologists, biologists, wildlife experts, physicians, residents, individuals concerned with health and environmental impacts, and long-time natives concerned with the destruction of their valuable designated wildlife and recreation area. Participants unanimously asked for an extension for review of the information, an in-person meeting with an engineer or informed member of the team to address the concerns in the presence of the community in a setting that would facilitate an effective discussion of the issues this project raises, as well as an onsite walk thru to further facilitate meaningful information exchange and discussion. These facts

along with the magnitude of destruction proposed in this project mandates a pause on the project for further discussion, planning, and review.

3 I am a native of Sacramento and live along mile ten of the levee in what is designated as the critical zone on the flood map, and as many experts and residents expressed, I am not even slightly convinced that this project is necessary or useful. As engineers, geologist, and hydrologists stated, removing the natural trees and vegetation that have effectively protected the levees which have been fortified with cement walls already, and replacing them with rocks and dirt makes no sense, and violates the mandates of the American River Parkway Plan and the California Wild and Scenic Rivers Act. Moreover, the proposed changes have not been proven to be necessary and may worsen erosion, which is currently evident in the area downstream that was completed two years ago. This needs to be studied further before proceeding with this project. As voiced by so many experts and citizens alike, any changes made need to be localized, addressing specific proven problems, with greater effort and attention to the preservation of the riparian habitat and the wildlife that inhabit it. This will require going back the drawing board to come up with better solutions that are appropriate and acceptable to those who will be affected.

5 I am a physician-scientist with a background in veterinary medicine and have spent the past five months studying the waterbird habitat on the lower American River. We have witnessed complete and total destruction of the riparian habitat that has displaced thousands of terrestrial birds, waterbirds, and wildlife that inhabited the area down stream where similar work by the USACE was recently completed. The current plan would continue to wipe out miles of essential habitat of terrestrial birds, waterbirds, and wildlife that are not at all protected by the mitigation plan.

5
cont'd

The proposed mitigation plan is fully inadequate. Specifically, the SEIS/SEIR does not address the loss of open waterbird foraging and roosting habitat, and the proposed mitigation area as it is written does not provide adequate shelter for waterbirds or protection from predators. The waterways are too narrow to provide safety for roosting waterbirds and the banks without adequate vegetation and mature trees to provide shelter and protection from predators. The concept that wiping out miles of riparian habitat and designating a single man-made area for all wildlife populations to live is not viable. This is like wiping out an old and well-developed neighborhood and supplying a parking lot for all the families to live in and expecting them to thrive. The mitigation plan needs to provide adequate habitat essential for birds, waterbirds, and all the diversity of wildlife that inhabit the area. Specifically, in addition to an open pond habitat far away from the shoreline that roosting birds need, mature trees that overhang the water's edge are needed to provide shelter and shade for the wildlife and the fish populations that feed them. The current plan does not include an open pond habitat adequate for roosting birds and the planned overhanging trees take decades to grow and mature and cannot provide protection before then. The mitigation of habitat needs to be in place before the habitat is destroyed in order to preserve the wildlife.

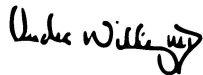
6

In addition, the plan indicates that erosion around single trees at the waters edge have been identified that are at risk for erosion. However, as stated by many experts in the meeting, those trees and vegetation also provide erosion protection. Indeed, fallen trees provide a natural and vital habitat for fish, birds, and waterbirds! Not to mention, the mature oaks that currently exist in the area, which are hundreds of years old, are not replaceable.

7 So many aspects of this project need to be thought through and replaced with a refined plan that defines specific areas of concern and finds solutions with modern updated models, taking into account new information that has developed since the original plan was created, and needs to better address and avoid the destruction of the riparian habitat and consider the development of new habitats in advance of the displacement of wildlife. Other alternatives, such as redirecting water to other areas where new habitats can be created to reduce flows without destroying critical waterbird and wildlife habitat should be considered.

8 The USACE needs to halt this project and accept the help and advice of local engineers, ornithologist, biologists and residents who know and are invested in protecting this area. The public outcry against this proposal is so loud it is deafening. There has been a resounding call to pause the project and reconsider additional options. There has also been a suggestion that the push for this project and the time-lines presented are influenced by the potential loss of funding imposed by existing contracts. There has also been discussion of legal actions by the public. I suspect this is true and one can only hope that if the USACE does not respond appropriately that the latter will take place.

Sincerely,



Andrea Willey, MD

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 19, 2024 8:11 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Polly Murphy-Jones <pollymj@mac.com>
Sent: Thursday, January 18, 2024 11:32 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Polly Murphy Jones

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 19, 2024 8:10 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: MP Barber <trainman693@yahoo.com>
Sent: Thursday, January 18, 2024 10:20 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

-MB

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 19, 2024 8:09 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on Dec 2023 DRAFT SEIS, SEIR for the American River Common Features, 2016 Flood Risk Management Project

From: richard hartzell <ripster1969@yahoo.com>
Sent: Thursday, January 18, 2024 7:36 PM
To: publiccommentsarcf16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Comments on Dec 2023 DRAFT SEIS, SEIR for the American River Common Features, 2016 Flood Risk Management Project

To Mr. Guy Romine -USACE and Mr. Josh Brown- CVFPB ,

Below are my comments concerning the Dec 2023 Draft SEIS/SEIR for the 2016 ARCF Flood Risk Management Project and the specific reasons why Alternative 5B, Watermark Farms mitigation site or other nearby mitigation site within 1 mile or so of the Watermark site should be selected.

COMMENTS :

1 I strongly recommend adopting & implementing Alternative 5b --Watermark Farms Sacramento River Mitigation Site -- as described in your Draft SEIS/SEIR for the ARCF 2016 FRMP dated December 2023.

My position, is the Watermark Farms site is geographically best located to mitigate some impacts from the Sacramento River East Levee Contract 2 (SREL2) that affected a pair of eagles with a nest in a redwood tree near the intersection of Arabella and Harmon.

2 The SREL 2 Preparation work removed some levee infrastructure that protected a stretch of this local Eagle pair's levee territory along the East Bank of the Sacramento River from pedestrian activity. This EAGLE pair now desperately needs a site that restricts pedestrian intrusion near the remaining Sacramento river trees that this nesting pair is using to perch and fish from.

IN preparation for SREL 2 levee degrade -- 2 levee cross pipe gates very close to this Eagle nest were removed along with a downstream cross levee fence at the old GROZA property. Additional SREL2 preparation work also removed a number of signs that legally restricted use of the levee maintenance road from pedestrian and recreational access.

The removal of such levee gates and fences led to a sudden flood of pocket area residents traveling along the gravel maintenance road on top of the Levee. This switched the historical use of this levee gravel road from occasional levee maintenance access to a daily recreational, public use path.

Prior to the removal of the Groza levee fence and the 2 Garcia levee pipe gates at their historical dock and past marina, there was no open public use of the levee maintenance road -- The solitude of the area -- was likely why this Eagle pair built their nest there. This Eagle pair returned for several years-- and were very active each year re-building their nest from Mid-October to mid-January.

Once the pipe gates were removed and daily use by pedestrians as well as folks walking their dogs off leash increased - the eagles relocated their Arabella/ Harmon nest to a tree on the Yolo side of the river and recently to a tree near to the Deep water Ship channel.

During construction of the SREL 2 work itself (after pedestrian access was again restricted)-- this eagle pair returned to perching on cotton wood trees in 3 areas, a large cottonwood tree next to the Garcia dock , a cottonwood tree just upstream next to a private dock behind Arabella and a very large levee cottonwood tree behind Benham way. Surprisingly , these Eagles were not disturbed by SREL2's Heavy/ large construction equipment . However when construction personnel left the cabins of their Heavy Equipment or went outside of their vehicles to discuss things in person-- the Eagles would stop perching and fly away. IN addition to perching-- the Eagles were still breaking off dead branches from cottonwood trees (behind Arabella , Benham and Surfside) and carrying them to their new nest.

During SREL2 construction -- the Eagles only flew away when they saw actual people on top of the levee. After the levee was degraded -- the Eagles would no longer fly way when construction workers exited their cars/ heavy machinery. -- Once the levee was degraded, it appears that the vertical distance from their cottonwood tree perches to any construction workers on top of the levee degrade was far enough that it no longer scared or caused the Eagles to fly away.

After the SREL 2 work was completed and the construction area fencing restricting public access was removed -- a significant influx of pedestrians, dog walkers and even bike riders on the gravel levee maintenance road returned. As this recreational use increased-- the Eagles perching became less and less. This November and December (2023) was the first time the eagles stopped breaking branches off of trees behind homes on Arabella or Benham for nest building-- After October this year, the eagles suddenly stopped perching altogether, behind Arabella and Benham . They are, however, still occasionally perching on some trees behind Surfside and Brickyard where the temporary cross levee fences were recently re-installed. The signs of their perching -- can be seen from the amount of white excrement on the ground below those trees (and how quickly the amount of excrement returns after each rain storm washes it away)

If the Pipe gates removed for SREL 2 are not replaced and the levee upstream of the old Garcia marina remains open to all pedestrian traffic and recreational use, it becomes immediately urgent to provide this nesting pair of eagles -- some protected area along this stretch of the River -- where the eagles can perch in trees and fish without the proximity of people, or dogs, or active levee bike recreation..

This situation of Eagles pairs-- needing a protected area (with fences or such restricting people from the area) is also needed at two other nearby Eagle nesting areas (the Discovery park site and the Rollingwood bluffs/ Lake Natoma site) As most of the Sacramento County sites are very difficult to fence off from Pedestrian access -- either politically and effectively -- the YOLO county , Watermark Farms site is one that could be implemented. The increase in pedestrian access, bike riders and dog walkers behind and upstream of the old Garcia marina has also started impacting a number of active river fox dens along this stretch of the Sacramento River.

As the City of Sacramento and CVFCB moves to open up the last remaining closed Greenhaven and Little Pocket levee areas to open public access-- the urgency of establishing protected areas for Eagles -- is significant.. It is for these reasons that such mitigation sites need to forward quickly while such wildlife still exists.

3

If the Watermark Farms site, time wise or economically, is too cumbersome to accomplish quickly , then an alternative site to consider is the past Da Rosa Marina site. That area belonged to the State Lands commission for a number of years before it was recently transferred to the City of Sacramento . The Da Rosa site contains enough river side berm/ land area , where just the river berm itself could be fenced off -- (without the need for any cross levee fences) That site appears to have enough horizontal distance from any open levee top path -- to provide Eagles on the SAC County side areas to perch & nest without human disturbance. Fencing that area off would also help restrict it from continued use by the un-housed camping there. As the Da Rosa Site has been a magnet for illegal camping for a number of years (long before the latest covid surge), the City would likely support transferring this property back to the State free of charge . A fenced off Da Rosa Marina site could also provide some protected habitat for the active river fox dens that were impacted by all SREL work to date.

4

A second alternative for the Watermark Farms site-- to consider would be the immediately adjacent upstream (Yolo county side) parcel north of the Sacramento Regional sewer district pump plant facility . Both sides of that parcel already have levees boarding it and several existing seasonal ponds and marshy areas.

IN SUMMARY

5 I ask this draft SEIS/ SEIR revalidation -- to mitigate for the effects of increase pedestrian use from the SREL contracts and implement a nearby site to address those levee areas that were historically closed to pedestrian access --- and where wildlife like EAgles and foxes have established territory and dens.

6 If the Watermark Farms Sacramento River Mitigation Site (or other nearby site on the Sacramento river) can not be established immediately -- I strongly encourage that at least a few temporary fenced off levee and riverside berm areas be established to allow the current Eagle pair and river fox populations to remain until other nearby mitigation sites can be purchased & established.

Regards,

R. Hartzell, Private Citizen

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 19, 2024 8:08 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features public comment

From: Steve Schweigerdt <sschweigerdt@gmail.com>
Sent: Thursday, January 18, 2024 6:55 PM
To: PublicCommentsARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Common Features public comment

Thank you for your work to improve our flood control and the opportunity to comment on the project.

I have a number of items I would like to comment on with the overall theme that better long term thinking that incorporates nature based solutions is needed to improve the overall quality of life that these project are bringing to our city:

1. Magpie Creek - the area you are making "improvements" to is a channelized and engineered system that undermines natural processes in the area. There is substantial vacant land near the creek. Have you attempted to acquire adjacent property to widen and naturalize the creek system with off stream basins that would add to habitat? That is the type of project that should be happening along all Sacramento's channelized creeks.
2. Regarding American River Contract 3B North and South please take every effort to minimize the removal of trees. The Parkway in this area is narrow and we need shade and existing heritage trees for habitat and enjoyment. Mitigation should be required for any trees removed.
3. American River Contract 4A alternatives I support the Proposed Action Bike Route Reroute - it will provide a preferable route through the Parkway than the current route on the levee toe.
4. American River Mitigation Site - Coordinate with Sacramento County Regional Parks on the design and ensure public access with multiuse trails. There must be public access provided through multi use trails or else the site will become a blighted homeless hideout. There should be a portion of the pond retained for off channel habitat, but the whole thing is not necessary. The Urritia site needs to be integrated into the trails system that connects Discovery Park and Camp Pollock and should have bicycle access since that is the primary use in the lower Parkway. It provides an opportunity to expand the off road bicycle pilot program and is the only way to prevent damage to mitigation plantings. The trails system should be expanded into Woodlake, where there are ample opportunities for additional mitigation planting areas as well and a few well placed bridges would increase access opportunities. You should also be looking at the Kassis property upstream as a potential mitigation planting area. Please let me know if I can help with that effort.

Thank you,

Steve Schweigerdt

See our project to make Sacramento into

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 19, 2024 8:07 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Vanessa <theothervandy@gmail.com>
Sent: Thursday, January 18, 2024 5:43 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

From: [Porter, Jennifer S](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 17, 2024 8:29:37 AM

Some people who received this message don't often get email from jennifer_porter@baxter.com. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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.

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

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

As you know, the American River is often called the “Crown Jewel of Sacramento”. Please do not let our “jewel” be stolen from us!

Sacramento Regional Parks officially manages the American River Parkway Wild and Scenic

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

Thank you.

Hillrom is now a part of Baxter

Jennifer Porter

Sr. Account Executive

Respiratory Health

Vest/Life2000 NIV/Volara/Monarch/Synclara

From: [Laura Langham](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 10, 2024 12:15:45 PM

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

Dear Jane Dolan and Chris Lief:

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

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.

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Thank you.

Laurie Langham

From: [Joshua Thomas](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Friday, January 5, 2024 1:58:52 PM

Some people who received this message don't often get email from joshjthomas@gmail.com. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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Thank you.

Sent from [Mail](#) for Windows

From: [Helen Gallagher](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Monday, January 8, 2024 3:47:49 PM

[You don't often get email from heleng111@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Jane Dolan and Chris Lief:

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Thank you.
Helen Gallagher

Sent from my iPhone

From: [Geneva](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 10, 2024 11:58:50 PM

[Some people who received this message don't often get email from gperrine89@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Jane Dolan and Chris Lief:

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Thank you.

Sent from my iPhone

From: [Tony Whetstone](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 10, 2024 10:14:58 PM

Some people who received this message don't often get email from tonywhetstone@gmail.com. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

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

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Thank you.

Tony Whetstone

From: [Gustavo Alegria](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Thursday, January 11, 2024 9:39:14 AM

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Dear Jane Dolan and Chris Lief:

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Thank you.

~Gustavo Alegria

From: [M. Wright](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Thursday, January 11, 2024 4:59:22 PM

[You don't often get email from mlouw2@yahoo.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Jane Dolan and Chris Lief:

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Thank you.

Mary Lou Wright

Sacramento County resident 60 years

From: [B.C.](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Sunday, January 14, 2024 6:27:03 PM

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Dear Jane Dolan and Chris Lief:

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

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Thank you.

From: [Jay D](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Sunday, January 14, 2024 12:21:39 PM

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Dear Jane Dolan and Chris Lief: We need your eyes on this. Tia Jay D.

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.

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Thank you.
Jay D.

From: [Francesca Reitano](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Sunday, January 14, 2024 8:58:42 PM

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Dear Jane Dolan and Chris Lief:

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

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Thank you.

Francesca Reitano
Elmhurst Neighborhood
Sacramento

From: [Steven Whitehead](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Sunday, January 14, 2024 5:34:22 PM

[You don't often get email from smksgnl8@icloud.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Dear Jane Dolan and Chris Lief:

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

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Thank you.
Steve Whitehead

Sent from my iPhone

From: [Nicholas Piotrowski](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Monday, January 15, 2024 7:40:51 AM

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

Dear Jane Dolan and Chris Lief:

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

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Thank you.

Sent from my iPhone

From: [Michael Yanuck](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Monday, January 15, 2024 11:44:11 PM

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Thank you.
Michael Yanuck

Sent from my iPhone

From: [sacked](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 9:56:27 AM

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

Dear Jane Dolan and Chris Lief:

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Thank you.

Kathy Downey

Sent from my Verizon, Samsung Galaxy smartphone

From: [Lewis Kemper](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 10:58:09 AM

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Thank you.

Lewis Kemper

Lewis Kemper

From: [Gabriel Morales](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 7:21:18 AM

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

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Thank you.

Sent from my iPhone

From: [Russell Berridge](#)
To: [Woertink, Amber@CVFPB](#)
Cc: [Lief, Chris@CVFPB](#)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 7:09:18 PM

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

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Thank you.

From: [Mary Starkey](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 1:06:25 PM

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

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Thank you.

Mary Starkey, Sacramento County Resident

From: [DAVID ZEANAH](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Tuesday, January 16, 2024 7:12:52 PM

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Dear Jane Dolan and Chris Lief:

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Thank you.
David W. Zeanah

From: [Dana Miller-Blair](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Subject: opposition to Army corps of Engineers plans 3B, 4A and 4B American River, Sacramento county, California
Date: Wednesday, January 17, 2024 2:54:01 PM

You don't often get email from djmblair@gmail.com. [Learn why this is important](#)

January 17, 2024

I am writing to express my opposition to the Army Corps of Engineers plans 3B as well as and 4A and 4B along the banks of the American River in Sacramento County.

- 1 While I understand the need for flood control, I believe the project to reduce bank erosion can be done with far less disruption to the environment.
- 2 The areas in question are home to many species of birds, including the very rare, yellow-billed cuckoo. The planners of this project may not appreciate that most birds return to the very same locations year after year- sometimes to the very same tree! The American River, a wild and scenic river that runs through the city and county of Sacramento, is a jewel of natural habitat not only for a very wide variety of riparian and water birds, but for Western Pond Turtles, otters, beaver, coyote, the occasional bobcat, and fish, including both salmon and trout. Removal of vegetation and trees along the riverbank will permanently disrupt the habitat of birds and other species that make their homes there.
- 3 In addition, the high carbon footprint of the project will be a disaster for the area. The removal of trees, which utilize carbon dioxide in photosynthesis, the production of more greenhouse gases due to diesel machinery and trucks will result in a higher carbon load to the atmosphere.
- 4 The trees and other vegetation that are there currently stabilize the banks and their roots utilize groundwater and water from the river to reduce the risk of flooding and to use for photosynthesis.
- 5 I learned at the presentation on January 16, that the water temperature will be expected to rise with this project. This will adversely affect the salmon that breed in the river.
- 6 In addition to the high carbon footprint of the project, it was acknowledged that the project will produce dust and noise which will also disturb not only the wildlife, but the humans who live and recreate along the river. People enjoy the wild and scenic American River Parkway not only for its beauty, but for the quiet solace that it provides from the stresses of urban life. Fishermen, cyclists, hikers, dog walkers, students, birdwatchers, and photographers all enjoy the riparian forests along the banks of the American River on a daily basis. More than 5 million people visit and enjoy the parkway each year.
- 7 In addition, the American River Parkway is a commuting corridor for people who use the bike trail to get to and from work and school. These people, by virtue of cycling to work, are reducing the carbon footprint that they would otherwise generate if they were to drive to work or school. The disruption of the bike path, and the dust generated by the project is likely to force these bicycle commuters into cars for the duration of the project.
- 8 I question the need for this draconian approach to additional flood control. While I remember the floods of 1986, since then additional flood control measures have been taken at the Folsom Dam. I would favor a surgically precise approach to levee repair in which barges, not trucks, are used to approach the areas that require work.
- 9 I also question the need for riprap to be added to the floodplain as part of this project. Riprap, unlike river rock, will make it nearly impossible for new trees to grow. The mitigation measures presented on January 16 were wholly inadequate. They included adding riparian habitat to an area far removed

from the area of the work. As noted above, this does not result in a parkway that will be habitable to trees, plants, animals, and humans who depend on the parkway for their sustenance.

10 I expect that the work, if it proceeds as currently planned, will also result in loss of real estate value in the areas near the parkway. The parkway in its current form enhances the value of real estate along its banks. I have spoken to many who live next to the proposed project who are talking of moving because of the planned work.

11 We have seen the devastation that a similar project created near CSUS and River Park. We cannot tolerate another section of the Parkway being decimated in such a fashion.

I urge you to work to require that the plans be re-evaluated and to come up with a new plan that is surgically precise in nature targeting those areas that require work using barges to access the levees wherever possible.

Dana Miller-Blair

From: [Amy Pine](#)
To: [Woertink, Amber@CVFPB](mailto:Woertink.Amber@CVFPB)
Cc: [Lief, Chris@CVFPB](mailto:Lief.Chris@CVFPB)
Subject: Please Insist on a Better USACE Proposal for American River 3B Project
Date: Wednesday, January 17, 2024 8:21:17 AM

[Some people who received this message don't often get email from amypine76@hotmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

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Thank you.
Amy Pine

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 8:00 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov; Romine, Guy K CIV USARMY CESPK (USA)
Subject: [EXT] FW: Comments on SEIR for Lower American River Erosion Work - Wild and Scenic Rivers Act Compliance

From: Bill Brattain <bbrattain@hotmail.com>
Sent: Sunday, January 21, 2024 11:47 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: RichDesmond@saccounty.gov; SorgenKC@saccounty.gov; BellasE@saccounty.gov; Pat-Hume@saccounty.gov; Beth S <m.beth.s@hotmail.com> <m.beth.s@hotmail.com>; Kelvin.Lum@mail.house.gov; Bill Staack <bstaack@comcast.net> <bstaack@comcast.net>; Mark Berry <mb@deltacpm.com> <mb@deltacpm.com>; Peter Spaulding <petenyvtca@comcast.net> <petenyvtca@comcast.net>; Susan_Rosebrough@nps.gov; AmRivTrees@gmail.com; Gerald Djuth <acuflwr@msn.com>; joshjhthomas@gmail.com; Kim Schwab <kschwab52@gmail.com>; MHI Gtkpr <mhigtpr@gmail.com>; Avery, William E <averyw@csus.edu>; John Cameron <john@johnacameron.com>
Subject: [Non-DoD Source] Comments on SEIR for Lower American River Erosion Work - Wild and Scenic Rivers Act Compliance

Dear Army Corps & DWR,

My name is William Brattain, P.E., and I am submitting comments on the SEIR for the Lower American river erosion work proposed in the above-referenced document. I have already submitted three sets of previous comments on this document by email that focused on the flow velocity of the river, the distance of the heritage oak trees at the Larchmont Park from the base of the levee, and the riverberm thickness at Larchmont Park River Mile 10.4-10.5. These comments focus on compliance with the federal Wild and Scenic Rivers Act for proposed work under Contract 3B and Contract 4A, as well as work done under previous contracts on areas downstream such as the work done at Sacramento State University.

The SEIR states in several sections that the proposed work along the lower American River for Contract 3B and 4A needs to comply with the federal Wild and Scenic Rivers Act given that the Lower American River is a designated wild and scenic river under both federal and state law. The federal Wild and Scenic Rivers Act of 1968 (the Act) states that rivers designated under the act shall be preserved in free-flowing condition and that they and their immediate environment

shall be protected for the benefit and enjoyment of present and future generations. The Act defines “Free-flowing” in Sec. 16 of the Act: “as applied to any river or section of a river means existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway”.

Interestingly enough, the SEIR fails to mention this section of the Act that clearly prohibits rip-rapping of the banks of a designated wild and scenic river. It is not mentioned in any portion of the document, and there is no discussion of why the proposed project under Contract 3B, Contract 4A, or any previous contract already completed is in compliance with the Act given the rip-rapping of the river banks when that is clearly prohibited for a designated wild and scenic river under the Act. I have not fully researched the state Wild and Scenic Rivers Act, or the American River Parkway Plan, but would imagine they have similar prohibitions on rip-rapping. Perhaps other commenters could provide more research on that and comment separately.

2 I have included screenshots of the appropriate sections of the SEIR and the federal Wild and Scenic Rivers Act. Clearly, the proposed project is indirect violation of federal law, and I am certain that a court injunction to halt the project will be forthcoming either by me or others working on the legal aspects of the project. The project proponents will also be left to explain why they were allowed to violate the federal law and likely state law as well by installing riprap along the banks of the Lower American River under previous contracts.

Thank you,

William Brattain, P.E.

2.2.2 Applicable Laws, Regulations, Policies, and Plans

Federal

National Wild and Scenic Rivers Act (16 U.S.C. 1271 et. seq.)

The Wild and Scenic Rivers Act of 1968 was enacted to preserve selected rivers or sections of rivers in their free-flowing condition to protect the quality of river waters and to fulfill other national conservation purposes. The Lower American River, below Nimbus Dam, has been included in the Federal Wild and Scenic Rivers system since 1981. The Lower American River was listed for having extraordinary anadromous fishery resources and recreation. The act applies to the parts of the Proposed Action along the American River, specifically all areas disturbed by implementation of the Proposed Action withing the Parkway associated with American River Erosion Contract 3B, American River Erosion Contract 4A, and the ARMS.

Sections 9 and 10 of the Rivers and Harbors Appropriation Act of 1899 (33 U.S.C. §§ 401 and 403)

Section 9 of the River and Harbors Appropriation Act requires Congress's consent to build a ridge, causeway, dam, or dike over or in any port, roadstead, haven, harbor, canal, navigable river, or other navigable water of the United States. It also requires the Secretary of Transportation, Chief of Engineers and Secretary of the Army to review and approved plans associated with these projects. Section 10 of the River and Harbors Appropriation Act prohibits construction of any wharf, pier, boom, weir, or other structures in any port, roadstead, haven, harbor, canal, navigable river, or other water of the United States, outside established harbor lines. The Rivers and Harbors Appropriation Act of 1899 applies to the parts of construction work within navigable waters at American River Erosion Contract 3B, ARMS, Sacramento River Erosion Contract 3, and SRMS.

State

California Wild and Scenic Rivers Act (PRC Section 5093.545h.)

The California Wild & Scenic Rivers Act of 1972 was put in place to preserve certain rivers that have extraordinary recreational scenic fishery or wildlife values. The Lower American River

WILD AND SCENIC RIVERS ACT

[Public Law 90–542; Approved October 2, 1968]

[As Amended Through P.L. 116–9, Enacted March 12, 2019]

【Currency: This publication is a compilation of the text of Public Law 90–542. It was last amended by the public law listed in the As Amended Through note above and below at the bottom of each page of the pdf version and reflects current law through the date of the enactment of the public law listed at <https://www.govinfo.gov/app/collection/comps/>】

【Note: While this publication does not represent an official version of any Federal statute, substantial efforts have been made to ensure the accuracy of its contents. The official version of Federal law is found in the United States Statutes at Large and in the United States Code. The legal effect to be given to the Statutes at Large and the United States Code is established by statute (1 U.S.C. 112, 204).】

AN ACT To provide a National Wild and Scenic Rivers System, and for other purposes.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That 【16 U.S.C. 1271】 (a) this Act may be cited as the “Wild and Scenic Rivers Act”.

(b) It is hereby declared to be the policy of the United States that certain selected rivers of the Nation which, with their immediate environments, possess outstandingly remarkable scenic recreational, geologic fish and wildlife, historic, cultural or other similar values, **shall be preserved in free-flowing condition**, and that they and their immediate environments shall be protected for the benefit and enjoyment of present and future generations. The Congress declares that the established national policy of dam and other construction at appropriate sections of the rivers of the United States needs to be complemented by a policy that would preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.

included in the system is a free flowing stream and the related adjacent land area that possesses one or more of the values referred to in section 1, subsection (b) of this Act. Every wild, scenic or recreational river in its free-flowing condition, or upon restoration to this condition, shall be considered eligible for inclusion in the national wild and scenic rivers system and, if included, shall be classified, designated, and administered as one of the following:

(1) **Wild river areas**—Those rivers or sections of rivers that are free of impoundments and generally inaccessible except by trail, with watersheds or shorelines essentially primitive and waters unpolluted. These represent vestiges of primitive America.

(2) **Scenic river areas**—Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

(3) **Recreational river areas**—Those rivers or sections of rivers that are readily accessible by road or railroad, that may have some development along their shorelines, and that may have undergone some impoundment or diversion in the past.

SEC. 3. [16 U.S.C. 1274] (a) The following rivers and the land adjacent thereto are hereby designated as components of the na-

SEC. 16. [16 U.S.C. 1286] As used in this Act, the term—

(a) “River” means a flowing body of water or estuary or a section, portion, or tributary thereof, including rivers, streams, creeks, runs, kills, rills, and small lakes.

(b) “Free-flowing”, as applied to any river or section of a river, means existing or flowing in natural condition without impoundment, diversion, straightening, rip-rapping, or other modification of the waterway. The existence, however, of low dams, diversion works, and other minor structures at the time any river is proposed for inclusion in the national wild and scenic rivers system shall not automatically bar its consideration for such inclusion: *Provided*, 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.

(c) “Scenic easement” means the right to control the use of land (including the air space above such land) within the authorized boundaries of a component of the wild and scenic rivers system, for the purpose of protecting the natural qualities of a designated wild, scenic or recreational river area, but such control shall not affect, without the owner’s consent, any regular use exercised prior to the

2020

As Amended Through P.L. 116-9, Enacted March 12, 2019

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:58 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Cathy <ccreeggan@comcast.net>
Sent: Saturday, January 20, 2024 10:34 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:57 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] stop: US Army Corp of Engineers (USACE) Contract 3B

From: sheila adrian <sheila_adrian@yahoo.fr>
Sent: Saturday, January 20, 2024 10:14 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] stop: US Army Corp of Engineers (USACE) Contract 3B

1 Please put a stop to this project (US Army Corp of Engineers (USACE) Contract 3B) so unpopular and a disgrace, environmentally. You will be doing long-lasting harm to a haven of nature.

Sheila Adrian
Interprète de conférence français/anglais

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:56 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Extension of comment period

From: Tom <tom@tomcuster.com>
Sent: Saturday, January 20, 2024 9:59 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Extension of comment period

Hello

1 Writing to let you know I support the extension of the Sacramento Count Regional Parks request to extend the comment period on Army Corp of Engineer proposal. The true need for this construction is not clear.

Thank You

A handwritten signature in black ink, appearing to read "Tom Custer", with a stylized flourish at the end.

Tom Custer

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:55 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Austen Consulo <austenconsulo@gmail.com>
Sent: Friday, January 19, 2024 8:36 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: publiccommentarcf16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.

Sent via the Samsung Galaxy S22 Ultra 5G, an AT&T 5G smartphone
Get [Outlook for Android](#)

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:54 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Need Extension on the 45 Day Comment Period for the Draft Supplemental EIS/Supplemental EIR (SEIS/SEIR) for American River Parkway Contract 3B

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

From: Mary E Tappel <marye.tappel@jps.net>
Sent: Friday, January 19, 2024 8:09 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Need Extension on the 45 Day Comment Period for the Draft Supplemental EIS/Supplemental EIR (SEIS/SEIR) for American River Parkway Contract 3B

This inadequate 45 Day Comment Period for the Draft Supplemental EIS/Supplemental EIR (SEIS/SEIR) for American River Parkway Contract 3B from Dec. 22, 2023 through Feb. 5th, 2024 contains no less than 5 Holidays: Christmas Eve Day (Dec. 24th), Christmas Day (Dec. 25th), New Years Eve Day (Dec. 31st), New Years Day (Jan. 1st, 2024) and Dr. Martin Luther King, Jr. Day (January 15th, 2024).

1 Many people had pre-planned Holiday travel out-of-state, prior high priority family time commitments for some or all of these holidays, 'Use it or Lose it Vacation Time' at the end of the 2023 calendar year, etc. This major Holiday loaded Comment Period does not present itself as a 'Good Faith' effort by the ACE to allow adequate time for public comments on these very lengthy and impactiul Contract 3B documents.

Any desire to allow the general public adequate and reasonable response time to these extremely complex and lengthy SEIS/SEIR documents, figures, appendices, and earlier related USACE American River Parkway Erosion Prevention contracts clearly requires an extension of this limited 5 Holiday included official Dec. 22nd through Feb. 5th Comment Period.

Please show the general public some respect for our dedication to trying to help keep our essential natural resources within our very needed Wild and Scenic River designated American River Parkway. Let us have an Extension to this Public Comment Period.

Thank you very much for your consideration and work efforts -

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:54 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Starlight Murray <smurray@sanjuan.edu>
Sent: Friday, January 19, 2024 3:50 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

To whom it may concern.

I am extremely concerned & upset by the devastation & consequences of the current plan.

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

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

Thank you.

Starlight Murray

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: Tanya Pruitt <nanacook2012@gmail.com>
Sent: Friday, January 19, 2024 3:06 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 22, 2024 7:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

From: Cary Hart <chart1217@comcast.net>
Sent: Friday, January 19, 2024 3:00 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

Sent from my iPhone

From: Lief, Chris@CVFPB
Sent: Friday, January 19, 2024 5:56 PM
To: Calles, Jennifer@CVFPB
Cc: Woertink, Amber@CVFPB
Subject: FW: USACE Proposal 3B

From: Ellen Ganz <ganz.ellen@gmail.com>
Sent: Friday, January 19, 2024 11:33 AM
To: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: USACE Proposal 3B

You don't often get email from ganz.ellen@gmail.com. [Learn why this is important](#)

Dear Chris Lief,

- 1 I am writing to ask that you please advocate for a less destructive and more targeted approach to the US Army Corps of Engineers (USACE) Contract 3B. 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. Longtime Sacramento residents know this- this 3B area is not at risk for flooding and no significant flood has come close to threatening the levee in this area. This project puts us MORE at risk for flooding due to removing the root system that holds the levee in place, and inserting rock that will inevitably shift and need to be maintained.
- 2 The project as proposed will cause REAL, KNOWN HARM to our children. The public plan submitted says there will be significant impact to the air quality of the neighborhood. The access routes use roads that pass directly by O.W. Erlewine Elementary school. Many young children and babies live in this neighborhood. I am terrified as to what the effects of diesel trucks, the fumes and the dust will have on our children. I am asking that there be mitigation efforts, such as re-routing trucks away from the elementary school, using smaller equipment, and anything else that can be done to reduce the dust, noise, and smog that will be in our neighborhood.
- 3 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, such as in-place use of stabilizing vegetation,
- 4 and biotechnical techniques as encouraged by the National Park Service. We chose to live here to be by the park and the river, and we will be devastated if this plan proceeds.

Thank you for your time and attention to this matter,

Ellen Ganz, mother to Joseph "JJ" Ganz, age 8, second grader at O.W. Erlewine Elementary School

From: Woertink, Amber@CVFPB
Sent: Thursday, January 18, 2024 12:50 PM
To: Calles, Jennifer@CVFPB
Cc: Lief, Chris@CVFPB
Subject: FW: Please help make USACE data public!

Follow Up Flag: Follow up
Flag Status: Completed

From: Eliza Morris <eliza.morris@gmail.com>
Sent: Thursday, January 18, 2024 7:28 AM
To: Woertink, Amber@CVFPB <Amber.Woertink@CVFlood.ca.gov>
Cc: Lief, Chris@CVFPB <Chris.Lief@cvflood.ca.gov>
Subject: Please help make USACE data public!

Some people who received this message don't often get email from eliza.morris@gmail.com. [Learn why this is important](#)

Dear Jane Dolan and Chris Lief:

1 I am sure you have heard from many people already, but I am also very concerned about the Army Corp of engineers work planned for three stretch of the river by Larchmont Park. We are lucky that we have been able to see the results by Sac State and have an idea of what we are going to get after the three years, a final product is so much more like a canal and so much less like the river we all love.

2 I have a lot of comments, but my immediate concern is that there doesn't seem to be any segment by segment analysis showing that what they are choosing to do by us is best. They provided that for the stretch by Sac State, and in that document said they would conduct similar analysis on our segment. But it is no where to be found.

3 I went to a public meeting for this and it seems like they really have no concrete evidence supporting the need for this other than the vague comment that we are in a flood zone... Of course we are... We live next to a river! What concerns my neighborhood though is that for three years they plan to close our access to the parkway that we all walk along. They plan to have their "staging area" for their heavy equipment on a portion of the park that is next to the elementary school! That area will be next to our playground! They plan for "mitigation", but almost everything says that it's terrible... But unavoidable. They will supposedly replant the vegetation that they are going to completely bulldoze, but how do you plant back the 150 year old heritage oaks!

4 Also, before you just jump onto the Army Corp bandwagon. They have provided no specific technical analysis for our area demonstrating the need for this and that ripping out the nearly 100ft x miles long stretch of trees and shrubs is better than leaving it.

I have lots of picture sand would be happy to give you more info. But you can also find a lot here: www.americanrivertrees.org.

Warmly,
Eliza Morris

From: Sutton, Drew
Sent: Tuesday, January 23, 2024 9:29 AM
To: Dorff, Becky
Subject: FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

Follow Up Flag: Follow up
Flag Status: Flagged

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

From: elwoodnnjr@gmail.com <elwoodnnjr@gmail.com>
Sent: Tuesday, January 23, 2024 8:19 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

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

Thank you.
Norm Niver Jr.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 24, 2024 2:06 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Opposition to Tree removal along American River
Attachments: IMG_3805.jpg

From: Andrea Higginbotham <abrusca@gmail.com>
Sent: Wednesday, January 24, 2024 1:17 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Opposition to Tree removal along American River

To Whom it May Concern,

I wanted to vehemently oppose the plan to deforest the American River along Rio Bravo and Mayhew areas.

I am originally from Southern California, my family moved here five years ago in large part to enjoy the beauty of Northern California. We bought our home because it was close to an elementary school and mere minutes away from the parkway and river access. My entire family enjoys long walks and bike rides along the American River. It is a true gem and a MAIN source of pride in where we live.

Known as the "Rio Bay" locally, the water directly in front of Rio Americano has been a special place for my kids and I. Several years ago we were enjoying a walk and ended up running into a mother river otter and several of her pups happily feeding on many fish. We watched in awe and would continually go back and occasionally catch glimpse of possibly them or other otters. The idea of the tree line changing here is the worst possible scenario.

When I drive near Sac State and see the absolute destruction along the river I get a visceral, apocalyptic feeling. No project should remove the wild and serene setting, the natural habitat to so many animals.

The impact of this project will be enormous. It should be avoided at all costs.

The reason to live in this area is the gem of the American River. No upgrades should destroy this protected area. Please protect it.

Sincerely,

Andrea Higginbotham

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 24, 2024 7:51 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

From: patrick kenney <pkfairlane67@yahoo.com>
Sent: Tuesday, January 23, 2024 5:18 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] URGENT REQUEST FOR EXTENSION TO REVIEW PERIOD FOR ARCF SEIS/SEIR

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

Thank you.

[Sent from Yahoo Mail on Android](#)

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Thursday, January 25, 2024 9:27 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil; Romine, Guy K SPK
Subject: [EXT] FW: American River Proposed Tree Removal

From: Greg Schmidt <gssempire@aol.com>
Sent: Thursday, January 25, 2024 9:22 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Fw: American River Proposed Tree Removal

You don't often get email from gssempire@aol.com. [Learn why this is important](#)

To Whom it May Concern,

1 My Name is Greg Schmidt. I am a long time resident of Sacramento. I live 2 blocks from the American River near Howe Avenue. I wanted to express my concern on the Army Core improvements taking place along the river. In watching what has been done so far, it appears that they are removing numerous trees that do not necessarily need to be removed. These trees provide a root system that helps stabilize the soil and do not pose any erosion hazard unless they are around a bend or other area where there is an unusually swift current greater than the actual flow of the river.

This proposed removal is not only unnecessary, but also DESTROYS the natural beauty of the parkway. I would like to be notified of any public hearings so I can be present to hear the rational for this tree removal and voice my objections to this proposal.

Sincerely,

Greg Schmidt

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 25, 2024 8:27 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Rio Linda proposed Bank erosion

From: Greg Sanchez <mastermasongreg@gmail.com>
Sent: Wednesday, January 24, 2024 5:08 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Rio Linda proposed Bank erosion

I am very concerned with the proposed bank erosion project on the American River Parkway.

Does the Army Corps. Of Engineers understand the vital role that those trees' root systems play in erosion control?

Have they conveniently forgot that the American River is part of the National and State 'Wild and Scenic River System' established by Bureau of Land Management, and portions are designated as a "Protected Area" in the American River Parkway Plan?

This project, like so many others, seems incredibly short sighted. With more than 5 million visits annually to the American River Parkway - which is more than Yosemite gets, mind you - the project will diminish both our parkway's beauty and its recreational values.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 25, 2024 8:28 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Opposed to the Bank Erosion Plan

From: Troy Golden <goldenrayssolarcleaning@gmail.com>
Sent: Wednesday, January 24, 2024 5:16 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Opposed to the Bank Erosion Plan

I am very concerned with the proposed 'Bank Erosion Project' on the American River Parkway.

Does the Army Corps. of Engineers understand the vital role that those trees' root systems play in erosion control?

Have they also conveniently forgot that the American River is part of the National and State 'Wild and Scenic River System' established by Bureau of Land Management, and that portions are designated as a "Protected Area" in the American River Parkway Plan?

This project, like so many others, seems incredibly short sighted. With more than 5 million visits annually to the American River Parkway - which is more than Yosemite gets, mind you - the project will diminish both our parkway's beauty and its recreational values.

Troy Golden
Concerned citizen

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Friday, January 26, 2024 12:22 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: A story I'd like to share...

From: Kelly Moss <kelly@thesecondchildhood.net>
Sent: Friday, January 26, 2024 9:58 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: A story I'd like to share...

You don't often get email from kelly@thesecondchildhood.net. [Learn why this is important](#)

I'd like to submit my public comment in the form of a story:

I was walking a 2.5 mile stretch along the American River Parkway the other day, like I do everyday.

But on this day, I saw three tough-looking older teen boys walking toward me on the trail.

My body tensed up.

When we met on the trail, I smiled...

And they proceeded to talk to me, very excitedly, like little boys, about their adventure down at the river!

My body relaxed.

One of them told me how the water had risen up and soaked their shoes and pant legs ('accidentally on purpose,' I guessed ;)).

Another told me that a bird had flown so close to his face that it had almost touched him!

They were so thrilled with their nature excursion, their faces awash with pure joy and grinning ear-to-ear.

After we parted ways, I was also grinning ear to ear, filled with joy. In fact, I have not been the same since.

Their delight was contagious!

I was amazed at how these street-savvy looking young men had been transformed into playful little children by their encounter with the American River.

I ask you, what problems on this planet wouldn't be solved with the males of our species developing a sense of wonder and awe towards the natural world?

Towards life?

Towards women?

Towards their own capacity for delight?

My appreciation for this little strip of land grew after that encounter, as I have come to value it on a new level.

This area is not precious only to the creatures who live here, nor only to the runners, strolling families and dog walkers, but to the city as a whole -- because each one of us who is touched by the magic of this place goes on to touch others with it as well.

The value of this space for residents human and otherwise is immeasurable. It can not be replaced. There is no substitute.

We must protect it and other wild places as much as possible.

So let's play with the solutions proposed for the levee upgrades, until we find a way that works for everyone.

Because while we do need flood protection, what our souls long for most is the return to innocence I saw in those three young men that day.

The tragedies we have all experienced and witnessed recently make it evident to me that humanity is desperate for a second childhood.

And for some of us, our first.

We can't miss this opportunity.

- Kelly Moss

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 26, 2024 7:56 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments to Army Corp of Engineers Environmental Documents - Contract C3B
Attachments: Letter to Rich Desmond on Erosion Project.docx; Letter to CRPD on Erosion Project.docx

From: etak123@aol.com <etak123@aol.com>
Sent: Thursday, January 25, 2024 9:07 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Cc: Rich Desmond <richdesmond@saccounty.gov>; McCarthy-Olmstead. Vanessa <mccarthy-olmsteadv@saccounty.gov>
Subject: [Non-DoD Source] Comments to Army Corp of Engineers Environmental Documents - Contract C3B

RE: Comments to the Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report for the American River Common Features 2016 Flood Risk Management Project and specifically to the project component Contract C3B South, Site 4-1 (approximately 1.5 miles long) located generally along the south side of the American River from Watt Avenue to nearly the Mayhew Drain.

I'm retired and have lived here going on 27 years now (10 years now in retirement). I have a background in business finance, so my comments to this highly technical document may lack the technical expertise of the hydrologists, biologists, engineers, and other specialists, but I write from the heart and with some experience after living here for so long. I am writing in spite of many people saying to me that only technical comments to the environmental documents will be considered. "Heart comments" should be considered too.

The above referenced river bank flood erosion project is going to have those of us who live in my neighborhood feeling like we're under siege. Basically, the United States Army Corp of Engineers (USACE) is planning to fence off the river and the parkway in my neighborhood for at least 2 years, denude the south side of the river my neighborhood borders, destroying nearly all vegetation and

displacing all the wildlife there destroying the urban forest many of us moved here to enjoy, and that's just on a portion of the north side of my neighborhood.

Also, along the north side of my neighborhood is Larchmont Community Park, our neighborhood's major park facility and the project will use the northern portion of the park for a staging area, further reducing our green recreational space and then the staging area will have to be accessed through a local street, not designed for the onslaught of heavy construction equipment. This staging area will remain in place for at least the 2 years this project is expected to take, and there will be mature trees lost on this park site that will take many years for any replanted trees to replace in size.

On the east side of my neighborhood lies the Mayhew drain and it's the roadway along the drain this proposed project will utilize to move an unbelievable amount of super heavy equipment in and out for those 2+ years heavily impacting the houses backing up to this drain. The heavy construction traffic will then continue along the levee. It appears to me the use of the drainage roadway will require the pedestrian pathway over the Mayhew drain, connecting Linda Rio Drive over the drain will have to be closed. I see no reference to that access loss in the environmental documentation.

On the south and east sides of my neighborhood, along Folsom Boulevard, La Riviera Drive, and our local street, Rogue River Drive, are designated as possible "haul routes". Rouge River is just a local street! So, we are surrounded by the components of this planned project.

The construction schedule in the environmental documents indicates the construction traffic will happen 6 days a week over several months of the year, up to 13-14 hours per day, and the project will last at least 2 years! The environmental documents are clear...the impacts that will be created to my neighborhood with traffic, vibration, noise, dust, air quality, environmental destruction, wildlife displacement is all pretty much described as "direct, significant, and unavoidable". In other words, we'll be under siege for years from this project.

The amount of destruction this project proposes is a bit overwhelming to me and many others. And this is all in the name of "flood protection". And it's a bit insulting to me anyway to read in the environmental documents that these impacts are all just "temporary". The documentation I believe minimizes the impacts. It's readily apparent the urban forest we all love and made a choice to live next to is not going to come back in its' current state in my lifetime after this project is completed and given what your proposal is, it will never come back the way it is now. And people wonder why there is so little trust in government.

While the public notification for this project has met the letter of the law I suppose, it should be noted most in my neighborhood (me included) were not aware of this project until very recently. And the fact the environmental documentation was released days before Christmas, when many governmental offices go on short staffing for the holidays doesn't engender any trust in this process.

I don't want to lose the urban tree forest nor do I want to see the wildlife living there displaced into my neighborhood. I believe a more targeted, less destructive approach to erosion control in this area can be done.

The USACE claims this planned erosion 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 USACE 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.

And, I remember the USACE pushing to denude the levees in Sacramento after the Katrina flooding in New Orleans, and our larger Sacramento Community fought that effort. This feels a bit like a backdoor way to achieve that old goal.

I am asking for the footprint of this project to be downsized. I want more trees to remain than what is planned. I want C3B to be completely re-thought and no work should proceed until my neighbors have all of their questions on this project answered. There seems to be little recognition of how much stability the existing tree roots offer the river banks. I will note whenever I've seen river bank disturbances in our area from prior construction projects, there has been "rills" formed from rain run off along the banks in the construction areas.

There seems to be little recognition of how important this urban forest is not to just flood protection, but to the general recreational enjoyment of thousands of people who flock to the parkway.

There is little by the way of documentation that shows what the exact replanting plan is. But based on photos I've seen from the USACE's two virtual public meetings in January, it appears as though no actual trees are replanted (looks like replanting consists of seeds or tiny little seedlings). And it didn't escape my notice the pictures in those two presentations failed to show what that area looked like before the work was initiated, and that the "years later" photos show the highest tree canopies are actually coming from trees located on Sac State campus, not along the river bank. Anyone else in Sacramento taking out certain trees is required to replace them with trees of a certain size and maturity. Why isn't that the case for this project? I am asking for more sizable replanting of removed trees for this project.

I have heard both SAFCA engineers and USACE public information officials state in ten years the area will basically look the same as it does now with regard to vegetation/trees. That is simply untrue. It will never look the same and certainly not within 10 years. The rock you will lay will in fact preclude certain tree and vegetation species to flourish again.

As for using Larchmont Community Park as a staging area, I object to adding any access to the river levee from Larchmont Community Park. Page 3-48 of the environmental document says “the main access points to the levee would include....Larchmont Community Park”. And, page 3-49 says “Larchmont Park would be accessed from the levee or Rouge River Drive”. The Sacramento Area Flood Control (SAFCA) about 20 years ago looked at adding an access ramp to the levee in our neighborhood at 2524 Rio Bravo Circle, then after our neighborhood successfully fought that effort, SAFCA looked to add one in Larchmont Community Park. That idea was eventually abandoned by SAFCA, but again, this feels like a backdoor way to achieve that old goal. If a ramp is built from the levee into the park, I would expect that ramp to be removed at the end of the project and I would expect at least 24-inch box trees to be planted in the park.

Still addressing using Larchmont Community Park as a staging area, Appendix D of the environmental document, under 18-2, the response from states in part: “The project footprint has been updated since the NOI was released and now shows that haul traffic would be limited to the east end of Larchmont Community Park”. I believe that is a mistake in the document, and that instead should say “west” end of Larchmont Community Park via Rouge River Drive.

12

Still addressing using Larchmont Community Park as a staging area, I want to note the existing cement stairs leading from the east end of the park up the levee should be protected during this construction project. Those stairs are a vital to the safe access of the parkway from my neighborhood. The American River Flood Control District prefers no stairs along the levee to facilitate mowing of the levees, but those stairs must remain in-tact and accessible to our neighborhood.

Still addressing Larchmont Community Park, I have attached a separate letter to the Park District I submitted on December 27, 2023 outlining other concerns I hope are considered when a temporary construction easement agreement is entered into for use of a portion of the park for a staging area (see attached letter).

It appears to me the environmental documents address “selected elements” of wildlife, but I haven’t been able to find much in the documentation about what is to happen to the large amount of displaced non-domestic wildlife that will occur from this project. When the slurry wall project for the levee fortification project was done in my neighborhood, many, many animals were displaced into the streets, drainage systems, and our yards in our neighborhood and many of these were removed by private trapping firms that neighbors had to pay for.

13

I have heard the USACE and SAFCA representatives state the wildlife will move upstream and downstream of this project area, but it’s ludicrous to think they won’t move into our neighborhood, just like they did when the levee slurry wall project was constructed years ago. Sacramento County animal control does not typically respond to non-domestic animal calls. My neighbors were the ones to foot the bills for hiring private contractors to relocate the rattle snakes, skunks, possums, raccoons, and myriad of other non-domestic, non-endangered wildlife that was displaced when the slurry wall project was initiated. And this project is by far

more destructive to habitat than the slurry wall project was. What is the mitigation for this? It appears there are no real mitigation measures being considered for this but just the magical thinking the displaced wildlife will stay upstream and downstream (moving upstream is an issue here due to the Mayhew drainage canal).

14 I see no mention of the “wind tunnel” effects that naturally occur along the American River. When the big New Year’s Eve storm hit one year ago, the excessive wind whips freely along the American River, but that wind is mitigated by the large tree canopy there, offering some protection to my neighborhood from the high winds. Without that large mature tree canopy, my neighborhood will be subject to more wind damage during these high wind events. I guess we just chalk that up to still another “direct, significant, and unavoidable” impact of this project, but it seems like this deserved some attention in the environmental documentation.

15 As for the eventual maintenance of the replanting that is planned for this massive project, I will note SAFCA has a dismal record in my neighborhood of truly finishing up these areas so they return to a natural state after the maintenance period is over. For example, their subcontractors disappear the day the maintenance period is over typically leaving the temporary construction fencing (no longer used and abandoned), any irrigation tubing (no longer used and abandoned), and runoff prevention material (that’s supposed to degrade over time on its own but seldom does). Contracts should be clear about removing all of these items returning the areas to their natural state. If rain water runoff creates rills or other erosion areas, additional replanting and corrective measures should be incorporated into the project until the areas disturbed are fully safe from erosion dangers and until the replanted areas have time to mature. How long will replanting contracts and maintenance contracts be good for?

Also, the revetment areas from 2011 were never returned to their original states. The rocky banks aren’t accessible by foot or kayak anymore, and the planting material did not match what was there before the work. It’s frustrating to see the 2011 revetment areas located in C3B and be told they are like they were before the 2011 work, when they in fact have been forever changed.

16 County Transportation is in charge of roadways and County Water Resources is in charge of the Mayhew Drain area and so I have written my Supervisor, Mr. Rich Desmond to determine what conditions will be or have been placed on this project by the County (see attached letter). There should be motion sensors installed for the homes that back up to the Mayhew Drain roadway, as well as the river levee. These older homes must be protected against the vibrations of the heavy equipment that will come and go in these areas.

17 I don’t want the very reason I’ve lived in my home for so many decades to be obliterated in this over-reaching destructive project. Your proposal needs to change to reflect the concerns of myself and my neighbors. I believe we can have flood protection without parkway devastation. We deserve a targeted approach in the area of C3B, not a “one size fits all” concept. Please don’t destroy this amazing urban forest. It’s the heart and fabric of our community.

Kate Rosenlieb

Attachments:

Letter from me to Cordova Recreation and Park District

Letter from me to my elected official, Supervisor 3rd District Rich Desmond

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 26, 2024 7:53 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] tree removal

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

From: bream <bream@omsoft.com>
Sent: Thursday, January 25, 2024 6:54 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] tree removal

1 | I don't believe the tree removal is the answer to anything.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, January 25, 2024 11:29 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Fw: American River Proposed Tree Removal

From: Greg Schmidt <gssempire@aol.com>
Sent: Thursday, January 25, 2024 9:23 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Fw: American River Proposed Tree Removal

To Whom it May Concern,

My Name is Greg Schmidt. I am a long time resident of Sacramento. I live 2 blocks from the American River near Howe Avenue. I wanted to express my concern on the Army Core improvements taking place along the river. In watching what has been done so far, it appears that they are removing numerous trees that do not necessarily need to be removed. These trees provide a root system that helps stabilize the soil and do not pose any erosion hazard unless they are around a bend or other area where there is an unusually swift current greater than the actual flow of the river.

- 1 |
- 2 | This proposed removal is not only unnecessary, but also DESTROYS the natural beauty of the
- 3 | parkway. I would like to be notified of any public hearings so I can be present to hear the rational for this tree removal and voice my objections to this proposal.

Sincerely,

Greg Schmidt

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 26, 2024 3:47 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Do not destroy vegetation on the American River Parkway by USACE Project 3B

From: Maggie Coulter <mcoulter@dcn.org>
Sent: Friday, January 26, 2024 3:21 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Do not destroy vegetation on the American River Parkway by USACE Project 3B

I am horrified at the plans of the Army Corps of Engineers to destroy trees and vegetation along the American River. What the Corps has done to the stretch of the river by Sacramento State University is appalling.

I share the concerns articulated by other concerns taxpayers listed below.

This project needs to be scrapped immediately and completely revamped to protect the existing trees and vegetation.

Maggie Coulter
Sacramento

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 stifle tree growth. Heritage trees would be forever lost.
- The planting benches being proposed on top of the launchable rock toes and trenches will likely collapse ("launch") when the launchable rock toes and trenches eventually launch. No provisions or commitments have been made to replace lost planting benches.

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

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

4. Impact on Wildlife and Critical Habitats:

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

5. Recreational Access:

- This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths in

the forest and beaches along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Why should we think that the Corps will do anything different than at River Park, where all of these features such as mature trees, beaches, footpaths, etc., appear to have been destroyed? Sac State is used as a restoration example, but we know of no beaches, footpaths, fishing access points there, either. Why should we trust that 3B will be different when even the SEIS/SEIR does not address these issues?

- Installation of miles of angular rock (riprap) will make river access dangerous along large stretches of river, and will greatly impede swimming, fishing, and deployment of watercraft such as kayaks. This will be a permanent and significant loss of irreplaceable recreational amenities to the community that is not accounted for in the SEIS/SEIR, despite promises by the Corps in 2016 to address these significant issues.
- The permanent loss of mature trees, beaches, river access points, footpaths, and other recreational amenities is not “less than significant” as stated in the SEIS/SEIR. The Corps needs to document these losses and redo the SEIS/SEIR to account for them, including proposals to modify the project where possible to minimize losses.
- The public has a right to know how specific recreational amenities will be affected by this project. The level of detail in the SEIS/SEIR makes it impossible for the public to see what will be done, and all we can assume is everything in 3B upstream of Watt Avenue on the south side will be ripped out like at River Park. The public has a right to know the details at this stage of review and should not be required to “trust” the Corps. We want the Corps to document and justify specifically which of our trails, trees, beaches, fishing access, and riparian forest must be destroyed to keep us safe from floods, and how much of that destruction will be replaced, versus what will be lost permanently given current design.
- What mitigation for lost beaches, trails, forests, etc. will there be? The SEIS/SEIR does not discuss the loss of these features, so it also inappropriately fails to discuss mitigation for permanent impacts to features that the Corps cannot replace onsite. If beaches or trails are lost forever onsite, will other beaches or trails be installed?

6. Mental Health and Vegetation

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

- Trees often serve as gathering places and contribute to the sense of community. The removal of trees can alter the social dynamics of an area, potentially reducing opportunities for social interaction and community engagement. Social connections are important for mental health, and changes in community dynamics can have psychological implications.

7. Cultural Restoration and Inclusion:

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

8. Air Quality:

- For California/CEQA, diesel exhaust particulate matter (Diesel PM) is a carcinogen, with a cancer potency value from the Office of Environmental Health Hazard Assessment (OEHHA), and OEHHA reports that between the ages of 2 to 9 years old, children are three times more sensitive to a carcinogen than adults. (Between third trimester and 2 years old, they are 10 times more sensitive).
- The project is large, with over 100 daily truck trips at each site and staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under CARB's Truck and Bus Regulation. The USACE mitigation measures should require much cleaner trucks -- 2014 or newer or, better yet, electrics.
- Even where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)).
- Although construction of the Project would occur over two years, each site would have over 100 truck trips at each location that travel through residential communities. 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](#)). USACE should have prepared a construction health risk assessment (HRA), to provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact.
- Using quarry rocks from unspecified quarry sources has not been adequately addressed for concerns that the rocks may contain asbestos content (given the prevalence of serpentine rocks in surrounding foothill sources). Dust from hauling and dumping asbestos-containing rocks with a quarter mile of a school requires further environmental impact analysis.

9. Environmental Justice (EJ):

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

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, January 26, 2024 2:17 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Mary Wing <maryjwing@aol.com>
Sent: Friday, January 26, 2024 11:02 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

1 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 decision and plan pushed thru back in 2016 was not re-reviewed after last years rain and flooding in the area. The levee held without destruction. Why can't the reinforcement be completed either within the river without removing every plant, tree & wild life totally wiped out.

Why can't the river be diverted and the area of levee construction worked on the dry side of the river. Kinda like our freeway construction.

2 I mean look what was done to the previous locations where “levee construction” was completed. Promises were made for regrowth and there has been no regrowth.

Why should we believe you now. Shut down this project and I encourage the evaluation of alternative methods that are targeted and less destructive to habitat and wildlife.

Sincerely,
Mary Wing

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Monday, January 29, 2024 8:42 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Trees

From: Bonnie Wagner <bonnieliberty123@gmail.com>
Sent: Monday, January 29, 2024 8:39 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Trees

[You don't often get email from bonnieliberty123@gmail.com. Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

1 Please preserve the trees people!!!! That's what everyone loves and is important for the wild life survival!!!!

Sent from my iPhone
Bonnie Wagner

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 8:20 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Fwd: Delivery Status Notification (Failure)

From: Thomas Russell <russell26ee@gmail.com>
Sent: Saturday, January 27, 2024 7:04 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Fwd: Delivery Status Notification (Failure)

----- Forwarded message -----

From: Mail Delivery Subsystem
Date: Sat, Jan 27, 2024, 6:55 PM
Subject: Delivery Status Notification (Failure)
To: <russell26ee@gmail.com>



Message blocked

----- Forwarded message -----

From: Thomas Russell <russell26ee@gmail.com>

To: PublicCommentARCF@water.ca.gov

Cc:

Bcc:

Date: Sat, 27 Jan 2024 18:55:12 -0800

Subject: American river project

1 I am writing to object to the proposed work on the American river. I've lived near and walked along the American river for over fifty years. The river has always been a nature area with abundant wild life. Your proposal destroys much of it. Our river has always been the jewel of Sacramento and needs to be preserved.

2 With all the growth that the valley is seeing logic would lead one to expect new reservoir projects on the upper American rivers are going to be needed very soon. Those reservoirs would also give Sacramento the flood protection that this project is trying achieve without destroying our beautiful river parkway.

Thomas Russell

From: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Sent: Monday, January 29, 2024 8:29 AM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American River Common Features public comment

From: Melinda Lauten <4113jam@gmail.com>
Sent: Monday, January 29, 2024 7:49 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American River Common Features public comment

You don't often get email from 4113jam@gmail.com. [Learn why this is important](#)

1 Your website is extremely user unfriendly and impossible to get answers from. My question about the 500 trees being removed is, If it's a decision that can be influenced by public comment, then apparently it has less to do with mediation of risk to levee failure? If it is to ensure integrity of the levees as just one option, then I say preserving the trees should be of greater value.

Already the parkway levee project has changed the natural landscape to a barren canal like environment.

Melinda Lauten

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 8:24 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River 3B Plans

From: sturtletaub@andesllc.com <sturtletaub@andesllc.com>
Sent: Monday, January 29, 2024 6:31 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River 3B Plans

1 | I'm writing in opposition to the planned removal of trees along the American River in your 3B plans. Please find a less intrusive way to do what you need. Work done around Sac State is a travesty and seems like a lazy way to deal with the water management problems.

Thank you

Steve Turtletaub
Andes Consulting, LLC



From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 8:23 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: Andrei Fintescu <afintescu@yahoo.com>
Sent: Sunday, January 28, 2024 8:17 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

When choosing to move to a new city in 2017, the Parkway was a top three consideration for my wife and I moving to Sacramento. This is one of the most amazing urban parks in the country and every effort should be made to preserve its natural

appeal. This project seems to be overkill, like amputating your arm because you broke your wrist. I regularly walk, paddle, and bike along this section of the river and it is an absolute travesty to cut down these majestic old trees. I am also concerned about the "slippery slope" of the project moving further up the river and destroying the entire parkway.

I strongly question whether this "potential bank erosion" work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed "unavoidable" impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

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

My specific concerns and comments include the following:

The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

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

Thank you.

Andrei and Chloe Fintescu

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 8:22 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Public Comment for Section 3B American River

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

From: Emily Hodge Sunahara <ehodge000@gmail.com>
Sent: Saturday, January 27, 2024 7:20 PM
To: PublicCommentARCF16@water.ca.gov; ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Public Comment for Section 3B American River

Hello,

- 1 | I am requesting the Army Corps of Engineers and Dept. of Water Resources take the time to engage in real outreach to the communities in Sacramento that will be negatively impacted by the proposed levee project in section 3B. I also
- 2 | request alternatives be presented to community.

- 2 | In the January webinars we were shown 7 options for the area near Cal Expo and only one option for section 3B of the American River Parkway. Why only one?
Please present more options.

- 1 | Please conduct real community outreach. Publishing a report over the Christmas holiday, with zoom public meeting hosted by a low level staffer sends a “we don’t care” message which only further upsets the community.

Thank you,

Trent and Emily Sunahara
Residents of College Greens Neighborhood near Section 3b

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 8:12 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] USACE Project 3B

From: Joseph Sheffo <joesheffo@yahoo.com>
Sent: Saturday, January 27, 2024 2:42 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] USACE Project 3B

- 1 | I am not an engineer, but the project as proposed seems completely out of proportion to even reasonable concerns about flooding in our area. I have lived on the levee for nearly a decade and have never felt threatened by possible floods, even during a heavy rain year. Residents who have been here since the late 1970s, when the units were built, have only once experienced a serious flood threat.
- 2 | Furthermore, as I understand it, unlike River Park, the neighborhoods around Larchmont Park are at the very edge of the flood zone. Also, our levees have been well maintained and upgraded. And isn't global warming supposed to lead to more droughts in California (or so we are constantly told)? More droughts, fewer floods.
- 3 | This project will destroy the community character, perhaps forever. Please ask yourself if you would want this project if the consequence was the creation of a bare wasteland where once a vibrant riparian area existed, and all for marginal benefits.

Joe Sheffo

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 1:56 PM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: American River Parkway Levee repair and brush clearing

From: Stacie Sherman <sas8721@hotmail.com>
Sent: Monday, January 29, 2024 1:30 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] American River Parkway Levee repair and brush clearing

I have heard that the Army Corp of Engineers has been tasked with reinforcing the levee along the American River and that past work has cleared nearly all the trees and brush.

I hope that the Army Corp of Engineers can reinforce the levee with care and conserve as many trees as is feasible. Trees take generations to grow and the parkway is a native habitat for many creatures plus the trees provide the parkway users with a beautiful place to visit.

1 I understand that in order to complete the work, trees will need to be removed but all reasonable effort should be made to protect trees in the project area.

The American River Parkway is the heart of the Sacramento region and millions of people visit the area because it is a beautiful peaceful place.

Hopefully, with the great skill of the engineers, they can devise a plan that protects property from flooding and also protect our beautiful parkway.

Sincerely,

Stacie Sherman
Orangevale. Ca

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 1:55 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments on American River Common Features 2016 Flood Risk Management Project

From: nancy dagle <nancykayaker@att.net>
Sent: Monday, January 29, 2024 12:57 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments on American River Common Features 2016 Flood Risk Management Project

The following are my comments on the proposed Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report XIV on the Lower American River Flood Risk Management Project.

The goal of additional flood protection along the American River corridor has merit. Unfortunately, the proposed project calls for the destruction of the very riparian habitat that has mediated past floods and puts most of the flood reduction on the raising of existing levees, the addition of new ones, and the application of rip/rap.

- 1 The Army Corps of Engineer (ACE) project on the American River should proceed under the ACE's Sustainable Rivers Program. As this program states: "The Sustainable Rivers Program proactively improves environmental health by changing the operation of water infrastructure to benefit natural communities." The upstream ACE Folsom Dam operation needs to part of the discussion of how to control floods. This project should integrate water management with floodplain management which protects ecosystems to benefit both nature and people.

- 2 As the American River has been determined to be a Wild and Scenic River, the destruction of the riparian area should be minimized, and the enhancement of existing features prioritized. The current project as proposed would destroy the benefits of current floodplains and vegetation.

I have a degree from UC Davis in Soil and Water Science and have worked on California River riparian and flood projects for 45 years. I am willing to work with the ACE and Sacramento Area Flood Control Agency to meet flood protection goals without the destruction of the American River riparian area.

Nancy Dagle

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 1:54 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: American River - No to Contract 3B!

From: Jennifer Wyatt <jwyatt@ucdavis.edu>
Sent: Monday, January 29, 2024 11:16 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River - No to Contract 3B!

1 | Please, please do not remove and flatten the trees and bushes along the American River Parkway in Contract 3B. We live along the American River at Estates, and it would destroy the habitat of the animals living next to us and ruin all that makes our neighborhood and backyard beautiful. Please, please do not remove the trees, bushes, and vegetation any further like was done at Paradise Beach/ Campus Commons Golf Course/ H Street Bridge/ Sac State and Howe. It looks awful and destroys the neighborhood enjoyed by countless people every day all day long.

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From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 1:51 PM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Protecting the American River

From: Jennifer O'Neill Pickering <jenniferartist09@gmail.com>
Sent: Monday, January 29, 2024 11:08 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; SupervisorKennedy@saccounty.gov
Subject: [Non-DoD Source] Protecting the American River

List of Key Concerns

I live near the American River and painted a painting honoring the lower American River.

Every time I cross the bridge over the river it sickens me, seeing a vibrant riparian forest that has been turned into a desert. I oppose this continuing project of destruction. Paradise Beach where my friends and family spent many Summer days and evenings is erased.

Below are facts that should not be ignored but are. I have lived through floods and the river doesn't stop because rocks are piled on it or every tree, bush or animal has been destroyed. Please consider other more surgical options. Save the beauty and diversity our river offers.

Sincerely,

Jennifer Pickering

Limited Evidence for Unnecessary Removal of Trees and Vegetation:

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

2. Rip Rapped streambanks present significant negative consequences:

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

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

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

4. Impact on Wildlife and Critical Habitats:

- The biodiversity of this ecosystem is complex and interconnected and is heavily used by wildlife
- Clear-cutting and rip rapped streambanks pose a threat to critical habitats for various fish species, including Chinook Salmon, Central Valley Steelhead, and North American Green Sturgeon.
- Clear-cutting disrupts the nesting, mating, and feeding habits of local and migratory bird populations.
- Large, mature trees provide essential nest cavities that would be lost.
- The substantial loss of shade from the mature canopies along the river's edge may lower the survival rate of various species of salmonids.

- The petition for listing the western pond turtle imposes additional requirements on the environmental analysis and mitigation.
- High levels of noise and vibrations will disturb natural animal behaviors such as nesting, spawning and feeding activities

5. Recreational Access:

- This part of the river is heavily used by the public for walking, swimming, fishing, kayaking, bird and wildlife viewing, and general enjoyment of natural features. There are many footpaths in the forest and beaches along the shore that are extremely important to the public. The Corps has not provided any detail as to what, if any, of our mature trees, footpaths, beaches, fishing access points, and other natural features will be preserved. Why should we think that the Corps will do anything different than at River Park, where all of these features such as mature trees, beaches, footpaths, etc., appear to have been destroyed? Sac State is used as a restoration example, but we know of no beaches, footpaths, fishing access points there, either. Why should we trust that 3B will be different when even the SEIS/SEIR does not address these issues?
- Installation of miles of angular rock (riprap) will make river access dangerous along large stretches of river, and will greatly impede swimming, fishing, and deployment of watercraft such as kayaks. This will be a permanent and significant loss of irreplaceable recreational amenities to the community that is not accounted for in the SEIS/SEIR, despite promises by the Corps in 2016 to address these significant issues.
- The permanent loss of mature trees, beaches, river access points, footpaths, and other recreational amenities is not “less than significant” as stated in the SEIS/SEIR. The Corps needs to document these losses and redo the SEIS/SEIR to account for them,

including proposals to modify the project where possible to minimize losses.

- The public has a right to know how specific recreational amenities will be affected by this project. The level of detail in the SEIS/SEIR makes it impossible for the public to see what will be done, and all we can assume is everything in 3B upstream of Watt Avenue on the south side will be ripped out like at River Park. The public has a right to know the details at this stage of review and should not be required to “trust” the Corps. We want the Corps to document and justify specifically which of our trails, trees, beaches, fishing access, and riparian forest must be destroyed to keep us safe from floods, and how much of that destruction will be replaced, versus what will be lost permanently given current design.
- What mitigation for lost beaches, trails, forests, etc. will there be? The SEIS/SEIR does not discuss the loss of these features, so it also inappropriately fails to discuss mitigation for permanent impacts to features that the Corps cannot replace onsite. If beaches or trails are lost forever onsite, will other beaches or trails be installed?

6. Mental Health and Vegetation

- Trees contribute to the creation of green spaces, which have been associated with improved mental health. The presence of greenery has been linked to reduced stress levels, enhanced mood, and increased feelings of well-being. The removal of trees can lead to a loss of these beneficial green environments.
- Research has shown that “green exercise” may confer mental health benefits in addition to improving physical health.
- Natural park settings decrease anger, anxiety, and depression; and increase restoration and tranquility.

- The U.S. Department of Health and Human Services states that the lack of green space is one of the most important causes of childhood obesity, and the need for green places to protect children's health is becoming more recognized and apparent.
- Trees play a role in filtering air pollutants and absorbing noise. Their removal can contribute to increased levels of air pollution and noise, both of which have been associated with negative effects on mental health. Poor air quality and excessive noise can contribute to stress, anxiety, and other mental health issues.
- Trees often serve as gathering places and contribute to the sense of community. The removal of trees can alter the social dynamics of an area, potentially reducing opportunities for social interaction and community engagement. Social connections are important for mental health, and changes in community dynamics can have psychological implications.

7. Cultural Restoration and Inclusion:

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

8. Air Quality:

- For California/CEQA, diesel exhaust particulate matter (Diesel PM) is a carcinogen, with a cancer potency value from the Office of Environmental Health Hazard Assessment (OEHHA), and OEHHA reports that between the ages of 2 to 9 years old, children are three times more sensitive to a carcinogen than adults. (Between third trimester and 2 years old, they are 10 times more sensitive).
- The project is large, with over 100 daily truck trips at each site and staging areas adjacent to residences and schools. Mitigation Measure AIR-3 of the SEIR requires using on-road haul trucks to be

equipped with 2010 or newer engines. However, trucks are already required to be 2010 or newer under CARB's Truck and Bus Regulation. The USACE mitigation measures should require much cleaner trucks -- 2014 or newer or, better yet, electrics.

- Even where impacts will remain significant and unavoidable after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code § 21081; 14 CCR § 15126.2(b)).
- Although construction of the Project would occur over two years, each site would have over 100 daily truck trips at each location that travel through residential communities. USACE claims less than significant impacts of air pollution on sensitive receptors. However, the OEHHA guidance recommends assessing cancer risks for construction projects lasting longer than two months ([OEHHA, page 8-18](#)). USACE should have prepared a construction health risk assessment (HRA), to provide substantial evidence on the record that the Project would not expose residences to Diesel PM emissions that would result in a significant health impact.
- Using quarry rocks from unspecified quarry sources has not been adequately addressed for concerns that the rocks may contain asbestos content (given the prevalence of serpentine rocks in surrounding foothill sources). Dust from hauling and dumping asbestos-containing rocks within a quarter mile of a school requires further environmental impact analysis.

9. Environmental Justice (EJ):

- The American River Parkway provides wilderness-quality natural and recreational opportunities, involving little cost or travel, for people of all income levels, ethnicities, and walks of life. Family picnics on small points and beaches are extremely popular in this

area. The proposed methods would eliminate these locations that are accessible to disadvantaged populations. This has not been adequately addressed in the e

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Monday, January 29, 2024 10:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Dan Sundberg <dbsundberg@gmail.com>
Sent: Monday, January 29, 2024 10:09 AM
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:

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 For years I have used the parkway for running, biking, and taking my dog for a walk. In Sacramento's extremely hot summers the wooded and shaded portions of the levee trail is a refuge where it's still possible to be outside (especially for my dog). The clear cut areas of the levee and parkway trail are essentially unusable (not to mention unsightly) during the summer months.

B I am also a Real Estate agent professionally, and the River Trail and the easy access to nature it provides is an enormous selling point for many people relocating to our city. Destroying this will be actively destroying an asset that has real financial value to our community as well.

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.

C I support the intent of the project to stabilize the river bank to ensure the safety of the people of Sacramento. And while I understand the current approach may be the most efficient way of achieving the goal, it completely ignores the tremendous community value the current wildlands provide.

This stretch of river trail receives tremendous use by the local community. It is one of the only ares in walking or biking distance from the busy downtown that truly feels wild. This is a unique feature of Sacramento that we have our wild river running through town, just a short bike ride away. I see other cities who have hemmed in their rivers and wild spaces for practical purposes, and they feel dead and sterile.

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.

Dan Sundberg, PhD

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Monday, January 29, 2024 3:21 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: American river Parkway

From: Tara B Page <tbp327@gmail.com>
Sent: Monday, January 29, 2024 11:27 AM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: American river Parkway

You don't often get email from tbp327@gmail.com. [Learn why this is important](#)

1 Though clear cutting is most affordable it is an inappropriate way to handle the tree removal along this highly used trail.

Please be more specific with your removals in this project and only remove growth that is absolutely necessary.

Tara B Page

East Sac resident and biking enthusiast

From: Brown, Josh@DWR <Josh.Brown@water.ca.gov>
Sent: Monday, January 29, 2024 3:23 PM
To: Sutton, Drew
Cc: Bailey.Hunter@usace.army.mil
Subject: [EXT] FW: Regarding the removal of trees

From: Carolynn Kohn <carolynnkohn@hotmail.com>
Sent: Monday, January 29, 2024 1:38 PM
To: DWR Public Comment ARCF 16 <PublicCommentARCF16@water.ca.gov>
Subject: Regarding the removal of trees

You don't often get email from carolynnkohn@hotmail.com. [Learn why this is important](#)

Dearn ARCF16,

This is in regards to reevaluating the plan to remove [an alleged 500 trees](#) for American River Levee project.

I understand some trees likely have to be removed. However, I'm hoping it's as few as possible. Having a long-range view of the area is important. The trees are important, and it takes decades for trees to grow to the stature and grandeur of the current trees.

Please consider spending a bit more on the front end to save as many trees as possible, and this will also likely cost less in the long run.

Thank you for your consideration.

~ Carolynn Kohn
Land Park, CA 95818

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 30, 2024 12:00 PM
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: caf59@comcast.net <caf59@comcast.net>
Sent: Tuesday, January 30, 2024 11:55 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Cc: PublicCommentARCF16@water.ca.gov; AmRivTrees@gmail.com; TBP327@GMAIL.COM
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) 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.

One of the benefits of living in the Sacramento area is to ride or hike along the American River Parkway trail. This is something that is near and dear to me as a cyclist and I use this parkway quite often. Animal habitat depends on the trees, floral, and fauna of this region therefore complete tree removal would completely decimate this area. Surely there is a better way of rectification than to completely destroy this 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.

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.

Cindy Freeman

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Tuesday, January 30, 2024 7:50 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: James M Pappas <papfam@pacbell.net>
Sent: Monday, January 29, 2024 6:22 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) Comment Recipients:
My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B.

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

I strongly question whether this “potential bank erosion” work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

I do not support the devastating methods being proposed to address potential bank erosion concerns, and I do not see that the environmental analysis adequately characterizes the significant impacts, nor provides adequate mitigation to consider them mitigated to insignificant, nor considers all feasible alternatives to supposed “unavoidable” impacts, including considerations of alternative methods on a much more fine-grained scale than simply the overall project.

Under the California Environmental Quality Act (CEQA), even where impacts will remain “significant and unavoidable” after mitigation, CEQA requires that all feasible mitigation measures be incorporated (see California Public Resources Code§ 21081; 14 CCR§ 15126.2(b)). The draft SEIS/SEIR has not met that requirement. The analysis of alternatives for a much more surgical, fine-grained approach (with less environmental impacts) are not presented. The US Army Corp of Engineers should perform a more adequate environmental analysis of the significant impacts of the proposed project and its subcomponents, and should not go forward with the subcomponents of Contracts 3B and 4, until a much MORE TARGETED and LESS DESTRUCTIVE alternative approach to Erosion Control Projects 3B and 4 is presented.\

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

Thank you.
James M. Pappas

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Friday, February 2, 2024 8:15 AM
To: Sutton, Drew
Cc: publiccommentARCF16@water.ca.gov; ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Sara Peña <snpena@gmail.com>
Sent: Friday, February 2, 2024 6:52 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

My comments focus on the lower American River projects of the draft SEIS/SEIR, particularly Contracts 3B, and 4A and 4B. I have serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

A The American River Parkway is extremely valuable to me. I spend every weekend doing long walks and exploring with my dog along the American River. It's a much needed respite from the busy weekdays and a break from the urban neighborhood walks. We both enjoy this time so much and it adds an incredible amount of value to our lives. Being able to enjoy shaded walks on the American River is one of the primary reasons I tell people I love living in Sacramento. The fact that we have easy and quick access to nature is truly special and sets Sacramento apart from other major metropolitan areas. Mature and established trees are critical to the experience, provide homes for wildlife, capture carbon emissions, and cool our increasingly warmer climate.

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
2. Rip Rapped streambanks present significant negative consequences
3. Erosion is minimal in USACE’s Contract 3B
4. Impact on Wildlife and Critical Habitats
5. Recreational Access
6. Mental Health and Vegetation
7. Cultural Restoration and Inclusion
8. Air Quality
9. Environmental Justice

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.

Sara Peña

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 1, 2024 4:14 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Jessa Hollett Barniol <hppyjessa@yahoo.com>
Sent: Thursday, February 1, 2024 4:03 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>; PublicCommentARCF16@water.ca.gov
Subject: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

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

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

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

The American River Parkway is extremely valuable to me. I live nearby and often walk through and enjoy the wooded area with my family. We enjoy the view from our kayak on the river. The

greenbelt is an oasis in the middle of the city, and is one of the reasons we decided to move to this part of town.

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 • Trees and vegetation provide self-renewing natural armoring of the banks that would be eliminated. Removing trees may make us less safe.
- 2 • Historically, levee failures were more associated with areas where riparian forests had been thinned or clear-cut.
- 3 • 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
- 4 • Destruction of vegetation worsens the heat island effect.
- 5 • 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.
- 6 • 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.

My specific requests include the following:

- 7 • I insist on a thorough demonstration of the spot-by-spot need and benefit analysis.

I encourage the evaluation of alternative methods that are targeted and less destructive to habitat and wildlife.

I advocate for Environmentally Friendly Approaches:

I promote the consideration of "spot fixes," small equipment, and maintenance.

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

I emphasize the importance of finding ways to achieve both tree preservation and any erosion work (if needed) for flood protection.

I encourage a balanced approach that addresses environmental concerns.

8 I demand Greater Detail about Work to be Done. The current environmental documentation does not show in adequate detail what specific work will be done.

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.

Jessica Barniol

Sacramento Resident, lives one block from an American River
Access

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 1, 2024 3:54 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Erosion Project - No to Contract 3B!

From: Jennifer Wyatt <jenniferswyatt@gmail.com>
Sent: Thursday, February 1, 2024 3:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Erosion Project - No to Contract 3B!

1 Please, please do not remove and flatten the trees and bushes along the American River Parkway in Contract 3B. We live along the American River at Estates, and it would destroy the habitat of the animals living next to us and ruin all that makes our neighborhood and backyard beautiful. Please, please do not remove the trees, bushes, and vegetation any further like was done at Paradise Beach/ Campus Commons Golf Course/ H Street Bridge/ Sac State and Howe. It looks awful and destroys the neighborhood enjoyed by countless people every day all day long.

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 1, 2024 9:23 AM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Find another way! Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)

From: Spark De Vivre <sparkdevivre@gmail.com>
Sent: Thursday, February 1, 2024 8:49 AM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Find another way! Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR)

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 ride along this beautiful section 3-4 times a week. I also work at Sacramento State. I used to recommend that students and job candidates walk across the bridge to

enjoy the little slice of nature in town, but since the already completed work decimated the area, I no longer suggest visiting the wasteland.

Please revisit the remaining plan, which is based on flawed, outdated, and incomplete science. For the sake of the region's mental health, the wildlife corridor, and even property values. We live here. Please don't destroy it.

2

I strongly question whether this "potential bank erosion" work is necessary along this section of the American River, and have concerns that the proposed approach of clearcut, bare banks during two years of construction followed by years of isolated, immature plantings, is just as likely to put us at risk in high water flows as no work at all.

Do not do this to us. Find a better way!

Kimberly Nalder

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Thursday, February 1, 2024 7:51 AM
To: Sutton, Drew
Cc: ARCF_SEIS; publiccommentARCF16@water.ca.gov
Subject: [EXT] FW: [Non-DoD Source] Preserve American River riparian habitat

From: Daniel Rinne <daniel.rinne@gmail.com>
Sent: Wednesday, January 31, 2024 8:11 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] Preserve American River riparian habitat

1 The proposed Army Corps of Engineers flood control remediation on the American River from below Howe Ave to above Watt Ave has already had significant detrimental impacts on riparian habitat from River Park to Howe Ave. I am adamantly opposed to further degradation of habitat farther upstream from Howe Ave to Estates Dr. In particular, the woodland oak habitat is home to bobcat, coyote, deer, and threatened species like the yellow-billed magpie that only lives in the Central Valley.

I urge delay of this project until further environmental review and impact assessment can be accomplished.

Thank you for your consideration

Daniel Rinne

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 31, 2024 1:16 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] American River Parkway

From: tmccrystle@gmail.com <tmccrystle@gmail.com>
Sent: Wednesday, January 31, 2024 1:05 PM
To: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Subject: [Non-DoD Source] American River Parkway

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 walk that stretch of river for days a week, its beauty and natural ambience a healthy respite from the stress of daily life.

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 concern includes the following:

A Destruction of wildlife habitat along that stretch of the parkway, which I have been enjoying since 1972, when my family moved to the area. Long gone are the ring neck pheasants that roosted in the oaks, and it would be more than a shame to lose the valley quail, barn owls, great horned owls, red foxes, and other attached who make their homes there.

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.

Timothy McCrystle

Sent from my iPhone

From: ARCF_SEIS <ARCF_SEIS@usace.army.mil>
Sent: Wednesday, January 31, 2024 1:15 PM
To: Sutton, Drew; publiccommentARCF16@water.ca.gov
Cc: ARCF_SEIS
Subject: [EXT] FW: [Non-DoD Source] Comments Regarding American River Common Features (ARCF) 2016 Draft Supplemental Environmental Impact Statement/Subsequent Environmental Impact Report (SEIS/SEIR) – December 2023 Report and Appendices

From: Thomas Vallance <vallance219@gmail.com>
Sent: Wednesday, January 31, 2024 12:06 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 VERY serious concerns with the proposed project and the draft SEIS/SEIR environmental analysis.

The American River Parkway is one of the most treasured and visited sites in Sacramento. THIS IS A VERY SPECIAL STRETCH OF THE AMERICAN RIVER PARKWAY!!! This stretch of the American River has brought me much joy over my 20 years of being a resident near Larchmont Park. Protecting this wildlife corridor is

of utmost importance to me. Please the project to move forward in a more intentional and less nature destructive manner, as we have seen from the recent work near Howe Ave. and Sacramento State.

I POWERFULLY QUESTION if 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 FLOW AS **NO WORK AT ALL!!!**

I DO NOT SUPPORT the shocking 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. I believe this CAN AND SHOULD be done in a targeted manner, rather than the utter destruction that I see from the J STREET bridge.

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 CONCERNS are many:

B

- Two and Three hundred year old trees along this stretch are not marked for saving. A gargantuan **HERITAGE OAK** (350+ years old) near Larchmont Park is NOT marked for saving. Our children and grandchildren will never be able to enjoy its beauty. Many birds use this tree for nesting. I have seen such a large variety of birds here, including owls, warblers, magpies, cedar waxwing and many more.
- There are 40 nesting boxes that have raised countless birds in this special area that is threatened.
- **A huge wildlife corridor will be destroyed!!!**
- Heavy equipment staging Larchmont Park may destroy some of its trees.
- C The concern to me is the large equipment and the impact on our whole area.
- D Hiking trails will be blocked and changed irreparably.
- My heart breaks at the thought of this area being bulldozed for construction.
- Access requirements for the large equipment to be used will destroy all the beautiful trees along the way.

REQUESTS:

E

- ***I request a PUBLIC meeting!!! The residents on the J Street area of destruction did not get any notice. There are many in my neighborhood that do not know these plans for MASS bulldozing this area.***

F

- ***I request NO MASS BULLDOZING be used, as it was near J Street.***
- ***I request that all projects, including this one, have a target analysis and approach.***

- ***I request that smaller equipment can be used, so there is less destruction.***
- ***I request the use of barges, rather than Larmont Park be used for staging.***
- ***I request that there be a more targeted approach to this project.***
- ***I request that an analysis of if this area which has island buffers and bends really needs this project.***

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.\

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Thank you.

Thomas W. Vallance

Near Larchmont Park